DRAFT

ENVIRONMENTAL IMPACT REPORT

BAKER STREET WAREHOUSE PROJECT

LAKE ELSINORE, CALIFORNIA

STATE CLEARINGHOUSE NO. 2024070504

CITY OF LAKE ELSINORE
DREAM EXTREME™

LSA

December 2025

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LAKE ELSINORE, CALIFORNIA

STATE CLEARINGHOUSE NO. 2024070504

Submitted to:

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December 2025

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LIST OF ABBREVIATIONS AND ACRONYMS

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
2022 Wildfire Guidance	*Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*
AB	Assembly Bill
ACF	Advanced Clean Fleets
ACMs	asbestos-containing materials
ACS	American Community Survey
ADT	average daily trips
AERMOD	American Meteorological Society/USEPA Regulatory Model
AG	Agricultural
Agua Caliente	Agua Caliente Band of Cahuilla Indians
amsl	above mean sea level
APA	American Planning Association
APN	Assessor's Parcel Number
APS	Alternative Planning Strategy
APSA	Aboveground Petroleum Storage Act
AQMP	Air Quality Management Plan
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
Brief	Brief of Amicus Curiae
CAAQS	California ambient air quality standards

CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CARB Handbook	*Air Quality and Land Use Handbook*
CBB	Crotch's bumble bee
CBSC	California Building Standards Commission
CCAA	California Clean Air Act
CCH	Consortium of California Herbaria
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
Census	United States Census Bureau
CERS	California Environmental Reporting System
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CHRIS	California Historical Resources Information System
City	City of Lake Elsinore
CLCA	California Land Conservation Act of 1965
CMP	corrugated metal pipe
CNEL	Community Noise Equivalent Level
CO	carbon monoxide

CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
Connect SoCal	*Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy*
Construction General Permit	*National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002*
County	County of Riverside
CPP	Corridor Protection Plan
CREC	controlled recognized environmental condition
CRHR	California Register of Historical Resources
CTC	county transportation commission
CTR	California Toxics Rule
dB	decibels
dBA	A-weighted decibels
DCV	design capture volume
DEH	Riverside County Department of Environmental Health
DOC	California Department of Conservation
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DRRP	Diesel Risk Reduction Plan
DTSC	California Department of Toxic Substances Control
ECC	Emergency Command Center
EDR	Environmental Data Resources, Inc.

EHL	Endangered Habitats League
EIR	Environmental Impact Report
EJ	environmental justice
EMD	Emergency Management Department
EMFAC	EMission FACtors
EOC	Emergency Operations Center
EV	electric vehicle
EVMWD	Elsinore Valley Municipal Water District
FAA	Federal Aviation Administration
FAR	floor area ratio
FCAA	Federal Clean Air Act
FICON	Federal Interagency Committee on Noise
First Update	*First Update to the Climate Change Scoping Plan*
FMMP	Farmland Mapping and Monitoring Program
FMZ	Fuel Modification Zone
Forest Practice Act	Z'Berg-Nejedly Forest Practice Act
FRA	Federal Responsibility Area
FRAP	Fire and Resources Assessment Program
FSZ	Farmland Security Zone
GHG	greenhouse gas
GLA	Glenn Lukos Associates, Inc.
GP EIR	General Plan EIR
gpm	gallons per minute

Groundwater Discharge Permit	*General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality, Order No. R8-2020-0006, NPDES No. CAG998001*
GWP	global warming potential
H_2S	hydrogen sulfide
HMBP	Hazardous Materials Business Plan
HRA	health risk assessment
HREC	historical recognized environmental condition
HWG	Hazardous Waste Generator
I-	Interstate
ICC	International Code Council
IGR	Inter-Governmental Review
Industrial General Permit	*National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. WQ 2014-0057-DWQ, as amended by Order No. WQ 2015-0122-DWQ and Order No. WQ 2018-0028-DWQ, NPDES No. CAS000001*
ISO	Insurance Services Office
JPR	Joint Project Review
LBP	lead-based paint
LBV	least Bell's vireo
LCFS	low-carbon fuel standard
LED	light-emitting diode
LEMSAR	Lake Elsinore Marine Search and Rescue
L_{eq}	equivalent continuous sound level
L_{max}	maximum sound level

LID	Low Impact Development
LOS	Level(s) of service
M-1	Limited Manufacturing
M-2	General Manufacturing
MEI	maximally exposed individual
MEK	methyl ethyl ketone
MJLHMP	Multi-Jurisdictional Local Hazard Mitigation Plan
MLD	Most Likely Descendent
MMRP	Mitigation Monitoring and Reporting Program
Morongo	Morongo Band of Mission Indians
MS4	municipal separate storm sewer systems
MSHCP	Multiple Species Habitat Conservation Plan
MWD	Metropolitan Water District of Southern California
MWELO	Model Water Efficient Landscape Ordinance
MWS	modular wetlands system
NAAQS	national ambient air quality standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NEPSSA	Narrow Endemic Plant Species Survey Area
NETR	Nationwide Environmental Title Research
NHPA	National Historic Preservation Act of 1966
NHTSA	National Highway Traffic Safety Administration
NIMS	National Incident Management System
NOP	Notice of Preparation

NO_X	nitrogen oxides
NO_2	nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NPPA	Native Plant Protection Act
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
ONT	Ontario International Airport
OS	Open Space/Floodway
PA	Participating Agency
PCE	passenger car equivalent
Pechanga	Pechanga Band of Indians
Phase I ESA	*Phase I Environmental Site Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530*
PM	Post Mile
$PM_{2.5}$	particulate matter less than 2.5 microns in diameter (fine particulate matter)
PM_{10}	particulate matter less than 10 microns in diameter (coarse particulate matter)
Porter-Cologne Act	Porter-Cologne Water Quality Control Act of 1970
PRC	Public Resources Code
Project	Baker Street Warehouse Project
PV	photovoltaic
RCA	Regional Conservation Authority

RCP	Regional Comprehensive Plan
REC	recognized environmental condition
REMEL	Reference Energy Mean Emission Level
RHNA	Regional Housing Needs Assessment
Rincon	Rincon Band of Luiseño Indians
Riverside County MS4 Permit	NPDES Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024
ROG	reactive organic gases
ROW	right-of-way
RPS	Renewables Portfolio Standard
RV	recreational vehicle
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCE	Southern California Edison
SCIC	South Coastal Information Center
SHMA	Seismic Hazard Mapping Act
SHMP	State Hazard Mitigation Plan
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan

SLF	Sacred Lands File
SMGB	State of California Mining and Geology Board
SO_2	sulfur dioxide
Soboba	Soboba Band of Luiseño Indians
SoCalGas	Southern California Gas Company
SR-	State Route
SRA	Source Receptor Area or State Responsibility Area
SWFL	southwestern willow flycatcher
TAC	toxic air contaminant
TAZ	traffic analysis zone
TMP	Tentative Parcel Map or Transportation Management Plan
Torres Martinez	Torres Martinez Desert Cahuilla Indians
TPA	Transit Priority Area
TPZ	Timberland Production Zone
TRU	transportation refrigeration unit
TUMF	Transportation Uniform Mitigation Fee
Unified Program	Unified Hazardous Waste and Hazardous Materials Management Regulatory Program
USDA	United States Department of Agriculture
USDOT	United States Department of Transportation

USEPA	United States Environmental Protection Agency
USGS	United States Geological Survey
UST	underground storage tank
VIA	Visual Impact Assessment
VMT	vehicle miles traveled
VOC	volatile organic compound
WAIRE	Warehouse Actions and Investments to Reduce Emissions
WQMP	Water Quality Management Plan
WSC	Western Science Center
ZEV	zero-emission vehicle
ZNE	zero net energy

EXECUTIVE SUMMARY

INTRODUCTION

In accordance with *State California Environmental Quality Act (CEQA) Guidelines* Section 15123, this Executive Summary provides an overview of the findings outlined in this Environmental Impact Report (EIR), including a discussion of alternatives and cumulative impacts.

PROJECT UNDER REVIEW

This EIR has been prepared to evaluate the environmental consequences of approval and implementation of the proposed Baker Street Warehouse Project (proposed Project). The 140.04-acre Project site consists of four elements: a 65.81-acre Onsite Development Area within which two proposed warehouse buildings totaling 1,000,451 square feet and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities, and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

Requested Project entitlements include a Zone Change, Design Review, a Tentative Parcel Map, two Conditional Use Permits, and other discretionary and ministerial approvals, permits, and actions by the City of Lake Elsinore (City) (e.g., final maps, grading permits, and water and sewer system approvals). Refer to Chapter 2.0, Project Description, for a complete description of the proposed Project and requested permits and approvals.

The following objectives are identified for the proposed Project relative to the planning and CEQA processes:

1. Embrace flexible and diverse industrial land uses that foster economic development opportunities for the City of Lake Elsinore and surrounding areas near Interstate (I-)15.

2. Provide local, well-paying jobs to residents who may otherwise travel out of the region for employment.

3. Provide new economic development that is consistent with the City's General Plan.

4. Facilitate the construction of utilities, roads, and other major infrastructure that are sufficiently sized to adequately serve the Project site and vicinity, as planned by the City's General Plan.

5. Enhance streetscapes and provide buffers between the planned land uses.

6. Provide for the conservation and restoration of over 33 acres of land.

7. Incorporate "green" and sustainable practices, as practicable, in developing buildings and infrastructure.

8. Maximize the use of native plant materials/species in the Project landscaping, especially in areas located in proximity to preserved native habitat.

SUMMARY OF IMPACTS, MITIGATION MEASURES, AND REGULATORY COMPLIANCE MEASURES

This summary provides an overview of the analysis contained in Chapter 3.0, Environmental Analysis, Impacts, and Mitigation Measures. CEQA requires a summary to include discussion of: (1) potential areas of controversy; (2) significant impacts; (3) recommended mitigation measures; (4) alternatives to the project; and (5) cumulative impacts.

Potential Areas of Controversy

The City issued a Notice of Preparation (NOP) to the public to solicit comments on the scope of the analysis to be included in the EIR. The 30-day public comment period extended from July 19 to August 19, 2024. Comments received during the public review of the NOP are summarized in detail in Table 1.A: Notice of Preparation Agency Comments Received (see Section 1.0, Introduction), which concerned the following issues:

- Aesthetic and visual impacts, including impacts to viewsheds, visual character of surrounding communities, and wildlife behavior (see Sections 3.1: Aesthetics and 3.4: Biological Resources);

- Air quality and associated human health effects (see Section 3.3: Air Quality)

- Biological resources, including Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) consistency (see Section 3.4: Biological Resources);

- Cultural and tribal cultural resources, including historical site uses and Native American consultation procedures (see Section 3.5: Cultural Resources and Section 3.18: Tribal Cultural Resources);

- Energy impacts, including suggested mitigation measures (see Section 3.6: Energy);

- Greenhouse gas (GHG) emissions, including best practices and suggested mitigation measures (see Section 3.8: Greenhouse Gas Emissions);

- Hazards and hazardous materials, including hazardous waste disposal procedures and contamination risks to nearby waters (see Section 3.9: Hazards and Hazardous Materials and Section 3.10: Hydrology and Water Quality);

- Hydrology and water quality, including infrastructure strain and compliance with regulations (see Section 3.10: Hydrology and Water Quality and Section 3.19: Utilities and Service Systems);

- Land use and planning, including land use compatibility (see Section 3.11: Land Use and Planning);
- Noise impacts (see Section 3.13: Noise);
- Public services and utility impacts, including infrastructure strain, solid waste generation, and electrical facilities (see Section 3.19: Utilities and Service Systems); and
- Transportation impacts, including infrastructure strain, congestion and associated emissions, and roadway safety (see Sections 3.17: Transportation, 3.3: Air Quality, and 3.8: Greenhouse Gas Emissions).

The NOP and all comments received during the 30-day public review period are provided in Appendices A-1 and A-2, respectively.

The Public Scoping Meeting was held at the Council Chambers of the City of Lake Elsinore Cultural Center on August 1, 2024. No public comments were received during the Public Scoping Meeting. The Public Scoping Meeting Presentation is provided in Appendix A-3 of this EIR.

Significant Impacts

Under CEQA, a significant impact on the environment is defined as "…a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance." Impacts in the following areas would be significant without the implementation of mitigation measures but would be reduced to a less than significant level with the implementation of the mitigation measures recommended in this EIR:

- Aesthetics;
- Biological resources;
- Cultural resources;
- Geology and soils;
- Hazards and hazardous materials;
- Land use and planning;
- Tribal cultural resources; and
- Wildfire.

Significant and Unavoidable Impacts

Although mitigation measures (MMs) and Regulatory Compliance Measures (RCMs)[1] would be implemented to reduce or avoid identified impacts, construction and/or operation of the proposed Project would result in the following significant and unavoidable impacts.

[1] Regulatory compliance measures consist of various federal, State, and/or local acts, laws, rules, regulations, municipal codes, etc., required as a matter of policy.

Air Quality

- The Project would not be consistent with the South Coast Air Quality Management District's (SCAQMD) 2022 Air Quality Management Plan (AQMP) because operation of the Project would exceed established SCAQMD thresholds for maximum daily emissions of criteria pollutants.

- Emissions associated with operation of the proposed Project would exceed established SCAQMD thresholds. Despite the incorporation of operational practices and design features cited in **MMs AQ-1** through **AQ-10** and **PDFs AQ-1** through **AQ-5** (as discussed in Section 3.3: Air Quality and Table ES.A), operation of the Project would result in significant and unavoidable impacts for daily emissions of nitrogen oxides (NO_X).

- Criteria pollutant emissions would exceed SCAQMD thresholds, which could hinder the attainment of air quality standards. Therefore, air quality emissions associated with the proposed Project, even with the implementation of mitigation, would result in a cumulatively considerable impact. This impact would be significant and unavoidable.

Greenhouse Gas Emissions

- Project-related GHG emissions would exceed the SCAQMD's 3,000 metric tons (MT) of carbon dioxide equivalent (CO_2e) per year threshold. While the implementation of **MMs AQ-1** through **AQ-6, PDFs AQ-1** through **AQ-5,** and **MMs GHG-1** through **GHG-3** (as discussed in Section 3.3: Air Quality, Section 3.8: Greenhouse Gas Emissions, and Table ES.A) would reduce GHG emissions to the extent feasible, the majority of the GHG emissions are associated with mobile sources. No additional feasible measures are available that would further reduce GHG emissions because emissions of motor vehicles are controlled by State and federal standards, and the Project has no control over these standards; therefore, this impact remains significant and unavoidable.

- The Project would not conflict with local, regional, and statewide plans, policies, programs, and regulations that have been adopted for the purpose of reducing GHG emissions. Despite this consistency, the Project's long-term operational activities would generate GHG emissions that exceed the City's threshold of 3,000 MT CO_2e per year despite implementing Project design features and all feasible mitigation. Thus, the Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050), and a significant and unavoidable impact would occur.

- Since GHG is a global issue, it is unlikely that the proposed Project would generate enough GHG emissions to influence GHG emissions on its own; however, because Project-related CO_2e emissions would exceed the scaled SCAQMD thresholds even with mitigation, the proposed Project would have a significant contribution to cumulatively considerable GHG emission impacts. Impacts would be significant and unavoidable.

Alternatives to the Project

An EIR must describe a range of reasonable alternatives to a project, or to the location of a project, which would feasibly attain most of the project objectives (listed earlier in this section) and would

avoid or substantially lessen its significant effects.[1] The EIR need not consider every conceivable alternative; rather it must consider a reasonable range of potentially feasible alternatives that "… foster informed decision making and public participation." The City, as Lead Agency, is responsible for selecting the range of Project alternatives and must disclose its reasoning for selecting those alternatives.

Alternatives that fail to meet most of a project's stated objectives, are infeasible, or do not avoid significant environmental effects, may be rejected by the Lead Agency. The "no project" analysis shall discuss the existing conditions at the time the NOP preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.[2]

Section 5.0 (Alternatives) of this EIR provides a detailed description of each Project alternative, assesses the potential environmental impacts associated with construction and operation of each alternative, and provides justification for the selection of the "environmentally superior" alternative. The City has identified the following alternatives to the Project:

- **Alternative 1: No Project/No Development Alternative.** This alternative assumes the Project site would remain in its current, undeveloped condition.

- **Alternative 2: No Project/Buildout of Existing Land Use Alternative.** This alternative assumes the Project site would be developed consistent with the existing General Plan Land Use Designations of Limited Industrial and Floodway. Under this alternative, the entire 65.81-acre Onsite Development Area designated as Limited Industrial would be developed pursuant to the existing General Plan designation as an industrial park, consisting of an approximately 1,290,008-square-foot industrial park development with parking, landscaping, lighting, and an internal roadway network. This alternative would also include 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project. This alternative would not require a General Plan Amendment; however, it would require a zone change to make the entire site consistent with the General Manufacturing (M-2) zoning, similar to the proposed Project.

- **Alternative 3: Reduced Project Alternative.** The Reduced Project Alternative would result in the development of a single warehouse building totaling 500,225 square feet. This represents a reduction in development of 500,226 square feet, or approximately 50 percent, compared to the proposed Project. It is assumed that the warehouse building would have a similar configuration as the proposed Project, and other components of the proposed Project related to access, landscaping, infrastructure, and other amenities would remain the same. Roadway and

1 *CEQA Guidelines* §15126.3.
2 *CEQA Guidelines* §15126.6(e)(2).

infrastructure improvements identified for the proposed Project would also remain the same under this alternative.

Based on the analysis in Chapter 5.0, the environmentally superior alternative that meets all Project objectives, albeit to a lesser extent, is **Alternative 3: Reduced Project Alternative.**

Cumulative Impacts

The cumulative effect of the Project and other past, present, and reasonably foreseeable future projects is provided in Chapter 3.0 following the assessment of each environmental issue.

SUMMARY TABLE

Information in Table ES.A: Summary of Impacts, Mitigation Measures, and Regulatory Compliance Measures has been organized to correspond with the environmental issues discussed in Chapter 3.0. The table is arranged in four columns: (1) impacts; (2) level of significance prior to mitigation; (3) mitigation measures and RCMs; and (4) level of significance after mitigation. Levels of significance are categorized as follows:

- **SU:** Significant and Unavoidable
- **S:** Potentially Significant
- **LTS:** Less Than Significant

Applicable RCMs are prescribed for the proposed Project in instances where the Project would be required to adhere to various federal, State, and/or local acts, laws, rules, regulations, municipal codes, etc., as a matter of policy. The RCMs are not mitigation and are standard requirements for development projects in the city. For a complete description of potential impacts and recommended mitigation measures and RCMs, please refer to the specific topical discussions in Chapter 3.0.

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
3.1: Aesthetics			
Threshold 3.1.4: Construction of the proposed Project would involve the use of nighttime security lighting, which could result in glare impacts to nearby residents and motorists.	**S**	**MM AES-1:** Prior to issuance of grading permits, the Project developer shall provide evidence to the City of Lake Elsinore that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage by 1 foot candle to surrounding properties outside of the staging area or direct broadcast of security light into the sky.	**LTS**
Cumulative Impact: A cumulatively considerable effect would occur if the effects of the Project and cumulative development in the City resulted in impacts to: designated scenic vistas in or in the vicinity of the City; surrounding views; would affect the existing visual character or adjacent land uses as seen from public locations; or result in aesthetic changes inconsistent with the General Plan policies.	**S**	Implementation of **MM AES-1** (cited above).	**LTS**
3.2: Agriculture and Forestry Resources			
No significant impacts to agricultural or forestry resources would occur. No Mitigation Measures or RCMs are required.			
3.3: Air Quality			
Threshold 3.3.1: The regional operational-source emissions are anticipated to exceed the regional thresholds of significance for nitrogen oxides (NO_X), resulting in an inconsistency with the 2022 Air Quality Management Plan (AQMP).	**S**	**PDF AQ-1: Truck Parking.** The Project shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas. **PDF AQ-2**: **Driveways.** The proposed truck driveways are placed on streets that do not have fronting sensitive receptors.	**SU**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		PDF AQ-3: **Screening.** The Project sites shall be densely screened with landscaping along all bordering streets and site boundaries, with trees spaced no further apart than 25 feet on center. Fifty percent of the landscape screening shall include a minimum of 36-inch box trees as feasible. Truck courts would be further screened from the right-of-way by screen walls. Facility operators will be responsible for establishing a long-term maintenance mechanism to ensure that the landscaping remains in place and functional in accordance with the approved landscaping plan. **PDF AQ-4: Rideshare and Commute Trip Reduction Program.** Upon exceedance of 250 employees, facility operations will establish a rideshare and commute trip reduction program, such as IE Commuter, in accordance with South Coast Air Quality Management District (SCAQMD) Rule 2202, with the intent of discouraging single-occupancy vehicle trips and promoting alternate modes of transportation, such as carpooling and transit, where feasible. **PDF AQ-5: Signage.** Prior to receipt of occupancy permits, the Project Developer/Owner/Operator shall post signs that all parking of trucks must be within designated on-site areas and not within the surrounding community or public streets. Implementation of **MMs AQ-1** through **AQ-10** (cited below).	
Threshold 3.3.2: The daily emissions of NO_X would exceed the significance criteria established by the South Coast Air Quality Management District (SCAQMD) for this criteria pollutant.	**S**	Implementation of **PDFs AQ-1** through **AQ-5** (cited above). **MM AQ-1: Electrification.** To facilitate the future installation of infrastructure that would charge the batteries powering the motors of electric-powered trucks, the City Planning Department shall ensure that the following provisions are met:	**SU**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		1. Prior to the receipt of occupancy permits, an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric-powered trucks; Conduit shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be and where electric-powered trucks would park and connect to charging facilities to charge the batteries powering the motors of the electric trucks. 2. Prior to the receipt of occupancy permits, tenants that plan to operate electric trucks would be required to construct electrical charging infrastructure in addition to the required conduits. **MM AQ-2: Electric Vehicle Charging Stations and Designated Carpool Parking Stalls.** Prior to the receipt of occupancy permits, the Project shall install passenger car electric vehicle (EV) charging stations and designated carpool parking stalls per the provisions of the California Green Building Standards Code and require that each building be constructed with an adequately sized electrical panel(s) and conduit to accommodate EV charging stations at a minimum of 5 percent of the passenger car parking spaces.	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		MM AQ-3: **Alternative Fuels.** In order to promote alternative fuels and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to the South Coast Air Quality Management District's (SCAQMD) Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, and California Air Resources Board (CARB) regulations. Tenants shall be notified about the availability of: (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; (3) access to alternative fueling stations proximate to the site that supply compressed natural gas; and (4) the United States Environmental Protection Agency's SmartWay program. **MM AQ-4: Idling Regulations.** Prior to issuance of a certificate of occupancy, legible, durable, weatherproof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use: 1. Instructions for drivers of diesel trucks to restrict idling to more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged. 2. Telephone numbers of the building facilities manager and CARB to report violations. **MM AQ-5: Truck Fleet Operations.** All future operations shall adhere to the following: 1. The site shall have clearly marked entry and exit points for trucks and service vehicles.	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		2. Facility operators shall maintain records of their fleet equipment owned by the facility and ensure that all diesel-fueled medium-heavy-duty (MHD) trucks and heavy-heavy-duty (HHD) trucks use year 2010 or newer engines. The records should be maintained on site and made available for inspection by the lead agency. 3. Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks. 4. Signs should be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services. 5. Each facility shall designate a compliance officer responsible for implementing the measures described herein and/or in the Project conditions of approval and mitigation measures. Contact information shall be provided to the City and updated annually, and signs shall be posted in visible locations providing the contact information for the compliance officer to the surrounding community. The compliance officer also shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations. 6. Signs shall be posted in the appropriate locations directing heavy truck drivers to park and perform any self-maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets. 7. The Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route.	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		MM AQ-6: Electric Vehicle Charging and Future Truck Charging Capability. Prior to issuance of building permits, the following features shall be demonstrated on the Project's building plans to the extent feasible over minimum California Code of Regulations (CCR) Title 24 requirements. Installation shall be verified by the City prior to issuance of a certificate of occupancy. 1. For use by employees and visitors conducting business at the building, install automobile EV charging stations at the minimum number required by CCR Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building. 2. Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations in the future. 3. Install raceways for conduit to tractor-trailer parking areas in logical, gated locations determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts. **MM AQ-7: Water-Efficient Fixtures.** All water fixtures within the Project shall be water efficient (toilets/urinals using 1.5 gallons per minute [gpm] or less, showerheads using 2.0 gpm or less, and faucets using 1.28 gpm or less). **MM AQ-8: City Review of Construction Documents.** Prior to issuance of building permits, the following features shall be demonstrated on the Project's building and landscape plans to the extent feasible. Installation shall be verified by the City prior to issuance of a certificate of occupancy:	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		1. Install Energy Star-rated heating, cooling, lighting, and appliances. 2. Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment. **MM AQ-9: Tenant Lease Agreement.** Prior to issuance of a certificate of occupancy, the following language shall be included within tenant lease agreements in order to reduce operational air pollutant emissions to the extent feasible: 1. Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs. 2. Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment. 3. Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site at such time this technology becomes commercially available. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc. 4. Requirements to use exclusively zero-emission light and medium-duty delivery trucks and vans once such trucks are widely commercially available as reasonably determined by the Lake Elsinore Planning Division. Zero-emission light and medium-duty trucks (EV) shall ordinarily be considered widely commercially available if the vehicle is capable of serving the intended purpose and is widely available for purchase for less than 125% the cost of a Class 7 or 8 light or medium-duty combustion-engine truck meeting the emissions standards in place at the time the comparison is made (model year 2014 or	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		later emissions standards). In order to be capable of serving the intended purpose, the EV must be able to perform the same function as a comparable combustion engine vehicle (miles traveled on a full tank/charge, access to fueling/charging infrastructure, load capacity, climbing ability, performance in different climates). For the purpose of this cost comparison, "cost" shall mean the total vehicle cost for the first five (5) years of ownership, including any purchase incentives, rebates, and fuel and electricity costs. Any comparison must be like-for-like, i.e., must compare an EV with a new production combustion engine truck of the same class and substantially similar trim level that is widely available for purchase and immediate delivery in the area of the Project at the time the comparison is made. 5. Requirements to operate in compliance with, and monitor compliance with, all current and applicable air quality regulations for on-road trucks, including the CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and Statewide Truck and Bus Regulation. 6. Requirements and identification of the responsible party to maintain and replace rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed Project would comply with existing solar requirements of the California Energy Code in effect during permitting of the Project (at the time of construction drawing plan check submittal). In the event the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project.	

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		7. Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weatherproof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. 8. The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model year 2010 engine emission standards shall be used for the on-road transport of materials to and from the Project site. 9. Requirements for the building owner to provide a Green Cleaning Products and Paint Education Program available to the building tenant, to keep at the building's office, break room, or leasing space, or on an accessible website. **MM AQ-10: Truck Emissions.** The City's occupancy permitting shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2014 model-year emissions equivalent engine standards as currently defined in CCR Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators that own vehicles subject to Section 2025 shall maintain records on site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and State upon request.	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
Cumulative Impact: Even with implementation of MMs AQ-1 through AQ-10, operational impacts from criteria pollutant emissions would exceed SCAQMD thresholds, which could hinder the attainment of air quality standards. Therefore, air quality emissions associated with the proposed Project would result in a cumulatively considerable impact.	**S**	Implementation of **PDFs AQ-1** through **AQ-5** (cited above). Implementation of **MMs AQ-1** through **AQ-10** (cited above).	**SU**
3.4: Biological Resources			
Threshold 3.4.1: Implementation of the proposed Project would result in permanent impacts to eight of the nine vegetation communities observed on the Project site, thereby contributing to incremental habitat loss and subsequent impacts to special-status species supported by this habitat.	**S**	**MM BIO-1: San Diego Ambrosia Translocation Plan.** To mitigate the loss of 0.44 acre of habitat with long-term conservation value for San Diego ambrosia, the Project shall develop and implement a San Diego Ambrosia Translocation Plan (Ambrosia Plan). The Ambrosia Plan shall identify proposed receiver sites within the Restoration Area where ambrosia stems and where soils will be translocated. The receiver sites shall be located within a minimum of 1.32 acres of contiguous degraded habitat in the Alberhill Creek floodplain to be restored by the Project. The proposed restoration area consists of an area dominated by nonnative grasses and forbs where San Diego ambrosia was detected in the past (per public records), but due to overgrowth by invasive vegetation, San Diego ambrosia was not detected during plant surveys for the Project. The general components of the Ambrosia Plan shall include the salvage and collection of individual ambrosia stems from the donor sites. Approximately 10 percent of the stems shall be salvaged and stored at a nursery facility for propagation, to be held as a contingency source. Another 20 percent of the stems shall be translocated directly to the receiver sites, where the stems will be transplanted into study plots. The remaining stems shall be collected along with the	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		soils, which shall be transferred in bulk to the receiver sites. The expectation is that through rhizome spread, both within the plots and between the plots, the number of stems will increase. The Ambrosia Plan shall identify proposed salvage and translocation methods from the donor sites, site preparation methods of the receiver sites, plant palettes, success criteria, maintenance/long-term monitoring procedures, and contingency measures. The Ambrosia Plan shall be submitted to the City of Lake Elsinore (City), Regional Conservation Authority (RCA), United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and California Natural Resources Agency (CNRA) for review and approval prior to implementation. **MM BIO-2: Restore/Expand Coulter's Goldfields Habitat.** To mitigate the loss of 0.50 acre of habitat with long-term conservation value for Coulter's goldfields, the Project shall restore/expand Coulter's goldfields habitat in two areas. The first area consists of the expansion of habitat associated with Vernal Pool 3 by approximately 0.75 acre. The second area consists of the expansion of another 0.75-acre area in the Alberhill Creek floodplain adjacent to an existing population of Coulter's goldfields and vernal barley. If little mousetail occurs in Vernal Pool 3, then the expansion of the vernal pool shall mitigate those impacts, as it would address all vernal pool flora associated with the Vernal Pool community. However, because there was no confirmation of little mousetail during focused plant surveys, there shall not be any performance standards specific to little mousetail, as there is no recent evidence that little mousetail propagules are present in the edge portion of the vernal pool to be impacted where soil inoculum would be collected prior to impact. The Project shall develop a Habitat Mitigation Monitoring Plan (HMMP), to be prepared by a habitat restoration specialist, to address the vernal pool mitigation efforts as well as the	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		mitigation for Coulter's goldfields. The HMMP shall, at a minimum, include details about the type of mitigation, acreages, when the mitigation would be implemented, plant palettes, site preparation, weeding plan, success criteria/performance standards, monitoring plan (e.g., years/duration, frequency), reporting, the proposed management entity, and contingency measures in the event the mitigation is not successful. The type of contingency measures would depend on which success criteria/performance standards have not been met. If the mitigation areas are not meeting plant coverage and/or nonnative criteria, then additional plant remediation/maintenance efforts shall be implemented, and the monitoring period shall be extended. The HMMP shall be submitted to the City, CDFW, and USFWS (collectively referred to as Wildlife Agencies) and RCA for review and approval at least 90 days prior to the initiation of Project impacts on the riparian/riverine and vernal pool habitat. **MM BIO-3: Crotch's Bumble Bee Surveys.** Updated focused surveys shall be performed by a qualified Crotch's bumble bee (CBB) biologist during the colony active period (April to August) immediately prior to the planned disturbance of the site. If CBB is detected within the disturbance footprint, then the Project Applicant shall coordinate with CDFW to determine whether avoidance and minimization measures are feasible to avoid "take" of CBB individuals. If "take" avoidance is determined to be infeasible, then the Project Applicant shall obtain an Incidental Take Permit (ITP) from CDFW. If CBB is not detected during the updated focused surveys, then the results of the focused survey shall be valid until January 31 of the year following the updated focused surveys. If all potential CBB habitat is not removed by January 31 of that year, then focused surveys shall be repeated in a subsequent season for any remaining habitat.	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		MM BIO-4: Restoration of RCA Conserved Lands (Restoration Area). As mitigation for impacts to CBB habitat, the Project has already conserved 33.66 acres of land as part of the Restoration Area, which includes 25.58 acres of grassland with the potential to support CBB foraging, nesting, and/or overwintering. Per Section 6.5 of the *Biological Technical Report for the Baker Industrial Project*, the Project is committing to restore a portion of the 25.58 acres in conjunction with translocating San Diego ambrosia to the Restoration Area. As part of the translocation effort, the Project Applicant shall restore the applicable portion of those lands by removing nonnative plant resources that do not support CBB foraging and revegetating with appropriate floral resources to support CBB foraging. In addition, as part of its participation with the MSHCP, the Project shall pay MSHCP development fees, which will contribute to the funding, acquisition, and conservation of lands contributing to the MSHCP Reserve. The Project's payment of development fees will fund additional acquisition of lands that will support biological functions for CBB and contribute to the conservation of the species in Western Riverside County. Given the intermittent use of the site by CBB based on the species' presence in 2024 but absence in 2025, the combined measures sufficiently address the loss of habitat for CBB under the California Environmental Quality Act (CEQA) such that impacts to CBB would be reduced to below a level of significance. **MM BIO-5: Pre-Construction Burrowing Owl Survey.** A pre-construction survey for burrowing owls, performed by a qualified biologist, is required within 30 days prior to future ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging) to ensure that no burrowing owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the Project site prior to the initiation of	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		ground-disturbing activities, the Project Applicant shall immediately inform the RCA and the Wildlife Agencies and, going forward, shall coordinate with the RCA and the Wildlife Agencies to determine reasonable and appropriate procedures, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan pursuant to MSHCP guidelines/standards prior to initiating ground disturbance. If ground-disturbing activities occur but cease for more than 30 days, a pre-construction survey shall again be required to ensure that burrowing owls have not colonized the site since it was last disturbed. If burrowing owls are found, the same coordination with the RCA and the Wildlife Agencies described above shall be required. **MM BIO-6: Environmental Awareness Training and Sound Barriers.** The Project Applicant shall implement an Environmental Awareness Training Program prior to the start of construction to advise workers of sensitive biological areas within Alberhill Creek adjacent to Nichols Road. If Nichols Road improvements adjacent to the Alberhill Creek riparian habitat will occur during the least Bell's vireo (LBV) breeding season (March 15 to September 30), then reasonable and appropriate measures shall be implemented for any work within 300 feet of the habitat to avoid indirect impacts to LBV. The measures may include the installation of sound barriers, pre-construction surveys, and/or clearance surveys. The Project Applicant may, but is not required to, install sound barriers along Nichols Road adjacent to Alberhill Creek to prevent any adverse noise effects to LBV during construction. If utilized, the sound barriers shall be installed prior to any work conducted after March 15 and shall remain in place until August 31, unless it is first determined through surveys that LBV are not occupying habitat in the adjacent creek. To confirm the effectiveness of the sound barriers, a qualified biological monitor (Biological Monitor)	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		shall measure noise levels within the creek on the opposite side of the sound barriers from Nichols Road. The Biological Monitor shall determine the existing ambient noise level and whether noise levels exceed 60 decibels (dB) (or the ambient noise levels) due to construction activities. For areas where pre-construction ambient noise levels exceed 60 dB, pre-construction, ambient noise measurements may be taken by a qualified entity (i.e., Biological Monitor) during the full daylight period (sunrise to sunset). Subsequently, the median average ambient noise level can be used as the baseline in lieu of 60 dB. For any nighttime construction activities, the same would be done as above but with measurements taken during the full nighttime period (sunset to sunrise). If construction noise levels exceed 60 dB or the median average ambient noise level, whichever is greater, then the sound barrier shall be adjusted and measurements shall be retaken. If construction noise levels are determined to be under 60 dB or the ambient noise level, whichever is greater, then construction activities shall continue without any additional noise monitoring. **MM BIO-7: Pre-Construction Least Bell's Vireo Surveys and Noise Monitoring.** At least three pre-construction surveys and/or clearance surveys shall be conducted for LBV in riparian habitat within Alberhill Creek that is within 300 feet of construction activities. The number of surveys shall depend on when the surveys commence and whether LBV individuals are detected during the surveys. The survey visits shall be conducted by a qualified biologist familiar with songs, whisper songs, calls, scolds, and plumage characteristics of adult and juvenile LBV. The qualified biologist must have experience with nesting ecology and behavior of LBV to determine pre-nesting/nesting behavior. Surveys shall be conducted between sunrise and 11:00 am. Surveys shall not be conducted during periods of excessive or abnormal cold, heat, wind, rain, or other inclement weather that	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		individually or collectively may reduce the likelihood of detection. Any detections of LBV are to be mapped with behavior tracked across detections/sightings. If construction activities within the 300-foot buffer begin prior to March 15, then weekly surveys shall be conducted by a qualified biologist starting on March 15 (or on the following Monday, if March 15 occurs on a Saturday or Sunday) and shall continue until one or more LBV individuals are detected, or until May 1 if no LBV individuals are detected. If construction activities within the 300-foot buffer begin after March 15 but before May 1, then at least three weekly surveys shall be conducted starting 1 week prior to the initiation of activities and shall continue until May 1 or later to complete the minimum three surveys, unless one or more LBV individuals are detected. If sound barriers are installed prior to the initiation of construction activities and one or more LBV individuals are detected within the 300-foot buffer, then noise monitoring shall be conducted as described in MM BIO-6. If the sound barriers are demonstrated to be effective at reducing noise below the stated thresholds, as described in MM BIO-6, then additional noise monitoring shall not be required. However, the monitoring biologist shall inspect the sound barriers weekly to ensure the barriers are intact and shall advise the Project Applicant if repairs are needed to the sound barriers. If sound barriers are not installed prior to the start of construction activities, and if LBV are detected at any point during the pre-construction/clearance surveys, then daily noise monitoring shall be conducted between March 15 and September 30. A qualified biological monitor shall measure noise levels at the edge of the occupied habitat and work shall cease if, at any time, noise levels exceed 60 dB due to construction	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		activities or the existing ambient level if that is over 60 dB. Work shall restart if sound barriers are installed and are demonstrated to effectively reduce monitoring in accordance with MM Measure BIO-6. If it is determined that the sound barriers are not sufficiently reducing noise levels, then the work within 300 feet shall remain halted, and the Project Applicant will contact CDFW and USFWS to discuss if other methods are available to reduce noise levels below the stated threshold. **MM BIO-8: Pre-Construction Nesting Bird Survey.** As feasible, vegetation clearing should be conducted outside of the nesting season, which is generally identified as February 1 through September 15. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the qualified biologist shall establish reasonably adequate buffers around the nests, and the buffer areas shall be avoided until the qualified biologist determines that nests are no longer occupied (e.g., chicks have fledged or the nest failed) and the juvenile birds can survive independently from the nests. **MM BIO-9: Timing of Disturbance.** No disturbance work, including Project grading and mitigation activities (including vernal pool expansion), shall occur within western spadefoot breeding habitat associated with Vernal Pools 2 and 3 or upland habitat within 1,500 feet of the vernal pools until those areas have exclusionary fencing and have been cleared of western spadefoot during the appropriate winter survey period. • **Construction Fencing.** Construction fencing, separate from exclusionary fencing (discussed below), shall be installed along all project components to demarcate the Project boundaries. No disturbance shall occur outside the	

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		construction fencing. The fencing shall be installed prior to the start of any disturbance, to be verified (including photographed) by the monitoring biologist, and shall remain in place until construction has been completed. Fencing shall include small animal jump-outs in the fencing (e.g., gradually sloped, smooth, flat-topped mounds of dirt on the upland side of the fence, with small slits placed in the fencing at the top of the mounds). Placement of cover, ideally weathered wood, shall be placed along the inside of the fencing approximately every 50 feet. This cover shall be checked during clearance and monitoring surveys. All animals encountered under the cover shall be placed outside the fencing, with the western spadefoots being moved to the pools as described in MM BIO-9. In general, the fencing shall be inspected periodically and replaced as necessary if it becomes worn or damaged. • **Exclusionary Silt Fencing.** Exclusionary fencing shall be installed around areas that will be disturbed and shall include the entirety of the Onsite Development Area, Offsite Improvement Area, and Construction/ Improvements Buffer (off site) within 1,500 feet of the vernal pools. Exhibit 15 of the *Biological Technical Report for the Baker Industrial Project* identifies three distinct areas that shall be surrounded by exclusionary fencing, including the entirety of the on-site portion of the Project, the portion of the Baker Street improvements not within the existing road right-of-way and the Construction/Improvements Buffer, and a small area adjacent to Nichols Road and Pierce Street. Fencing shall be installed and maintained prior to the onset of winter rain events. The purpose of the exclusionary fencing shall be to enclose clearance areas for western spadefoot relocation prior to the onset of site disturbance. As with the construction fencing described in MM BIO-9, the exclusionary fencing shall be installed prior to the start of any disturbance, to be verified	

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		(including photographed) by the monitoring biologist, and shall remain in place until construction has been completed. In general, the fencing shall be inspected periodically and replaced as necessary if it becomes worn or damaged. After the clearance surveys are completed (as described below), exclusionary fencing shall remain along the disturbance boundary with the Restoration Area until the conclusion of construction activities to prevent any spadefoots from returning into the development footprint following the breeding season. It is acknowledged that construction activities might not immediately follow the breeding season in which the clearance surveys are conducted. If so, exclusionary fencing shall remain along the boundary between the Restoration Area and the development footprint until construction activities are concluded, even if multiple breeding seasons separate the clearance surveys from the start of the construction activities. The exclusionary fencing shall be monitored at least weekly during each breeding season to move any spadefoots into the Restoration Area that might be trapped on the opposite side of the fence. This monitoring shall continue until construction has been completed unless monitoring is terminated (or suspended) with concurrence from the RCA, USFWS, CDFW and CNRA. • **Hydrology Monitoring.** If construction activities occur within the Baker Street alignment or the Construction/ Improvements Buffer during the western spadefoot breeding season, a qualified biologist shall monitor the hydrology of the vernal pools after the first measurable rains to determine the earliest timeframe that western spadefoot individuals could initiate breeding. • **Western Spadefoot Clearance Prior To Pool Inundation.** After installation of construction fencing and exclusionary fencing, a qualified biologist shall perform clearance surveys and	

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		relocations during the first four large (0.25-inch or greater) rain events of the winter. The clearance surveys shall be conducted for each of the three areas described above. In addition, although existing Baker Street and Pierce Street shall not be enclosed by fencing since they have existing rights-of way, the surfaces of the dirt roads shall be surveyed along with the three exclusion zones, and any spadefoots detected on the road surfaces shall be captured and relocated. The surveys should be performed at nighttime, during each of the four rain events, or the next night following each of the four rain events. Clearance surveys shall involve walking 30-meter-or-less pedestrian transects within the exclusion fenced area while looking for western spadefoot eyeshine and individuals. Dense vegetation may require that transects be more closely spaced such that 100 percent visual coverage is provided. The qualified biologist shall perform 360-degree scans at least every 100 meters to look for eyeshine behind them. If a western spadefoot is detected, the qualified biologist shall go to the location, GPS the location, collect basic data (sex, size, behavior [e.g., emerging, walking/direction, foraging], etc.) as feasible, quickly scan 360 degrees to see if there are other individuals emerging nearby, collect the individual in a bucket for relocation, then continue along the transect route. The qualified biologist shall employ safe handling techniques to prevent directly harming individual spadefoots and prevent introducing pathogens to individual spadefoots. This shall include wearing a clean pair of disposable gloves when handling each spadefoot collected and keeping the collected spadefoots in a sterilized bucket until they are transferred to the vernal pools. Additional methods may be employed, as applicable, according to *The Declining Amphibian Task Force Fieldwork Code of Practice*. After completion of the clearance survey, all collected western spadefoots shall be evenly distributed around Vernal Pools 1 through 3. If the pools are	

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		inundated, then western spadefoots shall be placed at the water's edge of the pools. If the pools have yet to inundate, then western spadefoots shall be placed within the entrance of rodent burrows above, but within 10 meters, of the high-water line of the pools. Released individuals shall be monitored long enough to verify that they are moving and apparently healthy. • **Western Spadefoot Monitoring During Construction (and During the Interim Between Clearance Survey Areas and Construction).** After the clearance surveys are complete and until construction activities are concluded, during the western spadefoot breeding season(s), the biologist shall monitor the exclusionary fencing separating the Restoration Area from the development footprint. The biologist shall inspect the side of the exclusion fencing facing the construction site at least once per week to search for western spadefoot individuals that might be trapped inside of the exclusionary fencing. If individuals are detected inside of the fence, they shall be relocated to the opposite side of the fencing and placed just outside the inundation limits of the pools. The biologist shall inspect the surface of the pools to be impacted within disturbance limits (i.e., in the area separated from the avoided pools by the exclusion fence, as well as within any deep cracks that have formed in substrate). If spadefoots are detected within cracks, the biologist shall carefully attempt to remove spadefoots by hand and relocate them to inside the fencing demarcating the disturbance limits. If multiple breeding seasons will separate the clearance surveys from the start of construction activities, then the exclusionary fencing shall remain in place and the monitoring shall be performed for each breeding season until the start of construction, unless monitoring is terminated (or suspended) with concurrence from the RCA, USFWS, CDFW and CNRA.	

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		• **Monitoring During Initial Disturbance.** A qualified biologist shall monitor the initial ground disturbance (i.e., start of work) to Vernal Pools 2 and 3 for any spadefoot metamorphs that might escape soil cracks while equipment initially disturbs the soil. The initial disturbance of the pools shall be conducted using small equipment such as a backhoe. The disturbance shall be directed by the monitoring biologist to commence slowly from the outer edge of the pools toward the disturbance limits. If the biologist observes a metamorph escaping a crack, the biologist shall halt the equipment and attempt to relocate the metamorph to the opposite side of the silt fencing.	
Threshold 3.4.2: Implementation of the proposed Project would result in permanent impacts to approximately 0.50-acre of riverine areas and 0.17-acre of vernal pools.	**S**	Implementation of **MMs BIO-1** and **BIO-2** (cited above). **MM BIO-10: Mitigation Lands.** The Project shall mitigate impacts to 0.50 acre of Riverine Areas off site through the purchase of mitigation credits from the Riverpark Mitigation Bank. The mitigation credits shall include a minimum 1:1 of re-establishment credits (0.50 acre) and 2:1 of re-habilitation credits (1.0 acre). The Project shall mitigate impacts to 0.17 acre associated with Vernal Pool 2 and Vernal Pool 3 by expanding the existing vernal pools on the opposite (northern) side from the proposed impacts by at least 0.51 acre (minimum 3:1 replacement ratio) and enhance adjacent Alkali Grassland habitat. In conjunction with the rare plant mitigation, the Project shall include rare plant species in the vernal pool expansion area, such as Coulter's goldfields. The Project Applicant shall develop a Habitat Mitigation and Monitoring Plan (HMMP), to be prepared by a qualified habitat restoration specialist, that will identify site preparation methods, the proposed plant palette, proposed success criteria, and maintenance/long-term monitoring procedures. The HMMP shall be submitted to the City, Wildlife Agencies, and RCA for review and approval at least 90 days prior	**LTS**

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		to the initiation of Project impacts on the riparian/riverine and vernal pool habitat. **MM BIO-11: Receipt for Purchased Credits.** The Project Applicant shall provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies before issuing the grading permit for the Project. Proof of purchase shall consist of (1) a receipt from the Riverpark Mitigation Bank for the Project Applicant's purchase of at least 0.50 acre of riparian re-establishment credits and 1.0 acres of rehabilitation credits; and (2) a copy of the purchase contract/purchase agreement between the Riverpark Mitigation Bank and the Project Applicant. The purchase agreement must name Baker Street Industrial Project as the development project for which the mitigation credits are being purchased.	
Threshold 3.4.3: Implementation of the proposed Project would result in permanent impacts to 0.-17-acre of vernal pools and associated western spadefoot tadpoles.	**S**	Implementation of **MMs BIO-1, BIO-2,** and **BIO-9** through **BIO-11** (cited above).	**LTS**
Threshold 3.4.4: Implementation of the proposed Project may result in potentially significant impacts to nesting birds if construction occurs during the bird breeding season (typically February 1 through September 15).	**S**	Implementation of **MM BIO-8** (cited above). Implementation of **RCMs WQ-1** through **WQ-4** (cited under 3.10: Hydrology and Water Quality). Implementation of **RCM HAZ-1** (cited under 3.9: Hazards and Hazardous Materials).	**LTS**
Threshold 3.4.5: Implementation of the proposed Project may impact special-status plant and wildlife species and water resources protected by biological resource protection policies.	**S**	Implementation of **MMs BIO-1** through **BIO-11** (cited above).	**LTS**

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Threshold 3.4.6: The proposed Project may conflict with or obstruct implementation of the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).	**S**	Implementation of **MMs BIO-1** through **BIO-11** (cited above).	**LTS**
Cumulative Impact: A cumulatively considerable effect would occur if the Project, in conjunction with cumulative projects, would result in a significant impact on sensitive species or protected wetlands/ riparian resources, or conflicted with adopted conservation plans/ programs designed to protect biological resources.	**S**	Implementation of **MMs BIO-1** through **BIO-11** (cited above). Implementation of **RCMs WQ-1** through **WQ-4** (cited under 3.10: Hydrology and Water Quality). Implementation of **RCM HAZ-1** (cited under 3.9: Hazards and Hazardous Materials).	**LTS**
3.5: Cultural Resources			
Threshold 3.5.2: Although there are no known archaeological resources on the Project site, due to the presence of identified cultural resources in the surrounding area, there is potential for construction and ground disturbing activities associated with the proposed Project to reveal previously unknown subsurface archaeological resources.	**S**	**MM CUL-1: Unanticipated Resources.** The Project grading permit shall state that the developer/permit holder or any successor in interest shall comply with the following for the life of the permit. If, during ground-disturbing activities, unanticipated cultural resources are discovered, the following procedures shall be followed: 1. All ground-disturbing activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened among the developer, the Project Archaeologist (as defined in MM CUL-2), the Native American tribal representative(s) from the consulting tribes (Pechanga Band of Indians [Pechanga] and Soboba Band of Luiseño Indians [Soboba], if the resource is determined to be Native American in origin), and the Community Development Director, or designee, to discuss the significance of the find (referred to hereafter as the "aforementioned parties").	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		2. The developer shall call the Community Development Director, or 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 made, with the concurrence of the Community Development Director, or designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the uncovered cultural resource. 4. Further ground disturbance shall not resume within the area of the find until a meeting has been convened with the aforementioned parties and a decision made, with the concurrence of the Community Development Director or their designee, as to the appropriate mitigation measure(s) for the uncovered cultural resource. 5. Treatment and avoidance of the newly discovered resources shall be consistent with the Tribal Monitoring Agreement entered into with Pechanga and Soboba. This may include avoidance of cultural resources through Project design, in-place preservation of cultural resources located in native soils, and/or reburial on the Project property so they are not subject to further disturbance in perpetuity as identified in a Non-Disclosure of Reburial Location measure. 6. Pursuant to California Public Resources Code (PRC) § 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the find is determined to be significant (as determined through concurrence of the aforementioned parties) and avoidance of the find cannot be achieved, a Phase III data recovery plan (an in-depth excavation and data collection and reporting process) shall be prepared by the Project Archeologist, in consultation with the consulting	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		tribe(s) if the resource is determined to be Native American in origin, and shall be submitted to the City for review and approval prior to implementation of said plan. 7. Pursuant to PRC § 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 (CEQA) with respect to archaeological resources and the recommendations of the Project Archaeologist, and shall take into account the cultural and religious principles and practices of the Consulting Tribe(s) and the Constitutional rights of the landowner and/or applicant. 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 Phase III data recovery plan and a final report detailing the significance and data recovery finding. **MM CUL-2: Archaeologist/Cultural Resource Monitoring Program.** Prior to issuance of grading permits, the Project Applicant/developer/permit holder shall provide evidence to the Community Development Department that a Secretary of Interior Standards qualified and certified Registered Professional Archaeologist (RPA) (Project Archaeologist) 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	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		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 to avoid the potential for impacts to unanticipated cultural resources. These measures shall include, but shall not be limited to, the following: • **Archaeological Monitor:** Methodology to determine the adequate number of qualified monitors that shall be present to ensure that all earthmoving activities of previously undisturbed soils are observed and shall be on site during all grading activities of 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 Pechanga and Soboba 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 CRMP; 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.	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		• **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 aforementioned parties and the Project Archaeologist, in consultation with the Tribal Monitor(s) (as applicable for a tribal resource), shall determine the significance of the discovered resources. The Community Development Director, or 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, based on the significance of the find. • **Phase IV Report:** A final archaeological report shall be prepared by the Project Archaeologist and submitted to the Community Development Director, or designee, prior to final construction. 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 Department of Parks and Recreation forms for all sites affected by the development; final disposition of the resources, including GPS data; and an artifact catalog and any additional recommendations. A final copy shall be submitted to the City, Project Applicant/developer, the South Coastal Information Center (SCIC), and the Consulting Tribe. **MM CUL-3: Cultural Resources Disposition.** The Project grading permit shall state that in the event Native American cultural resources are discovered during the course of grading	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		(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 developer/landowner and Consulting Tribe. 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 or 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, if feasible, 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. 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 (included in MM CUL-2). The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request. 3. If preservation in place or reburial are not feasible, the resources shall be curated in the culturally sensitive matter at a Riverside County curation facility that meets the requirements of the 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	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		transferred, including the title. Evidence of curation in the form of a letter from the curation facility stating that the subject archaeological materials have been received shall be provided by the landowner to the City of Lake Elsinore. 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 (included in MM CUL-2). Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to the City upon completion of a treatment plan and final report detailing the significance and treatment of the find. **MM 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), Pechanga and Soboba, that have requested monitoring through consultation with the City during the Assembly Bill (AB) 52 and/or the Senate Bill (SB) 18 process ("Monitoring Tribe(s)"). The Applicant shall coordinate with the tribe(s) to develop an individual Tribal Monitoring Agreement. A copy of the signed agreement 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, 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 the treatment and final disposition of any cultural resources, sacred sites, and human remains/burial goods discovered on the site per the tribes' (Pechanga and Soboba) customs and traditions and the City's	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		mitigation measures/conditions of approval. The Tribal Monitor will have the authority to stop and redirect grading within 100 feet (i.e., the "buffer area") of a find only for so long as is reasonably necessary to evaluate the find and determine the appropriate next steps, in consultation with the Project Archaeologist. Grading will be allowed to continue outside the buffer area. **MM CUL-5: Phase IV Report.** Upon completion of the tribal monitoring, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for ground-disturbing activities associated with this Project's grading. 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 the 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 copies shall be submitted to the SCIC, and one copy shall be submitted to the Monitoring Tribe. **MM 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 earthmoving activities within 100 feet of the find. The Project Applicant/developer 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	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		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 PRC Section 5097.98. **MM 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 shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.	
Cumulative Impact: A cumulatively considerable effect would occur if the project, in conjunction with cumulative projects, would result in a significant impact on archaeological resources, including historical resources pursuant to §15064.5, and human remains.	**S**	Implementation of **MMs CUL-1** through **CUL-7** (cited above).	**LTS**
3.6: Energy			
No significant impacts related to energy would occur. No Mitigation Measures or RCMs are required.			
3.7: Geology and Soils			
Threshold 3.7.1(ii): Construction and operation of the Project could directly or indirectly cause adverse effects involving seismic ground shaking.	**S**	**MM GEO-1: Compliance with California Building Code and Recommendations Provided in Geotechnical Evaluation.** Prior to issuance of grading and/or building permits, the Project Applicant shall provide evidence to the City of Lake Elsinore (City) for review and approval that the proposed Project site, industrial buildings, all ancillary structures and facilities, and associated infrastructure have been designed and would be constructed in	**LTS**

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		conformance with applicable provisions of the 2022 edition of the California Building Code (CBC), or the most current edition of the CBC in effect at the time the Project Applicant's development application is deemed complete by the City, as codified in Chapter 15.02 (California Building Standards Code) of the City of Lake Elsinore Municipal Code. Additionally, the Project Applicant shall provide evidence to the City that the recommendations cited in the project-specific Geotechnical Evaluation are incorporated into project plans. Geotechnical recommendations include, but are not limited to, removal and disposal of existing vegetation and deleterious materials, remedial grading and overexcavation, fill placement and compaction, slope construction, and slope stability mitigation by use to tieback anchors. Additional geotechnical recommendations are provided for building foundations, conventional and soil nail retaining walls, and pavements based on the site specific geotechnical and geological data. Retaining walls shall be designed and constructed in accordance with the geotechnical report and shall include appropriate drainage and waterproofing. Earthwork, over-excavation, and tieback anchor construction shall occur to depths specified in the Geotechnical Evaluation to provide a sufficient layer of engineered fill or densified soil beneath the structural footings/foundations, including the temporary removal and recompaction of on-site soils as fill, as well as proper surface drainage devices and erosion control and global stability of the cut slope. Updated global slope stability analysis shall be performed once 40-scale grading plans and soil nail wall plans are in development to verify geologic stability is acceptable. The findings, conclusions, and recommendations presented in the preliminary geotechnical report should be considered preliminary and will need to be confirmed/updated as part of a future 40-scale grading plan review report.	

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		Geotechnical observation and/or testing must be performed by the geotechnical engineer at the following stages: • During grading (key excavations, removal bottoms, remedial grading, fill placement, etc.); • Geologic mapping of cut slopes; • During installation of the tieback anchors and soil nail retaining wall; • During retaining wall backfill and compaction; • During utility trench backfill and compaction; • During precise grading; • After presoaking building pads and other concrete-flatwork subgrades, and prior to placement of aggregate base or concrete; • Preparation of pavement subgrade and placement of aggregate base; • After building and wall footing excavation and prior to placing reinforcement and/or concrete; and • When any unusual soil conditions are encountered during any grading or construction operation subsequent to issuance of the project-specific Geotechnical Evaluation. This measure shall be implemented to the satisfaction of the City of Lake Elsinore Director of Building and Safety, or designee.	
Threshold 3.7.1(iii): Construction and operation of the Project could directly or indirectly cause adverse effects involving ground failure, including liquefaction.	**S**	Implementation of **MM GEO-1** (cited above).	**LTS**
Threshold 3.7.1(iv): Construction and operation of the Project could directly or indirectly cause adverse effects involving ground failure, including landslides.	**S**	Implementation of **MM GEO-1** (cited above).	**LTS**

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Threshold 3.7.2: Construction and operation of the Project could result in substantial soil erosion or the loss of topsoil.	**LTS**	Implementation of **RCMs WQ-1** and **WQ-3** (cited under 3.10: Hydrology and Water Quality).	**LTS**
Threshold 3.7.3: Construction and operation of the Project could result in risk to structures and/or occupants from potentially unstable soils.	**S**	Implementation of **MM GEO-1** (cited above).	**LTS**
Threshold 3.7.4: Construction and operation of the Project could result in risk to structures and/or occupants from potentially expansive soils.	**S**	Implementation of **MM GEO-1** (cited above).	**LTS**
Threshold 3.7.6: Portions of the Project site are considered to have a high sensitivity for paleontological resources. Therefore, ground-disturbing activities associated with construction of the proposed Project that may impact undisturbed subsurface sediments have the potential to impact paleontological resources.	**S**	**MM GEO-2: Paleontological Resources.** Prior to issuance of grading permits, the Project Applicant shall solicit and implement a paleontological resource impact mitigation program during construction of the proposed Project. The mitigation program shall be prepared and implemented in accordance with the provisions of the California Environmental Quality Act (CEQA), as well as the 2010 guidelines of the Society of Vertebrate Paleontology, and shall include, but not be limited to, the following components: • Earthmoving operations within the project site that may impact paleontologically sensitive soils (which are present on some, but not all, portions of the Project site) shall be monitored by a qualified paleontological monitor. Since the ground surface has been previously disturbed, the monitoring program shall begin with daily "spot-checking" to ensure the timely identification of the previously undisturbed, potentially fossiliferous sediments when they are encountered. Once the depth of 3 feet is reached, or if potentially fossiliferous sediments are exposed sooner, all further earthmoving	**LTS**

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		operations shall be monitored continuously. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays and shall collect samples of sediments that are likely to contain fossil remains of small vertebrates or invertebrates. Additionally, the monitor shall have the power to temporarily halt or divert grading equipment to allow for the removal of abundant or large specimens. • Samples of potentially fossiliferous sediments shall be collected and processed to look for and recover small fossils that may be present. • All recovered paleontological specimens shall be identified to the lowest taxon possible and curated at a repository with permanent retrievable storage. • A report of findings, including an itemized inventory of any recovered specimens, shall be prepared upon completion of paleontological monitoring and sediment/specimen retrieval. The report must 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, will signify completion of the mitigation program. This measure shall be implemented the satisfaction of the City of Lake Elsinore Community Development Director, or designee.	
Cumulative Impact: A cumulatively considerable effect would occur if the Project, in conjunction with cumulative projects, would result in significant impacts from seismic activity, soil erosion, landslides, lateral spreading, subsidence, liquefaction, collapse, expansive soil, unsupported septic or other alternative wastewater disposal	**S**	Implementation of **MMs GEO-1** and **GEO-2** (cited above). Implementation of **RCMs WQ-1** and **WQ-3** (cited under 3.10: Hydrology and Water Quality).	**LTS**

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systems, or if impacts would occur to paleontological resources.			
3.8: Greenhouse Gas Emissions			
Threshold 3.8.1: The Project would generate 14,656.35 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. Project-related greenhouse gas (GHG) emissions would exceed the South Coast Air Quality Management District's (SCAQMD) 3,000 $MTCO_2e$ per year threshold. Thus, operation of the proposed Project would result in a significant impact for GHG emissions.	**S**	Implementation of **PDFs AQ-1** through **AQ-5** (cited under 3.3: Air Quality). Implementation of **MMs AQ-1** through **AQ-6 (**cited under 3.3: Air Quality). **MM GHG-1: Recycling Bins.** The Project plans and specifications shall require that, prior to receipt of occupancy permits, separate recycling bins be provided for each industrial building with the capacity to provide 60 percent diversion of waste from the site. **MM GHG-2: Drought-Tolerant Landscaping.** The Project plans and specifications shall include a requirement that all landscaping and trees throughout the Project site be drought-tolerant, low-water plants and shall use water with drip irrigation and weather-based smart irrigation controllers. **MM GHG-3: Exceed Energy-Efficient Building Requirements.** Prior to the issuance of building permits, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that the Project is designed to achieve energy-efficient buildings exceeding the 2022 Title 24 standards, with the following design criteria: 1. Building envelope insulation of conditioned space within the building shall be R15 or greater for walls and R30 or greater for attics/roofs. 2. Windows shall have an insulation factor of 0.28 or less Ufactor and 0.22 or less Solar Heat Gain Coefficient. 3. All roofing material shall be Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance. 4. All heating/cooling ducting within the buildings shall be insulated with R-4.2, R-8, or greater insulation.	**SU**

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		5. All heating and cooling equipment shall be Energy Efficient Ratio 14 percent Annual Fuel Utilization Efficiency, or 7.7 Heating Seasonal Performance Factor levels of efficiency or greater. 6. All water heaters shall be high-efficiency electric water heaters with a minimum 0.72 Energy Factor or greater. 7. Lighting within the building shall be high-efficiency LED lighting with a minimum of 60 lumens/watt for fixtures greater than 40 watts.	
Threshold 3.8.2: The Project would not conflict with local, regional, or statewide plans, policies, programs, and regulations that have been adopted for the purpose of reducing GHG emissions. Despite this consistency, the Project's long-term operational activities would generate GHG emissions that exceed the City's preferred threshold of 3,000 $MTCO_2e$ per year despite implementing Project design features and all feasible mitigation. Thus, the Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050), and a significant and unavoidable impact would occur.	**S**	Implementation of **PDFs AQ-1** through **AQ-5** (cited under 3.3: Air Quality). Implementation of **MMs AQ-1** through **AQ-6** (cited under 3.3: Air Quality). Implementation of **MMs GHG-1** through **GHG-3** (cited above).	**SU**

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Cumulative Impact: Since GHG is a global issue, it is unlikely that the proposed Project would generate enough GHG emissions to influence GHG emissions on its own; however, because Project-related CO_2e emissions would exceed the scaled SCAQMD thresholds even with mitigation, the proposed Project would have a significant contribution to cumulatively considerable GHG emission impacts.	**S**	Implementation of **PDFs AQ-1** through **AQ-5** (cited under 3.3: Air Quality). Implementation of **MMs AQ-1** through **AQ-6** (cited under 3.3: Air Quality). Implementation of **MMs GHG-1** through **GHG-3** (cited above).	**SU**
3.9: Hazards and Hazardous Materials			
Threshold 3.9.1: Construction and operation of the Project could create a significant hazard to the public or the environment from the transport, use, or disposal of hazardous materials.	**LTS**	Implementation of **RCMs WQ-1** through **WQ-4** (cited under 3.10: Hydrology and Water Quality). **RCM HAZ-1: Hazardous Materials Business Plan.** Prior to the issuance of a certificate of occupancy, the warehouse tenant(s)/end-user(s) within the Onsite Development Area that would handle hazardous materials and substances in reportable quantities as defined by California Health and Safety Code Section 25507(a) (1) through (8) shall submit proof to the City of Lake Elsinore Building and Safety Department that they have submitted a Hazardous Materials Business Plan (HMBP) via the California Environmental Reporting System (CERS). At minimum, the HMBP shall include facility information, a hazardous material inventory (including a site map/plan), and emergency response and training programs for employees. This measure shall be implemented to the satisfaction of the City of Lake Elsinore Director of Building and Safety, or designee.	**LTS**

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Threshold 3.9.2: Construction and operation of the Project could create a significant hazard to the public or the environment from the accidental release of hazardous materials into the environment because former agricultural operations could have resulted in unknown subsurface conditions on the Project site, which could include buried pipelines or irrigation channels, septic tanks, and/or other buried objects/debris that may contain asbestos or other hazardous materials.	**S**	Implementation of **RCMs WQ-1** through **WQ-4** (cited under 3.10: Hydrology and Water Quality). Implementation of **RCM HAZ-1** (cited above). **MM HAZ-1: Asbestos Abatement.** In the event subsurface irrigation pipes, septic facilities, or any other on-site features or materials suspected to contain asbestos are encountered during ground-disturbing activities, excavation within 60 feet of the material shall be halted, and the Project Applicant shall retain a qualified California Division of Occupational Safety and Health (Cal/OSHA) Certified Site Surveillance Technician to evaluate whether the feature(s) or material(s) warrant further assessment or remediation pursuant to Title 8, California Code of Regulations (CCR) Section 1529. Pipes and other features shall not be crushed until it is determined that they do not contain asbestos. In the event the City, through consultation with the Cal/OSHA Certified Site Surveillance Technician, determines the feature(s) or material(s) is not hazardous, no further remedial action is required, and the feature(s) or material(s) shall be disposed of in accordance with the Riverside County Department of Environmental Health (DEH). In the event the feature(s) or material(s) is deemed to contain asbestos, the Project Applicant shall retain a Certified Asbestos Consultant to provide a construction and demolition plan with disposal tickets from a Riverside County DEH Hazardous Materials Branch-approved disposal facility. As required, the Certified Asbestos Consultant shall prepare and submit Asbestos Notification to the South Coast Air Quality Management District In the event the feature(s) or material(s) is deemed to contain asbestos, the Project Applicant shall retain a Certified Asbestos Consultant to provide a construction and demolition plan with disposal tickets from a Riverside County DEH Hazardous Materials Branch-approved disposal facility. As required, the	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		Certified Asbestos Consultant shall prepare and submit Asbestos Notification to the South Coast Air Quality Management District (SCAQMD) for air clearances. The Certified Asbestos Consultant shall prepare an asbestos disposal report for City's review prior to final disposal. This measure shall be implemented to the satisfaction of the City of Lake Elsinore Community Development Director, or designee, and/or Building and Safety Division Director, or designee. **MM HAZ-2: Unanticipated Hazardous Materials.** Should grubbing, grading, or any other ground-disturbing activities reveal any discolored soils, noxious odors, and/or other buried objects/debris, the Project Applicant shall retain a consultant qualified under American Society for Testing and Materials (ASTM) International Standard E1527-13 to evaluate the conditions and provide specific procedures and recommendations that shall be adhered to during construction activities. The consultant will develop these procedures and recommendations based on the findings from the soil investigation and in accordance with applicable legal standards that are outlined below. If the qualified consultant determines the conditions are not hazardous, no further remedial action is required, and the material shall be disposed of in accordance with the Riverside County DEH. In the event the material/condition is deemed potentially hazardous, the qualified consultant shall conduct a soil investigation on the project site to assess the potential presence of hazardous materials. The soil investigation shall meet or exceed the standards of the California Department of Food and Agriculture and comply with the Maximum Residue Limits established in 40 Code of Federal Regulations 180 for any pesticide chemicals identified on the site. Construction may not	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		proceed until the extent and nature of the suspect material is determined by qualified personnel and in consultation with appropriate City staff. The removal and/or disposal of any hazardous material shall be conducted by a Cal/OSHA-licensed Hazardous Materials Substances Removal contractor in accordance with all applicable local, State, and federal standards to the degree that adequate public health and safety standards are maintained, to the reasonable satisfaction of the City. If warranted, the property owner may enter into a Voluntary Cleanup Plan (VCP) with the California Department of Toxic Substances Control (DTSC) to coordinate remediation of the site. If a VCP is established, the City shall enter into a memorandum of agreement with the DTSC to support and strengthen efforts to achieve protective cleanups under State oversight. The City shall ensure advanced payment of the cleanups is made by the City and/or Project Applicant and the City and/or Project Applicant is committed to paying all subsequent VCP costs, including those associated with DTSC's oversight. The VCP shall be managed by a Hazardous Substances Scientist or Hazardous Substances Engineer and shall include details about site conditions, proposed land use, and potential community concerns. In the VCP, the DTSC retains its authority to take enforcement action if, during the investigation or cleanup, it determines the site presents a serious health threat and proper and timely action is not otherwise being taken. When remediation is complete, the DTSC shall issue either a site certification of completion or a "No Further Action" letter, depending on the Project circumstances, which means the property is now ready for productive economic use.	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
Threshold 3.9.6: Construction and operation of the Project could interfere with an applicable emergency response plan or emergency evacuation plan.	**LTS**	Implementation of **RCM TRA-1** (cited under 3.17: Transportation). Implementation of **RCM FIRE-1** (cited under 3.20: Wildfire).	**LTS**
Threshold 3.9.7: Construction and operation of the Project could expose people or structures to impacts from wildfires.	**S**	Implementation of **RCM PS-1** (cited under 3.15: Public Services). Implementation of **MM FIRE-1** and **RCM FIRE-2** (cited under 3.20: Wildfire).	**LTS**
Cumulative Impact: Development of the proposed Project in conjunction with cumulative projects within a 1-mile radius has the potential to result in a cumulatively considerable impact related to hazards and hazardous materials during operation and construction.	**S**	Implementation of **MMs HAZ-1** and **HAZ-2** and **RCM HAZ-1.** Implementation of **RCMs WQ-1** through **WQ-4** (cited under 3.10: Hydrology and Water Quality). Implementation of **RCM PS-1** (cited under 3.15: Public Services). Implementation of **RCM TRA-1** (cited under 3.17: Transportation). Implementation of **MM FIRE-1** and **RCM FIRE-1** and **FIRE-2** (cited under 3.20: Wildfire).	**LTS**
3.10: Hydrology and Water Quality			
Threshold 3.10.1: Construction and operation of the Project could violate water quality standards.	**LTS**	**RCM WQ-1: Construction General Permit and Chapter 14.08 of the City of Lake Elsinore Municipal Code.** Prior to commencement of construction activities, the Project Applicant shall obtain coverage under the State Water Resources Control Board's (SWRCB) *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, *NPDES No. CAS000002, Order No. 2022-0057-DWQ* (Construction General Permit), or any other subsequent permit. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Stormwater Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the Construction	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		General Permit, to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the Project from the SMARTS and provided to the Director of the City of Lake Elsinore Public Works Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained and the Project is in compliance with Chapter 14.08 of the City of Lake Elsinore Municipal Code. Project construction shall comply with all applicable requirements specified in the Construction General Permit, including but not limited to: preparation of a SWPPP and implementation of construction site Best Management Practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the Project. The SWPPP shall identify the sources of pollutants that may affect the quality of stormwater and shall include BMPs (e.g., sediment control, erosion control, and good housekeeping BMPs) to control the pollutants in stormwater runoff. Upon completion of construction activities and stabilization of the Project site, a Notice of Termination shall be submitted via SMARTS. **RCM WQ-2: Groundwater Discharge Permit.** At least 45 days prior to groundwater dewatering activities, the Project Applicant shall submit an NOI to the Santa Ana Regional Water Quality Control Board (RWQCB) to obtain coverage under the Santa Ana RWQCB's *General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (de minimis) Threat to Water Quality, Order No. R8-2020-0006, NPDES No. CAG998001* (Groundwater Discharge Permit). The construction contractor shall comply with the requirements of Order No. R8-2020-0006, NPDES No. CAG998001. Groundwater dewatering activities shall comply with all applicable provisions	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination (NOT) shall be submitted to the Santa Ana RWQCB. **RCM WQ-3: Riverside County MS4 Permit.** Prior to the issuance of a grading permit, the Project Applicant shall submit a Final Water Quality Management Plan (WQMP) to the City of Lake Elsinore Engineer/Public Works Director, or designee, for review and approval. The Final WQMP shall specify the BMPs to be incorporated into the proposed Project design to target pollutants of concern in runoff from the Project site. The Final WQMP shall also incorporate the results of the Final Hydrology and Hydraulic Analyses to demonstrate that the detention facilities meet the hydromodification requirements of the *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024* (Riverside County MS4 Permit). The City Engineer/Public Works Director, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final Project design. **RCM WQ-4: Industrial General Permit.** Prior to issuance of a grading permit, the Project applicant shall certify and submit all PRDs for NOI and No Exposure Certification (NEC) coverage via the SWRCB's SMARTS website to obtain coverage under the Santa Ana Regional Water Quality Control Board's (RWQCB) *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. WQ 2014-0057-DWQ, as amended by Order No. WQ 2015-0122-DWQ and Order No. WQ 2018-0028-*	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		DWQ, NPDES No. CAS000001 (Industrial General Permit). The proposed BMPs to be incorporated into the proposed Project design shall comply with the requirements of the Industrial General Permit (e.g., capacity to capture and use, infiltrate, and/or evapotranspire up to and during the 85th percentile 24-hour precipitation event based on local, historical precipitation data). The capacity of the proposed LID BMPs shall be detailed in the Final WQMP prepared for the proposed Project.	
Threshold 3.10.3(i): Construction and operation of the Project could result in substantial erosion or siltation on site.	**LTS**	Implementation of **RCMs WQ-1** and **WQ-3** (cited above).	**LTS**
Threshold 3.10.3(iii): Construction and operation of the Project could substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.	**LTS**	Implementation of **RCMs WQ-1** and **WQ-3** (cited above).	**LTS**
Threshold 3.10.3(iii): Construction and operation of the Project could create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff.	**LTS**	Implementation of **RCMs WQ-1** and **WQ-3** (cited above).	**LTS**
Threshold 3.10.3(iv): Construction and operation of the Project could impede or redirect flood flows.	**LTS**	Implementation of **RCMs WQ-1** and **WQ-3** (cited above).	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
Threshold 3.10.4: Construction and operation of the Project could risk release of pollutants due to Project inundation in a flood hazard, tsunami, or seiche zone.	**LTS**	Implementation of **RCMs WQ-1** through **WQ-3** (cited above).	**LTS**
Cumulative Impact: Development of the proposed Project in conjunction with related cumulative projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff reaching water bodies within the Santa Ana River Watershed and the Temescal Basin Area, thereby resulting in cumulative impacts to hydrology and surface water quality. Cumulative impacts to groundwater supply could also occur due to increases in impervious surfaces that impair groundwater recharge and increases in consumptive uses of groundwater.	**LTS**	Implementation of **RCMs WQ-1** through **WQ-4** (cited above).	**LTS**
3.11: Land Use and Planning			
Threshold 3.11.2: Implementation of the Project has the potential to conflict with relevant goals and policies of the Lake Elsinore General Plan related to hazardous materials, wildfire hazards, seismic activity, water resources, and cultural and paleontological	**S**	Implementation of **PDFs AQ-3** through **AQ-5** (cited under 3.3: Air Quality). Implementation of **MMs AQ-1, AQ-3, AQ-4, AQ-5, AQ-9, AQ-10** (cited under 3.3: Air Quality). Implementation of **MMs BIO-1** through **BIO-11** (cited under 3.4: Biological Resources). Implementation of **MMs CUL-1** through **CUL-7** (cited under 3.5: Cultural Resources).	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
resources, as well as conflict with select recommendations of the City of Lake Elsinore Good Neighbor Policy related to Noise. In addition, the Project has the potential to conflict with the Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act guidance document related to air quality and noise. Finally, the Project could conflict with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).		Implementation of **MMs GEO-1** and **GEO-2** (cited under 3.7: Geology and Soils). Implementation of **RCM HAZ-1** (cited under 3.9: Hazards and Hazardous Materials) Implementation of **RCMs WQ-1** through **WQ-4** (cited under 3.10: Hydrology and Water Quality). Implementation of **RCM N-1** (cited under 3.13: Noise) Implementation of **RCM TRA-1** (cited under 3.17: Transportation). Implementation of **MM FIRE-1** and **RCM FIRE-2** (cited under 3.20: Wildfire).	
3.12: Mineral Resources			
No significant impacts to mineral resources would occur. No Mitigation Measures or RCMs are required.			
3.13: Noise			
Threshold 3.13.1: Construction of the Project may involve onsite concrete pouring activities during the more sensitive nighttime hours.	**LTS**	**RCM N-1:** Pursuant to Municipal Code Section 17.176.080[F], the construction contractor shall limit construction activities to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays. No construction shall take place outside of these hours, anytime on weekends, or on holidays. The construction contractor shall ensure all mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order. In addition, the construction contractor shall obtain prior authorization from the City for nighttime concrete pouring activities.	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
Cumulative Impact: Development of the proposed Project in conjunction with cumulative projects within the vicinity has the potential to result in a cumulatively considerable impact related construction noise and vibration.	**LTS**	Implementation of **RCM N-1** (cited above).	**LTS**
3.14: Population and Housing			
No significant impacts related to population or housing would occur. No Mitigation Measures or RCMs are required.			
3.15: Public Services			
Threshold 3.15.1(i): Construction and operation of the Project could increase demand on fire protection services such that new or physically altered facilities could be required, the construction of which could result in adverse physical impacts to the environment.	**LTS**	Implementation of **RCM TRA-1** (cited under 3.17: Transportation). Implementation of **RCM FIRE-2** (cited under 3.20: Wildfire). **RCM PS-1: Regulatory Fire Protection Measures.** In accordance with County of Riverside (County) ordinances and/or recognized fire protection standards, prior to the issuance of building permits, the Project Applicant shall provide documentation to the Director of the City of Lake Elsinore Building Department, or designee, that the following fire protection measures have been incorporated into the proposed Project plans: 1. **Fire Protection Water Supplies/Fire Flow:** Minimum fire flow for the construction of all buildings is required per California Fire Code (CFC) Appendix B. Prior to building permit issuance for new construction, the Applicant shall provide documentation to show there exists a water system capable of delivering the required fire flow. Specific design features may increase or decrease the required fire flow. Refer to CFC 507.3. 2. **Fire Protection Water Supplies/Hydrants:** The minimum number of fire hydrants required, as well as the location and spacing of fire hydrants, shall comply with CFC Appendix C and National Fire Protection Association (NFPA) 24. Fire hydrants shall be located no more than 400 feet from all	**LTS**

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		portions of the exterior of the building along an approved route on a fire apparatus access road, unless otherwise approved by the Riverside County Fire Department (RCFD). Fire hydrants shall be at least 40 feet from the building they are serving. A fire hydrant shall be located within 20 to 100 feet of the RCFD connection for buildings protected with a fire sprinkler system. The size and number of outlets required for the approved fire hydrants are 4" x 2 ½" x 2 ½" (super hydrant). Refer to CFC 507.5, CFC Appendix C, and NFPA 24. 3. **Fire Department Access:** Fire apparatus access roads shall be provided to within 150 feet of all exterior portions of buildings unless otherwise approved by the RCFD. Fire apparatus access roads shall have an unobstructed width of no less than 24 feet. Dead-end fire apparatus access roads in excess of 150 feet shall be provided with an approved turnaround. The minimum required turning radii of a fire apparatus access road are 38 feet outside radius and 14 feet inside radius. The construction of the fire apparatus access roads shall be all-weather and capable of sustaining 75,000 pounds. Unless otherwise approved, the grade of a fire apparatus access road shall not exceed 16 percent and the cross slope shall not exceed 2.5 percent. The angles of approach and departure for fire apparatus access roads shall be a maximum of 6 percent grade change for 25 feet of approach/departure. Refer to CFC 503.1.1, 503.2.1, as amended by the County, and Riverside County Office of the Fire Marshal Technical Policy #TP22-002.4. 4. **Fire Department Access Turnaround:** Dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with a bulb turnaround at the terminus measuring a minimum of 38 feet outside radius and 14 feet inside radius. Parallel parking around the perimeter of the bulb is acceptable provided the bulb's outside turning radius is increased by 8 feet. In lieu of a bulb, a hammerhead-type	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		turnaround is acceptable where the top of the "T" dimension is 120 feet with the stem in the center. Additional turnaround designs may be acceptable as approved by the RCFD. Refer to CFC 503.1.1, 503.2.1, as amended by the County, and Riverside County Office of the Fire Marshal Technical Policy #TP22-002. 5. **Secondary Access:** Unless otherwise approved by the RCFD, dead-end fire apparatus access roads shall not exceed 1,320 feet. Secondary egress/access fire apparatus access roads shall provide independent egress/access from/to the area or as otherwise approved by the RCFD. Secondary egress/access fire apparatus access roads shall be as remote as possible from the primary fire apparatus access road to reduce the possibility that both routes will be obstructed by a single emergency. Additional fire apparatus access roads based on the potential for impairment by vehicle congestion, condition of terrain, climatic conditions, anticipated magnitude of a potential incident, or other factors that could limit access may be required by the RCFD. Refer to CFC 503.1.2 and Riverside County Office of the Fire Marshal Technical Policy #TP22-002. 6. **Fire Department Building Construction Plan Review:** Submittal of construction plans to the RCFD will be required. Final fire and life safety conditions will be addressed when the RCFD reviews the plans. These conditions shall be necessary, reasonable, and based exclusively on the CFC, California Building Code (CBC), and related codes/standards adopted at the time of construction plan submittal. Refer to CFC 105.1. 7. **Fire Sprinkler System:** All new commercial buildings and structures 3,600 square feet or larger will be required to install a fire sprinkler system. Refer to CFC 903.2, as amended by the County. 8. **Fire Alarm and Detection System:** A water flow monitoring system and/or fire alarm system may be required as	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		determined at the time of building construction plan review. Refer to CFC 903.4 and CFC 907.2. 9. **Traffic Calming Devices:** Requests for the installation of traffic calming designs/devices on fire apparatus access roads shall be submitted and approved by the Fire Code Official. Refer to CFC 503.4.1. 10. **Gate Access:** All electronically operated gates shall be provided with Knox key switches and automatic sensors for access. These gates shall be provided with access to gate equipment or another method to open the gate if there is a power failure. (Manual gates shall not be locked unless a Knox Box containing the key to the lock is installed in an approved location on the approach side of the gate). A pedestrian gate, if used to provide access, shall be a minimum of 3 feet wide and provided with a Knox Box/padlock if locked. Refer to CFC 506.1. 11. **Fire Department Access Doors:** If high-piled storage will be utilized in the building, RCFD access doors may be required every 150 feet along all portions of the interior of the building that are along the fire apparatus access road. Refer to CFC 3206.7. 12. **Dock Loading:** Dock loading shall not impede RCFD access lanes. 13. **Addressing:** All commercial buildings shall display street numbers in a prominent location on the address side and additional locations as required. Refer to CFC 505.1 and County of Riverside Office of the Fire Marshal Standard #07-01. 14. **Water Plans:** The Applicant/developer shall furnish the water system fire hydrant plans to the RCFD for review and approval prior to building permit issuance. Plans shall be signed by a registered civil engineer and shall confirm hydrant type, location, spacing, and minimum fire flow. Once plans are signed and approved by the local water authority, the	

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		originals shall be presented to the RCFD for review and approval. Refer to CFC 105.4.1. 15. **Emergency Responder Communication Coverage Systems:** Projects that do not meet the exceptions set forth by the Riverside County Office of the Fire Marshal shall provide plans for an emergency responder radio coverage system. Refer to CFC 510.1 and Riverside County Office of the Fire Marshal Technical Policy #TP19-002. **RCM PS-2: Development Impact Fees, Chapter 16.74 of the City of Lake Elsinore Municipal Code.** Prior to the issuance of a certificate of occupancy by the City of Lake Elsinore Building Department, the most current Development Impact Fee (DIF) for commercial and industrial development shall be paid by the developer as calculated by the City. The building permits shall be issued by the City after proof of the appropriate DIF is paid.	
Threshold 3.15.1(ii): Construction and operation of the Project could increase demand on police protection services such that new or physically altered facilities could be required, the construction of which could result in adverse physical impacts to the environment.	**LTS**	Implementation of **RCM PS-2** (cited above).	**LTS**
Threshold 3.15.1(v): Construction and operation of the Project could increase demand on other public facilities such that new or physically altered facilities could be required, the construction of which could result in adverse physical impacts to the environment.	**LTS**	Implementation of **RCM PS-2** (cited above).	**LTS**

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
Cumulative Impact: Development of the proposed Project in conjunction with cumulative projects within the cumulative impact area for public services has the potential to result in a cumulatively considerable impact related to the need for new and/or maintenance of existing public services.	**LTS**	Implementation of **RCMs PS-1** and **PS-2** (cited above). Implementation of **RCM TRA-1** (cited under 3.17: Transportation). Implementation of **RCM FIRE-2** (cited under 3.20: Wildfire).	**LTS**
3.16: Recreation			
Threshold 3.16.1: Development of the proposed Project could 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.	**LTS**	Implementation of **RCM PS-2** (cited under 3.15: Public Services).	**LTS**
Cumulative Impact: Development of the proposed Project in conjunction with cumulative projects within the cumulative impact area for parks and recreation has the potential to result in a cumulatively considerable impact related to the need for new and/or maintenance of existing parks and recreational facilities.	**LTS**	Implementation of **RCM PS-2** (cited under 3.15: Public Services).	**LTS**

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
3.17: Transportation			
Threshold 3.17.4: Construction and operation of the proposed Project has the potential to affect emergency access and response times, due to temporary detour routes and temporary road/pedestrian/bicycle facility closures in the vicinity of the Project site.	**LTS**	**RCM TRA-1: Transportation Management Plan.** The construction contractor is required to prepare and implement a Transportation Management Plan (TMP) during construction of the proposed Project. The Draft TMP shall be reviewed and approved by the Director of the City of Lake Elsinore Engineering Department, or designee, prior to the initiation of construction. The TMP shall be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook* and shall include provisions to maintain traffic flow along Pierce Street, Baker Street, and Nichols Road; safe access into and out of the Project site; and emergency access to the Project site and adjacent areas during construction.	**LTS**
Cumulative Impact: Development of the proposed Project in conjunction with cumulative projects within the cumulative impact area for transportation has the potential to result in a cumulatively considerable impact related to emergency access.	**LTS**	Implementation of **RCM TRA-1** (cited above).	**LTS**
3.18: Tribal Cultural Resources			
Threshold 3.18.1(i): Due to the potential presence of tribal cultural resources on the Project site, the City engaged in formal consultation with the Pechanga Band of Indians and the Soboba Band of Luiseño Indians regarding the proposed Project and established mitigation measures and regulatory compliance measures to address unanticipated encounters with	**S**	Implementation of **MMs CUL-1** through **CUL-7** (cited under 3.5: Cultural Resources).	**LTS**

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
tribal cultural resources, including human remains.			
Threshold 3.18.1(ii): Due to the potential presence of tribal cultural resources on the Project site, the City engaged in formal consultation with the Pechanga Band of Indians and the Soboba Band of Luiseño Indians regarding the proposed Project and established mitigation measures and regulatory compliance measures to address unanticipated encounters with tribal cultural resources, including human remains.	**S**	Implementation of **MMs CUL-1** through **CUL-7** (cited under 3.5: Cultural Resources).	**LTS**
Cumulative Impact: A cumulatively considerable effect would occur if the Project, in conjunction with cumulative projects, would result in a significant impact on a Tribal Cultural Resource, defined in PRC Section 21074, Pursuant to PRC Sections 5020.1(k) and 5024.	**S**	Implementation of **MMs CUL-1** through **CUL-7** (cited under 3.5: Cultural Resources).	**LTS**
3.19: Utilities and Service Systems			
No significant impacts related to utilities and service systems would occur. No Mitigation Measures or RCMs are required.			
3.20: Wildfire			
Threshold 3.20.1: Construction and operation of the Project could impair implementation of an emergency response or evacuation plan.	**LTS**	Implementation of **RCMs PS-1** and **PS-2** (cited under 3.15: Public Services) Implementation of **RCM TRA-1** (cited under 3.17: Transportation). **RCM FIRE-1: Evacuation Education and Preparedness.** Pursuant to the "Ready, Set, Go!" approach adopted by California Department of Forestry and Fire Protection (CAL FIRE), the	**LTS**

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Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		property owner and/or property management company shall provide evidence to the Director of the City of Lake Elsinore Building Department, or designee, that the tenant has established an educational program for new employees during the onboarding process, through which informational brochures are provided, including an outreach and educational role to ensure fire safety measures detailed in the Project-specific Fire Protection Plan (FPP) prepared for the proposed Project by Dudek in 2025 have been implemented and development-wide "Ready, Set, Go!" plans have been prepared.	
Threshold 3.20.2: Construction and operation of the Project could exacerbate wildfire risks due to slope, prevailing winds, and other factors.	**S**	Implementation of **RCMs PS-1** and **PS-2** (cited under 3.15: Public Services). **MM FIRE-1: Fuel Modification Zone Maintenance.** Prior to May 1 of each year, the property owner and/or property management company shall hire a third-party, Riverside County Fire Department (RCFD) approved Fuel Modification Zone inspector to provide annual certification to the Director of the City of Lake Elsinore Building Department, or designee, that the maintenance completed throughout the Project site meets the requirements of the Project-specific Fire Protection Plan prepared by Dudek in 2025. **RCM FIRE-2: Adherence to the Fire Protection Plan.** Prior to the issuance of occupancy permits, the Director of the City of Lake Elsinore Building Department, or designee, shall confirm that the proposed Project adheres to the Project-specific FPP prepared for the proposed Project by Dudek in 2025 and implement the specific measures presented in the document, as required by the City's Municipal Code. The following measures shall be implemented to reduce impacts associated with wildfires: 1. The proposed Project buildings shall be constructed of ignition-resistant construction materials that resist ignition or sustained flaming combustion sufficiently to reduce losses	**LTS**

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
		from wildland-urban interface conflagrations under worst-case weather and fuel conditions with wildfire exposure of burning embers and small flames, as prescribed in California Building Code Chapter 7A and State Fire Marshal Standard 12-7A-5, Ignition-Resistant Materials. Buildings shall also include automatic fire sprinkler systems based on the latest adopted California Building and Fire codes for occupancy types. 2. Fuel modification shall be provided around the perimeter of both buildings, as required by Riverside County Fire Department (RCFD), and shall be a minimum of 100 feet wide in all directions through on-site Fuel Modification Zones (FMZs) or a combination of on-site and off-site FMZ equivalent areas. 3. Landscape plantings shall not utilize plants prohibited by the RCFD that have been found to be highly flammable. 4. Aerial fire apparatus access roads (i.e., public and private streets) shall be provided throughout the warehouse development and will vary in width and configuration, but shall all provide at least the minimum required unobstructed travel lanes, lengths, turnouts, turnarounds, width, and clearances required by applicable codes. Primary access and internal circulation shall comply with the requirements of the RCFD. 5. Water capacity and delivery shall be provided by a reliable water source for operations and during emergencies requiring extended fire flow. 6. Should future iterations of the Project's site plan result in buildings that do not achieve a minimum of 100 feet of defensible space, alternative materials and methods may be proposed to provide the functional equivalency of a full 100 feet of defensible space. Alternative materials and methods shall be to the satisfaction of the RCFD and may include structural hardening enhancements or landscape features, like noncombustible walls.	

Table ES.A: Summary of Potential Environmental Impacts, Mitigation Measures, Compliance Measures, and Level of Significance

Environmental Impact	Level of Significance Without Mitigation or Regulation	Mitigation Measure (MM) or Regulatory Compliance Measure (RCM)	Level of Significance with Mitigation and/or Regulation
Threshold 3.20.3: Construction and operation of the Project could exacerbate wildfire risks due to the installation or maintenance of infrastructure.	**LTS**	Implementation of **RCM FIRE-2** (cited above).	**LTS**
Threshold 3.20.4: Construction and operation of the Project could expose people or structures significant post-fire risks.	**S**	Implementation of **RCM FIRE-2** (cited above). Implementation of **MM GEO-1** (cited under 3.7: Geology and Soils). Implementation of **RCM PS-1** (cited under 3.15: Public Services).	**LTS**
Cumulative Impact: Project implementation, when considered along with the impacts of past, present, and reasonably foreseeable projects in the city of Banning, could result in a significant cumulative impact related to wildfire.	**S**	Implementation of **MM FIRE-1** and **RCMs FIRE-1** and **FIRE-2** (cited above). Implementation of **MM GEO-1** (cited under 3.7: Geology and Soils). Implementation of **RCMs PS-1** and **PS-2** (cited under 3.15: Public Services) Implementation of **RCM TRA-1** (cited under 3.17: Transportation).	**LTS**

Source: Compiled by LSA (2025).

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1.0 INTRODUCTION

1.1 OVERVIEW

This Environmental Impact Report (EIR) has been prepared utilizing information from planning and environmental documents from the City of Lake Elsinore (City), technical environmental studies, and other publicly available data. Alternatives to the proposed Project are discussed, and mitigation measures that would offset, minimize, or otherwise avoid significant environmental impacts from the proposed Project have been identified. This section of the EIR provides an overview of the California Environmental Quality Act (CEQA) process, outlines the document's format, summarizes public review of the EIR, identifies the environmental issues discussed in the EIR, and defines the parameters and data to be used in the analysis of cumulative impacts.

1.1.1 Lead Agency

CEQA requires the preparation of an EIR for any project that has the potential to significantly affect the environment.[1] The City of Lake Elsinore is the "… public agency which has the principal responsibility for carrying out or approving the proposed Project." As such, it is the "Lead Agency" pursuant to CEQA.[2] CEQA requires the Lead Agency to prepare, process, and consider the information contained in the EIR prior to taking any discretionary[3] action on the project.

Through its preliminary review of the proposed Project, the City has determined the proposed Project will have a potentially significant effect on the environment and, therefore, has required the preparation of this EIR. A primary purpose of this EIR is to provide decision makers and the public with information regarding the significant environmental effects associated with the Project; identify methods to reduce or eliminate significant direct, indirect, and cumulative Project impacts; and detail reasonable Project alternatives that would reduce any identified significant impacts.[4] The City will use and consider information in and supporting this EIR during the CEQA process and during the decision to approve, disapprove, or modify the proposed Project.

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1 Per *State CEQA Guidelines* §15360, "environment" is defined as the physical conditions that exist within the areas that will be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. The area involved shall be that in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.

2 *State CEQA Guidelines* §15367.

3 Per *State CEQA Guidelines* §15357, a "discretionary project" is defined as a project that requires the exercise of judgment or deliberation when a public agency decides to approve or disapprove a particular activity, as distinguished from situations where the public agency merely has to determine where there has been conformity with applicable statutes, ordinances, regulations, or other fixed standards. The key question is whether the public agency can use its subjective judgment to decide whether and how to carry out or approve a project.

4 Per *State CEQA Guidelines* §15126.6, "Alternatives," an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The EIR must reflect the independent judgement of the Lead Agency. LSA has prepared this EIR under the direction of City staff. When prepared by a party other than the Lead Agency, the EIR must be subjected to Lead Agency review and reflect the City's independent judgment.[5]

1.2 REGIONALLY SIGNIFICANT PROJECT

When an EIR is prepared for any project that is considered to be of statewide, regional, or areawide significance, the Draft EIR must be submitted to the appropriate metropolitan area council of governments for review and comment. A project is considered to be of statewide, regional, or areawide significance if it meets any of the following criteria:[6]

(1) A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

(2) A project that has the potential to cause significant effects on the environment extending beyond the city or county in which the project would be located. Projects of this nature would include:

   (a) A proposed residential development of more than 500 dwelling units.

   (b) A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.

   (c) A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.

   (d) A proposed hotel/motel development of more than 500 rooms.

   (e) A proposed industrial, manufacturing, processing plant, or industrial park planned to employ more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

(3) A project that would result in cancellation of an open space contract made pursuant the California Land Conservation Act of 1965 (Williamson Act) for any parcel of 100 or more acres.

(4) A project for which an EIR has been prepared that is located in and would substantially affect areas of critical environmental sensitivity.

(5) A project that would substantially affect sensitive wildlife habitats and habitats for endangered, rare, or threatened species.

[5] *State CEQA Guidelines* § 15084(e).
[6] *State CEQA Guidelines* § 15206.

(6) A project that would interfere with the attainment of regional water quality control standards as stated in the approved areawide waste treatment management plan.

(7) A project that would provide housing, jobs, or occupancy for 500 or more persons within 10 miles of a nuclear power plant.

The proposed Project would be considered a "project of statewide, regional or areawide significance" per criterion 2(e); therefore, the Notice of Preparation (NOP), Draft EIR, and Notice of Completion (NOC) will be transmitted to the appropriate metropolitan area council of governments (in this case, the Southern California Association of Governments [SCAG]) for review and comment.

1.3 ENVIRONMENTAL REVIEW PROCESS

CEQA (Public Resources Code [PRC] Section 21000, et seq.) requires that a public agency prepare an EIR when the public agency finds substantial evidence that the project may have a significant effect on the environment (PRC Section 21080(d)). Pursuant to the *State CEQA Guidelines,*[7] the basic purposes of CEQA are to:

- Inform governmental decision makers and the public about the potential significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

This EIR contains a detailed description of the proposed Project under consideration; establishes the existing environmental conditions of the Project site and adjacent areas; identifies the standards and thresholds against which environmental impacts are measured; assesses the environmental effects that would result from the proposed Project; identifies measures to reduce or eliminate significant environmental impacts; and evaluates alternatives that may reduce the impacts associated with the proposed Project.

7 *State CEQA Guidelines* §15002(a).

The recognized standard[8] is that an EIR analysis presents an adequate, complete, and good-faith effort to provide decision makers with the information to intelligently consider the environmental consequences of the project under consideration. While not requiring exhaustive evaluation, the EIR must include a "reasonably feasible" assessment of project impacts. Where disagreement among experts occurs, the EIR must detail the main points of disagreement.

The Draft EIR is distributed to public agencies and made available to the general public for review and comment. Upon completion of the public comment period, the Lead Agency prepares responses to comments received and, as appropriate, revises the EIR to accommodate minor corrections or modifications to the Draft EIR. The revised document, the Final EIR, must be certified by the Lead Agency prior to or in conjunction with the decision to approve the proposed Project.

The City, acting as the CEQA Lead Agency, will consider the information contained in this EIR in its evaluation of the Project. The information presented in the EIR does not serve to control the decision(s) related to the Project; rather, it fosters informed decision making and appropriate public participation.

In compliance with the *State CEQA Guidelines,* the City has taken steps to maximize opportunities for the public and other public agencies to participate in the environmental review process. The City conducted the scoping process and held a public scoping meeting, issued a NOP for the proposed Project, and determined that an EIR was required to evaluate the potentially significant environmental effects of the proposed Project and related actions. Further, this Draft EIR is subject to public review and comment. These topics related to the environmental review process are described in further detail below.

1.3.1 Notice of Preparation

The City, as the Lead Agency, issued an NOP for the Draft EIR on July 15, 2024, which was distributed via the State Clearinghouse (SCH). The SCH issued a project number for the EIR (SCH No. 2024070504). In accordance with *State CEQA Guidelines* §15082, the NOP was circulated to agencies and organizations that may provide comment on the Project's potential environmental impact(s) to the environment for a period of 30 days from July 19, 2024, to August 19, 2024, during which time written comments were solicited pertaining to environmental issues and topics that the EIR should evaluate.

Comments received during the public review of the NOP are summarized in Table 1.A and utilized to identify the potential environmental impacts addressed in Chapter 3.0 of this EIR. The NOP and all comments received during the public review period are provided in Appendices A-1 through A-3.

[8] Per *State CEQA Guidelines* §15151, an EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make a decision that intelligently takes into account environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good-faith effort at full disclosure.

Table 1.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments	Addressed in Section(s) of the EIR
Armando Veliz	7/5/2024	Armando Veliz: Requested the Project not be approved and raised concerns regarding traffic congestion and emissions.	3.3: Air Quality 3.8: Greenhouse Gas Emissions 3.17: Transportation
California Native Plant Society	7/10/2024	Aaron Echols and Arlee M. Montalvo: Recommended that the Draft EIR adequately address sensitive natural communities by including vegetation community mapping information, following standard statewide protocols, and including avoidance and mitigation measures to minimize impacts. In addition, the commenters requested a thorough analysis of impacts to rare plant species and analysis of alternatives.	3.4: Biological Resources
Jefrey Ong	7/10/2024	Jefrey Ong: Expressed concerns regarding air and noise pollution, local wildlife, the existing landscape, traffic congestion, property values, a change in community character, and strain on existing infrastructure, including roads, sewage systems, emergency services, and safety. The commenter recommends the above factors be carefully considered and alternatives be analyzed.	3.1: Aesthetics 3.3: Air Quality 3.4: Biological Resources 3.8: Greenhouse Gas Emissions 3.10: Hydrology and Water Quality 3.11: Land Use and Planning 3.13: Noise 3.15: Public Services 3.17: Transportation 3.19: Utilities/Service Systems 5.0: Alternatives
CDFW	7/14/2024	Kim Freeburn: Recommended that the Draft EIR include a complete assessment of biological resources, including flora and fauna, sensitive populations, cumulative impacts, mitigation measures, and compliance with the Western Riverside County MSHCP and Stephen's Kangaroo Rat Habitat Conservation Plan, including appropriate conservation of Crotch's bumble bee and other special-status species. In addition, the commenter recommended that the Draft EIR include an analysis of alternatives, State objectives, and compliance with the Lake and Streambed Alteration program. The commenter also recommended native landscaping and compliance with all applicable regulations and fees.	3.1: Aesthetics 3.4: Biological Resources 3.10: Hydrology and Water Quality 5.0: Alternatives
Endangered Habitats League	7/15/2024	Dan Silver: Raised concerns regarding the proposed Project's conformance with the Western Riverside MSHCP and requested an alternatives analysis, MSHCP conformance, and to retain EHL on all notification and distribution lists.	3.1: Aesthetics 3.4: Biological Resources 5.0: Alternatives
Riverside County Department of Waste Resources	7/15/2024	Katherine Avila: Requested that the Draft EIR consider the Project's waste generation and provided information to be used in the analysis of solid waste impacts. In addition, the commenter recommended hazardous waste be transported and disposed of in accordance with regulatory policies and suggested the Draft EIR incorporate provided measures to comply with State regulations regarding solid waste.	3.9: Hazards and Hazardous Materials 3.19: Utilities and Service Systems

Table 1.A: Notice of Preparation Comments Received

Agency/ Organization/ Individual	Date	Comments	Addressed in Section(s) of the EIR
Lee & Associates	7/16/2024	Chris Coyte: Raised concerns regarding impacts to their property and the location or replacement of SCE utility equipment, and requested updates on the Project.	3.19: Utilities and Service Systems
California Department of Justice's Bureau of Environmental Justice	7/17/2024	Christie Vosburg for Rob Bonta: Raised concerns regarding the Project's potential impacts to air quality and public health, noise, and traffic circulation in the Project vicinity. In addition, the commenter recommended that a priority be placed on avoiding and/or mitigating land use conflicts and air quality impacts, and provided a document containing best practices and mitigation measures for warehouse projects.	3.3: Air Quality 3.8: Greenhouse Gas Emissions 3.11: Land Use and Planning 3.13: Noise 3.17: Transportation
Briana Sara and Elliot Ruhland	7/19/2024	Briana Sara and Elliot Ruhland: Expressed opposition to the Project and raised concerns regarding air quality, traffic congestion, wildlife and ecosystems, noise, exposure to hazardous materials, and health and safety. In addition, the commenters requested alternatives be analyzed.	3.3: Air Quality 3.4: Biological Resources 3.8: Greenhouse Gas Emissions 3.9: Hazards and Hazardous Materials 3.13: Noise 3.17: Transportation 5.0: Alternatives
NAHC	7/19/2024	Andrew Green: Detailed State procedures for compliance with Assembly Bill 52, Senate Bill 18, and other State regulations related to tribal resources and CEQA.	3.5: Cultural Resources 3.18: Tribal Cultural Resources
SCAQMD	7/19/2024	Sam Wang: Recommended that the Draft EIR include an adequate analysis regarding air quality and GHGs, utilize SCAQMD's *CEQA Air Quality Handbook,* and comply with all applicable regulations. In addition, the commenter recommended the Draft EIR consider including provided mitigation measures to reduce air quality and GHG impacts.	3.3: Air Quality 3.6: Energy 3.8: Greenhouse Gas Emissions
Riverside Transit Agency	7/23/2024	Mauricio Alvarez: Had no comments on the Project.	N/A
Lake Elsinore Historical Society	8/18/2024	Kimberly G. McElroy: Discussed the location of the Project site in the vicinity of the old city of Terra Cotta and its clay works plant, acknowledged that the Lake Elsinore History Museum has no objection to the Project, and requested any artifacts of interest be given to the museum for display.	3.5: Cultural Resources

Source: Compiled by LSA (2025).
Notes: All NOP response letters are included in Appendix A of the EIR.
CEQA = California Environmental Quality Act
EHL = Endangered Habitats League
GHG = greenhouse gas
MSHCP = Multiple Species Habitat Conservation Plan
N/A = not applicable
NOP = Notice of Preparation
SCAQMD = South Coast Air Quality Management District
SCE = Southern California Edison

1.3.2 Scoping Meeting Summary

The City held a public scoping meeting to present the proposed Project and solicit input from interested parties regarding environmental issues that should be addressed in the Draft EIR. Notice of

the Public Scoping Meeting was published in *The Press-Enterprise* on July 15, 2024, providing the appropriate instructions for public participation in the scoping meeting. The in-person scoping meeting was held August 1, 2024, at 6:00 p.m., at the Lake Elsinore Cultural Center, 183 North Main Street, Lake Elsinore, CA 92530. It included a presentation providing a summary of the Project, required actions, and the environmental review process. Attendees of the public scoping meeting expressed general concern about the local air quality and circulation network in the Project vicinity. No comment cards were submitted to the City during the public scoping meeting.

1.3.3 Native American Consultation

The Native American Heritage Commission (NAHC) was contacted on September 14, 2023, to conduct a Sacred Lands File (SLF) search and provide a Native American Contact List for the Project site pursuant to Assembly Bill (AB) 52. The NAHC responded on November 9, 2023, stating that the SLF identified unspecified Native American cultural resources within the Project site and surrounding areas and provided a list of Native American groups to be consulted for further information. The NAHC recommended contacting 34 Native American individuals associated with 18 local tribes to potentially provide information regarding cultural resources that could be affected by the proposed Project.

As part of the AB 52 consultation process, the City sent consultation initiation request letters to the following Native American tribes on March 6, 2024:

- Agua Caliente Band of Cahuilla Indians
- Morongo Band of Mission Indians
- Pechanga Band of Indians
- Rincon Band of Luiseño Indians
- Soboba Band of Luiseño Indians
- Torres Martinez Desert Cahuilla Indians

Of the tribes notified, the Rincon Band of Luiseño Indians, the Pechanga Band of Indians, and the Soboba Band of Luiseño Indians requested formal government-to-government consultation under AB 52. Consultation meetings were held on May 9, 2024, with the Rincon Band of Luiseño Indians, on June 24, 2024, with the Soboba Band of Luiseño Indians, and on May 8, 2024, with the Pechanga Band of Luiseño Indians. Subsequent consultation meetings were held with the Pechanga Band of Indians on December 19, 2024, April 22, 2025, and October 14, 2025, with Soboba Band of Luiseño Indians on December 17, 2024, April 17, 2025, and October 8, 2025, and with Rincon Band of Luiseño Indians on July 23, 2025. The City concluded consultation with the Rincon Band of Luiseño Indians on July 31, 2025, the Soboba Band of Luiseño Indians on November 24, 2025, and with the Pechanga Band of Indians on November 26, 2025.

Additional detail regarding Native American consultation for the proposed Project is provided in Section 3.18 of this EIR.

1.3.4 Draft Environmental Impact Report

This Draft EIR is being distributed to numerous public agencies and other interested parties for review and comment as required by CEQA. The Draft EIR is available on the City's website, which is provided below:

- https://www.lake-elsinore.org/305/CEQA-Documents-Available-for-Public-Revi

All comments received from agencies and individuals on the Draft EIR will be accepted during the public review period, which will not be less than 45 days, in compliance with CEQA. All comments on the Draft EIR should be sent to the following City contact person:

Nancy Huynh, Principal Planner
nhuynh@lake-elsinore.org
City of Lake Elsinore
Community Development Department
301 North Spring Street
Lake Elsinore, California 92530
(951) 674-3124

Comments will only be accepted in written form via email and/or hard-copy letter delivered to the above-referenced email and/or mailing addresses, respectively. After the public review and comment period, written responses to all comments received pertaining to environmental issues will be prepared as part of the Final EIR. As required by CEQA, responses to comments submitted by responsible public agencies will be distributed to those agencies for review (in accordance with Section 15088 of the *State CEQA Guidelines*) at least 10 days prior to consideration and approval of the Final EIR by the City Council. Upon completion of the Final EIR and other required documentation, the City Council may certify the Final EIR, adopt findings relative to the proposed Project's environmental effects after implementation of mitigation measures, and approve or deny the Project.

1.4 SCOPE OF THIS DRAFT ENVIRONMENTAL IMPACT REPORT

This Draft EIR has been prepared to evaluate the environmental impacts that may result from implementation of the proposed Project. As the Lead Agency, the City has the authority for preparation of this Draft EIR and, after the comment/response process, certification of the Final EIR and approval of the proposed Project as described in this Draft EIR.

The City has the authority to make decisions on discretionary actions relating to development of the proposed Project. As previously stated, this Draft EIR is intended to serve as an informational document to be considered by the City during deliberations on the proposed Project. This Draft EIR evaluates and mitigates a reasonable worst-case scenario of potential impacts associated with the proposed Project.

As previously stated, the City is the Lead Agency for the proposed Project under CEQA (*State CEQA Guidelines §*15367). CEQA requires the Lead Agency to consider the information contained in the EIR prior to taking any discretionary actions. This Draft EIR provides information to the Lead Agency and other public agencies, the general public, and decision makers regarding the potential environmental

impacts from construction and operation of the proposed Project. The purpose of the public review of the Draft EIR is to evaluate the adequacy of the environmental analysis in terms of compliance with CEQA. Section 15151 of the *State CEQA Guidelines* states the following regarding standards from which adequacy is judged:

> "An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. The courts have not looked for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Under CEQA (PRC Section 21002.1[a]):

> "The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided."

An EIR is the most comprehensive form of environmental documentation identified in CEQA and the *State CEQA Guidelines* and provides the information needed to assess the environmental consequences of a proposed project. EIRs are intended to provide an objective, factually supported, full-disclosure analysis of the environmental consequences associated with a proposed project that has the potential to result in significant, adverse environmental impacts.

1.5 FORMAT OF THE DRAFT ENVIRONMENTAL IMPACT REPORT

The format of this EIR is provided below.

Executive Summary

The Executive Summary (1) provides a summary of the Project; (2) identifies potentially significant impacts, mitigation measures, and the level of significance of each impact following mitigation; and (3) provides a description of Project alternatives.

Chapter 1.0: Introduction

Chapter 1.0 (1) outlines the EIR document's format, including technical appendices; (2) describes the purpose of the EIR, including the legal purpose of CEQA, the intended use of an EIR, and the EIR's incorporated documents and referenced technical reports; (3) summarizes the public review of the EIR to date; (4) identifies environmental issues that are discussed; and (5) defines the cumulative analysis provided in the EIR.

Chapter 2.0: Project Description

Chapter 2.0 details the geographical setting, Project location, Project setting, applicable land use and zoning designations, Project characteristics, Project objectives, and discretionary actions required to implement the proposed Project.

Chapter 3.0: Environmental Analysis, Impacts, and Mitigation Measures

Chapter 3.0 provides a detailed analysis of each environmental issue. Evaluation of each issue follows the following format:

- **Summary:** Provides an introduction to the issue to be discussed, summarizing the content of the analysis to follow. This section identifies the specific reference material utilized in the environmental analysis.

- **Scoping Process:** Contains a brief summary of comments received in response to the NOP for the issue to be discussed.

- **Methodology:** Provides a brief summary of the methods and resources utilized in the preparation of the environmental analysis.

- **Existing Environmental Setting:** Identifies the existing local and regional environmental conditions (natural and built) in existence at the time the EIR was prepared. Existing setting information provides the reader with the "baseline" from which future impacts are analyzed and provides a standard against which to measure these impacts.

- **Regulatory Setting:** Details the federal, State, and local regulations, ordinances, and policies applicable to the issue area under discussion.

- **Thresholds of Significance:** Provides the criteria against which the relative significance of impacts resulting from Project implementation are measured.

- **Project Impacts:** Focuses on the potential short-term, long-term, and cumulative impacts of the Project. For those issues where no impact or a less than significant impact would occur, either (1) no mitigation would be required, or (2) adherence to established regulations, standards, and policies would sufficiently mitigate Project impacts to below the established significance threshold.

  In instances when the implementation of measure(s) cannot eliminate or reduce a Project impact to below established significance thresholds, the impact will be identified as "Significant and Unavoidable."

- **Cumulative Impacts:** Focuses on the potential environmental effect of the proposed Project combined with the effects of reasonably foreseeable cumulative projects within the Project study area.

Chapter 4.0: Other CEQA Considerations

Chapter 4.0 contains discussions of additional topics required by CEQA, including effects found to be significant and unavoidable, as well as irreversible environmental changes caused by the Project.

Chapter 5.0: Alternatives

Chapter 5.0 contains discussion of alternatives to development of the proposed Project. As allowed by CEQA, the impacts of these alternatives are evaluated at a more general level than the analyses of the proposed Project contained in Chapter 3.0. This chapter also evaluates the proposed effects of the No Project Alternative and identifies the environmentally superior alternative.

Chapter 6.0: List of Preparers and Persons Consulted

Chapter 6.0 identifies City and consultant staff who participated in the preparation and review of the EIR.

Chapter 7.0: References

Chapter 7.0 identifies the references used in the preparation of the EIR, the persons contacted, and the other source material.

Appendices

The Appendices contain the NOP, NOP comment letters, and public scoping meeting information; the various technical studies that support the EIR analysis; referenced materials; and other relevant material utilized during the preparation of the EIR.

1.6 DOCUMENTS INCORPORATED BY REFERENCE

CEQA permits the incorporation by reference of all or portions of other documents that provide information relevant to the Project and the environmental analysis.[9] Documents incorporated by reference must be available for public review at an office of the Lead Agency or other public building. The documents identified below are incorporated by reference, and where relevant, the information therein has been summarized throughout the EIR.

1.6.1 City of Lake Elsinore

1.6.1.1 City of Lake Elsinore General Plan (2011)

The State of California mandates that every city and county adopt a General Plan. The City's General Plan is considered its blueprint for the future. It lays out the vision for how the city would develop, with a planning horizon of 2030. The plan contains many goals designed to help City officials and the community preserve their past while building a future that enhances the quality of life for all age groups. The City's General Plan was adopted in December 2011.

[9] *State CEQA Guidelines* §15150.

The City's General Plan is available at the City's Community Development Department and can be accessed online at the following location:

- https://www.lake-elsinore.org/465/Lake-Elsinore-General-Plan

1.6.1.2 City of Lake Elsinore General Plan Final EIR (2011)

The City's General Plan Final EIR summarizes the potential environmental impacts associated with implementation of the City's General Plan, including growth-inducing and cumulative impacts. The Final EIR was certified by the Lake Elsinore City Council on December 11, 2011. As appropriate, the analysis and mitigation identified in the General Plan Final EIR has been incorporated into this EIR.

The City's General Plan Final EIR is available at the City's Community Development Department and can be accessed online at the following location:

- https://www.lake-elsinore.org/467/General-Plan---Certified-EIR

1.6.2 Technical Studies and Plans

A number of technical Project-related reports have been prepared to assess specific issues that may result from the construction and operation of the Project. As relevant, the EIR analysis is supported by information obtained from the following technical studies, which have been included as appendices to this EIR (listed in order of appearance.)

- **Appendix A:** Notice of Preparation/Scoping Information
  - **A-1:** Notice of Preparation
  - **A-2:** Notice of Preparation Comment Letters
  - **A-3:** Scoping Meeting Presentation
- **Appendix B:** Visual Impact Assessment
- **Appendix C:** Air Quality Technical Documentation
  - **C-1:** Air Quality Impact Analysis
  - **C-2:** Health Risk Assessment
- **Appendix D:** Biological Resources Technical Documentation
  - **D-1:** Biological Technical Report
  - **D-2:** Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis
  - **D-3:** California Department of Fish and Wildlife (CDFW) Correspondence
- **Appendix E:** Cultural Resources Technical Documentation
  - **E-1:** Cultural Resources Report (Confidential: Not for Public Distribution)[10]
  - **E-2:** Cultural Resources Report Addendum (Confidential: Not for Public Distribution)[11]

[10] Available for review at Lake Elsinore City Hall (130 S Main Street, Lake Elsinore, CA 92530).
[11] Available for review at Lake Elsinore City Hall (130 S Main Street, Lake Elsinore, CA 92530).

- **Appendix F:** Energy Tables
- **Appendix G:** Geology and Soils Technical Documentation
  - **G-1:** Geotechnical Evaluation
  - **G-2:** Paleontological Resources Report
  - **G-3:** Paleontological Resources Report Addendum
- **Appendix H:** Greenhouse Gas Analysis
- **Appendix I:** Phase I Environmental Site Assessment (ESA)
- **Appendix J:** Hydrology and Water Quality Technical Documentation
  - **J-1:** Preliminary Drainage Report
  - **J-2:** Preliminary Water Quality Management Plan (WQMP)
  - **J-3:** Water Supply Assessment
- **Appendix K:** Good Neighbor Policy Consistency Memorandum
- **Appendix L:** Noise and Vibration Analysis
- **Appendix M:** Economic Benefit Analysis
- **Appendix N:** Transportation Technical Documentation
  - **N-1:** Scoping Agreement for Traffic Impact Study
  - **N-2:** Vehicle Miles Traveled (VMT) Screening Memorandum
- **Appendix O:** Elsinore Valley Municipal Water District (EVMWD) Will-Serve Letter
- **Appendix P:** Fire Protection Plan

1.7 MITIGATION MONITORING AND REPORTING PROGRAM

When mitigation measures are required to avoid or reduce the severity of significant impacts, State law requires the adoption of a Mitigation Monitoring and Reporting Program (MMRP). The monitoring program is intended to ensure compliance during implementation of the program. An MMRP will be prepared for this EIR to comply with the requirements of State law[12] and will be considered by the City Council concurrent with certification of the Final EIR for the proposed Project.

[12] Public Resources Code §21081.6.

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2.0 PROJECT DESCRIPTION

This chapter describes the proposed Baker Street Warehouse Project ("proposed Project" or "Project") that is evaluated in this Environmental Impact Report (EIR) in conformance with the California Environmental Quality Act (CEQA) Guidelines.[1] The following includes a description of the geographic setting, the Project location, the Project setting, relevant General Plan and zoning designations, Project characteristics, Project objectives, and discretionary actions required to implement the proposed Project. The Project description is used as the basis for analyzing the proposed Project's impacts on the existing physical environment in Section 3.0 of the EIR.

2.1 PROJECT OVERVIEW

The Project site is situated in the northwestern portion of the city of Lake Elsinore on 140.04 gross acres. The Project applicant (Riverside Legacy IV Nichols Road, LLC) seeks to entitle and permit development of the Project site with two warehouses totaling 1,000,451 square feet on 65.81 acres; implement 37.86 acres of off-site improvements; dedicate 33.65 acres as a natural restoration area; and provide a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area. The City of Lake Elsinore (City) is the Lead Agency for the Project.

As detailed in Section 2.4, below, the 140.04-acre Project site consists of four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities; and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

As detailed in Section 2.5, below, the requested Project entitlements include the following applications: a zone change to amend the zoning of the Limited Manufacturing (M-1) portion of the Onsite Development Area to General Manufacturing (M-2) to achieve consistent zoning of the site; Industrial Design Review and a Tentative Parcel Map to merge the 10 existing parcels of the Onsite Development Area into two parcels; a Conditional Use Permit for M-2 uses within 300 feet of a residential district; a Conditional Use Permit to exceed the 45-foot maximum building height in the M-2 zone; and actions by the City of Lake Elsinore (e.g., grading permit, off-site street and utility permits, and building permit).

2.2 PROJECT LOCATION

The following describes the location and boundaries of the proposed Project, including its geographic context, and provides a brief overview of the existing land uses within and in the vicinity of the Project site.

[1] *CEQA Guidelines,* § 15124.

2.2.1 Local and Regional Location

The Project site is situated in the northwestern portion of the city of Lake Elsinore, Riverside County, California. The city lies at the foot of the Cleveland National Forest, within the southwest portion of Riverside County. Regional access to the city is provided by Interstate (I-) 15, which is a north-south transportation facility, and State Route (SR-) 74, a northwest-southeast transportation facility. Both transportation facilities are regionally important and connect the city of Lake Elsinore to the greater Riverside area. Lake Elsinore, which gives the city its name, is in the southwest portion of the city and is the largest natural lake in Southern California. Lake Elsinore supports recreational activities such as boating, wakeboarding, parasailing, fishing, water skiing, jet skiing, windsurfing, and camping at local campgrounds and RV resorts.

The city is bound by unincorporated Riverside County to the north, west, and south; the city of Wildomar to the southeast; and the cities of Canyon Lake and Menifee to the east. The City's General Plan covers 46,564 total acres, including 27,747 acres within existing city limits and 18,818 acres within the City's Sphere of Influence.[2]

2.2.2 Project Site Location

The 140.04-acre Project site is approximately 500 feet west of I-15 and approximately 0.5 mile northwest of SR-74, immediately southwest and southeast of the intersection of Baker Street and Pierce Street in the northwestern portion of the city of Lake Elsinore, in Riverside County, California. The Project site consists of the following Assessor's Parcel Numbers (APNs): 378-020-012, 378-020-014, 378-020-015, 378-020-016, 378-020-024, 378-020-028, 378-020-029, 378-020-030, 378-020-031, 378-020-033, 378-020-034, 378-020-036, 378-020-037, 378-020-038, 378-020-039, 378-020-040, 378-020-041, 378-020-042, 378-020-043, 378-020-048, 378-020-054, 378-114-064, 389-080-058, and 389-080-013. The site is located within the Rancho La Laguna (Stearns land grant), Township 5 South, Range 5 West, of the United States Geological Survey (USGS) 7.5-minute series *Lake Elsinore, California* quadrangle, San Bernardino Baseline and Meridian. The approximate center of the Project site is at latitude 33°42'3.12" north and longitude 117°21'42.67" west. Figure 2-1 depicts the Project site's location.

2.3 EXISTING SETTING

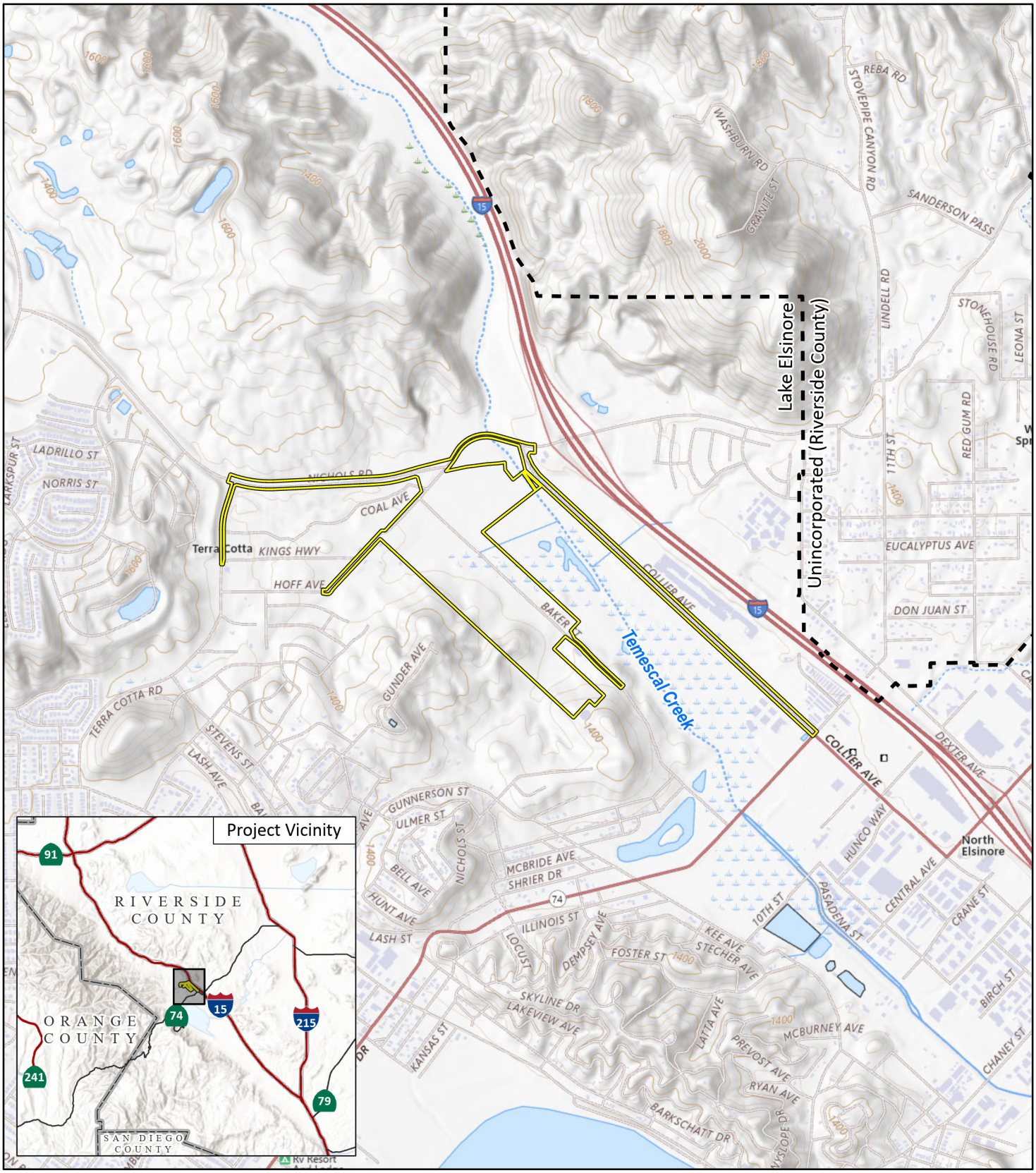
The following describes the existing physical setting, land use designations, and zoning of the Project site and surrounding properties.

2.3.1 Project Site Conditions

2.3.1.1 Site Characteristics and Current Site Conditions

The 140.04-acre Project site is irregular in shape, consists of undeveloped land and public road ROWs, and has a history of limited agriculture use. The Project site includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the

[2] City of Lake Elsinore. 2011. *City of Lake Elsinore General Plan.* Chapter 2.0, Community Form. December 11.



LSA

Project Location

City Boundary

FIGURE 2-1

N

0 1000 2000

FEET

SOURCE: USGS The National Map (2019)

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Baker Street Warehouse Project

Project Location

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Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Additionally, the Project site includes three easements maintained by Southern California Edison (SCE): a 330-foot-wide subtransmission easement traversing the site generally in a northeast/southwest alignment between Building 1 and Building 2 of the Onsite Development Area, a 10-foot-wide distribution circuit easement traversing the site generally in a northeast/southwest alignment through a proposed parking lot on the southeast side of Building 2 within the Onsite Development Area, and a 20-foot-wide distribution circuit easement that proceeds along the south side of Baker Street. These SCE easements would be maintained in accordance with SCE's land use guidelines (refer to Figure 2-5, provided later in this section).

The Project site has a history of limited agriculture use; however, no agricultural uses currently exist on the site. Elevations within the Project site range approximately between 1,260 feet and 1,400 feet above mean sea level, inclining gradually to the north and the southwest, with the lowest elevations in the central portion. Vegetation on the Project site consists of species that are characteristic of the Coastal Sagebrush community, including California sagebrush, buckwheat, black sage, white sage, lilac, datura, and chollas, as well as introduced weeds and landscaping plants such as tumbleweed and eucalyptus. Elevations within the Project site range approximately between 1,260 feet and 1,400 feet above mean sea level, inclining gradually to the north and the southwest, with the lowest elevations in the central portion. Figure 2-2 depicts an aerial photograph of the Project site.

2.3.1.2 Surrounding Land Uses

Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an above-ground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses are located outside of the Project site limits.

- **North:** Undeveloped, vacant land is located north of Nichols Road and the Project site. A paving and building materials supplier/mineral resources extraction site (Martin Marietta – Lake Elsinore Asphalt and Chandler Aggregates, Inc. – Nichols Road) is located approximately 0.3 mile northeast of the Project site, across I-15.

- **East:** Property adjacent to the east of the Project site consists of undeveloped, vacant land. A wetland area is located between the Project site and Collier Avenue. Commercial land uses are located east of Collier Avenue, followed by I-15. Undeveloped, vacant land and Temescal Valley High School are located east of I-15, and, as discussed above, Nichols Canyon Mine (91-33-0098) is approximately 0.3 mile northeast of the Project site.

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LSA

Project Site

City Boundary

FIGURE 2-2

N

0 830 1660

FEET

SOURCE: Nearmap (10/12/2025)

Baker Street Warehouse Project

Aerial Photograph of the Project Site

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- **South:** Property adjacent to the south of the Project site consists of generally undeveloped, vacant land that contains a water tank operated by the Elsinore Valley Municipal Water District (EVMWD), followed by single-family residential land uses. SR-74 is located approximately 0.5 mile south of the Project site, and Lake Elsinore is 1 mile south of the Project site.

- **West:** Property adjacent to the west of the Project site consists of a combination of undeveloped, vacant land and rural residential uses; graded pads for a residential tract; and the Fogarty Substation, followed by single-family residential land uses.

Figure 2-2 depicts the Project site in relation to surrounding properties.

2.3.2 Current Zoning and General Plan Designations

This section describes the existing land use and zoning designations of the Project site and adjacent properties.

2.3.2.1 Project Site

The Project site has General Plan Land Use designations of Limited Industrial and Floodway and zoning designations of Limited Manufacturing (M-1), General Manufacturing (M-2), and Open Space/Floodway (OS).[3] As it relates to the proposed Project, the Limited Industrial Land Use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses" at a maximum floor area ratio (FAR) of 0.45. The intent of the M-1 zoning district is to reserve appropriate locations for certain categories of light industrial uses that are relatively free of nuisance or hazardous characteristics,[4] and the intent of the M-2 zoning district is to reserve appropriate locations for a full range of industrial, manufacturing, and related establishments in order to strengthen the City's economic base and increase employment opportunities.[5] The OS zoning district identifies areas of the city that are not suited to residential or other intensive use for the reason that they may endanger the health, safety, and welfare of persons due to flooding, fire, or erosion, as well as those areas designated to allow citizens to pursue recreational activities.[6]

The proposed warehouse development is a permitted use in the existing Limited Industrial land use designation and M-1 and M-2 zoning districts.

2.3.2.2 Adjacent Properties

Table 2.3.A provides the General Plan land use and zoning designations for the Project site and adjacent properties.

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3 Only a portion of the Restoration Area is zoned Open Space/Floodway (OS).

4 City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.136: M-1 Limited Manufacturing District. Accessed July 12, 2024.

5 City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.140: M-2 General Manufacturing District. Accessed July 12, 2024.

6 City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.100: (OS) Open Space District. Accessed July 12, 2024.

Table 2.3.A: Existing General Plan, and Zoning Designations of the Project Site and Adjacent Properties

Direction from Project Site	General Plan Land Use Designation	Zoning Designation
Project Site	Limited Industrial	Limited Manufacturing (M-1)
		General Manufacturing (M-2)
	Floodway	Open Space/Floodway (OS)
Northeast	Specific Plan (Outlet Center)	Specific Plan (Outlet Center)
	Floodway	Open Space/Floodway (OS)
Southeast	Limited Industrial	Limited Manufacturing (M-1)
	Public Institutional	Public/Institutional (PI)
	Floodway	Open Space/Floodway (OS)
Northwest	Residential Mixed Use	Residential Mixed Use (RMU)
Southwest	Low-Medium Residential	Single-Family Residential (R1)
	Hillside Residential	Hillside Single-Family Residential (RH)

Source 1: City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, City of Lake Elsinore Land Use Plan, Figure 2.1A. December 13.
Source 2: City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning.

2.4 PROPOSED PROJECT

This section provides a description of the proposed Project as identified in the Project applicant's application materials submitted to the City on July 28, 2025. The proposed Project includes the construction of two warehouses totaling 1,000,451 square feet on 65.81 acres; 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area. The 140.04-acre Project site includes the following elements (refer to Figure 2-3):

- **Onsite Development Area—65.81 acres**

    - The Project would involve development of a 212,028-square-foot warehouse (Building 1) with a 5,000-square-foot ground-level office space and a 5,000-square-foot office mezzanine and a 788,423-square-foot warehouse (Building 2) with a 10,000-square-foot ground-level office space and 10,000-square-foot office mezzanine. Both buildings are proposed to be single-story with a maximum building height of 50 feet. The development also includes approximately 466 vehicle parking stalls and approximately 391 trailer parking stalls. The proposed warehouses are designed as high-cube buildings with the flexibility to accommodate up to 10 percent manufacturing and 10 percent cold-storage uses.

    - On-site access to the development would be accessible via four new driveways: three proposed along Baker Street and one proposed along Pierce Street. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed at the rear of Building 2 that would extend to the Building 1 for access to Pierce Street.

LSA

Construction/Improvements Buffer (2.72 acres)

Onsite Development Area (65.81 acres)

Restoration Area (33.65 acres)

Offsite Improvement Area (37.86 acres)

City Boundary

N

0 600 1200

FEET

FIGURE 2-3

Baker Street Warehouse Project

Project Elements

SOURCE: Nearmap (10/12/2025)

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- **Offsite Improvement Area—37.86 acres**
    - The Project would include ROW improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs. Proposed off-site improvements would include full build out of Baker Street and Pierce Street consistent with the General Plan Circulation Element, new pavement, new sidewalks, and new parkways, as well as extensions of dry and wet utility infrastructure for interconnection with the proposed warehouse buildings.

- **Restoration Area—33.65 acres**
    - The Restoration Area would be used for future conservation and restoration activities to contribute to the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Reserve. The Restoration Area is bordered by Baker Street to the south, Pierce Street and Nichols Street to the west, and Collier Avenue to the northeast. The Project Applicant placed the lands into conservation with the Regional Conservation Authority (RCA) prior to completion of the Joint Project Review (JPR).

- **Construction/Improvements Buffer—2.72 acres**
    - Land between Baker Street and the proposed Restoration Area to serve as a disturbance buffer to ensure that ROW improvements would not encroach into the Restoration Area.

2.4.1 Tentative Parcel Map No. 38812

A Tentative Parcel Map (TMP) is proposed to consolidate the 10 parcels composing the 65.81-acre Onsite Development Area (APNs 378-020-014, -015, -016, -028, -029, -030, -031, -036, -037, and -048) into two parcels. Figure 2-4 depicts the proposed TPM.

2.4.2 Building Program and Use

The proposed Project would include the construction of two warehouses totaling 1,000,451 square feet on 65.81 acres. The proposed warehouses are designed as high-cube buildings with the flexibility to accommodate up to 10 percent manufacturing and 10 percent cold storage uses.

Building 1 would be located at the northwestern end of the Onsite Development Area and include 212,028 square feet of warehouse uses, which includes approximately 5,000 square feet of office space on the ground floor, a 5,000-square-foot mezzanine, and 23 dock doors along the southwest side of the building. The office spaces would be in the northwest and southeast corners of Building 1, with the warehouse use concentrated in the center. Building 1 would be a maximum of 46 feet in height.

Building 2 would be located at the southeastern end of the Onsite Development Area and include 788,423 square feet of warehouse uses, which includes approximately 10,000 square feet of office space on the ground floor, a 10,000-square-foot mezzanine, and 110 dock doors along the northeast side of the building. The office spaces would be in the northeast and southeast corners of Building 2, with warehouse use concentrated in the center. Building 2 would be a maximum of 50 feet in height.

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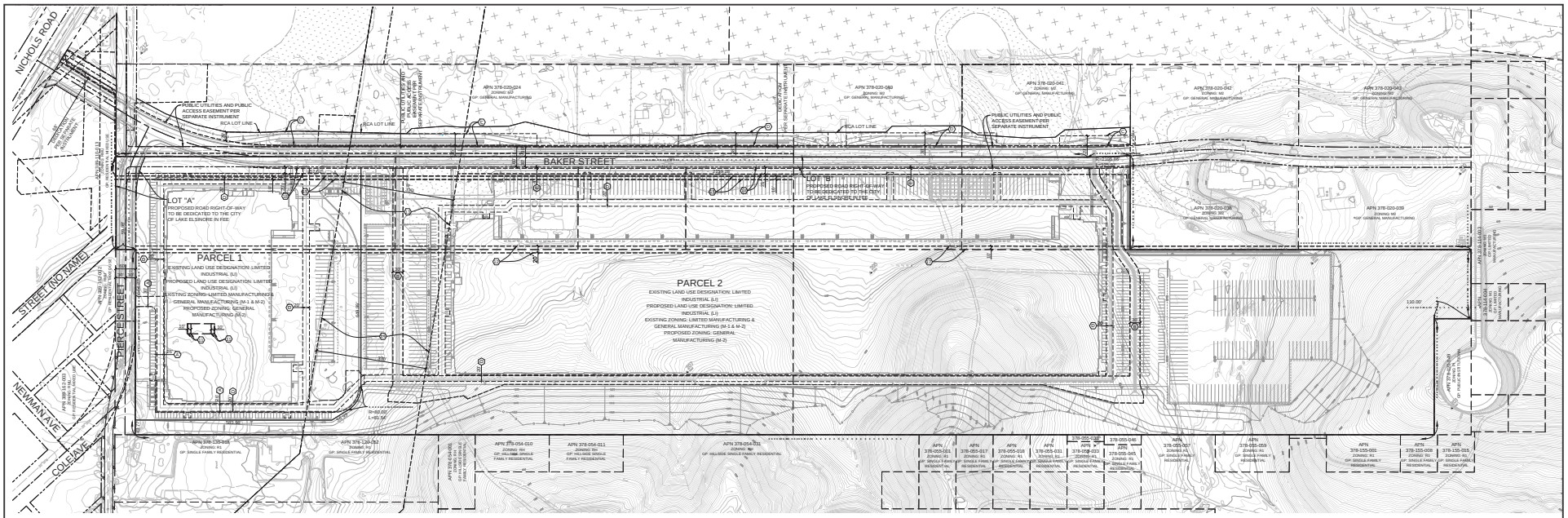
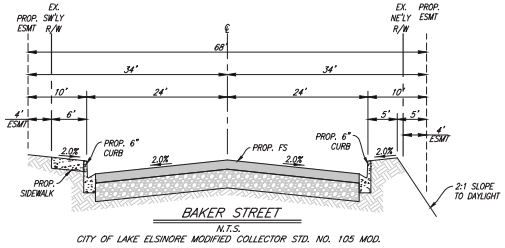
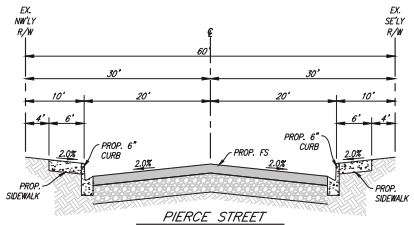


LEGEND:

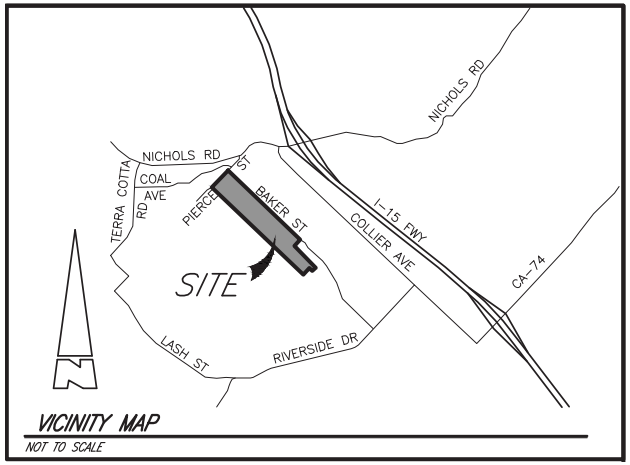
- MAP BOUNDARY
- PROP. R/W
- EX. R/W
- PROP. LOT LINE
- EX. LOT LINE
- CENTERLINE
- EASEMENT
- FLOOD ZONE "X"
- FLOOD ZONE "AE"



BAKER STREET
N.T.S.
CITY OF LAKE ELSINORE MODIFIED COLLECTOR STD. NO. 105 MOD.



PIERCE STREET
N.T.S.
CITY OF LAKE ELSINORE LOCAL STREET STD. NO. 107



VICINITY MAP
NOT TO SCALE

ASSESSOR PARCEL NO:

378-020-014, -015, -016, -028, -029, -030, -031, -036, -037, -048

LSA

FIGURE 2-4

0 200 400
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SOURCE: KWC Engineers

Baker Street Warehouse Project

Proposed Tentative Parcel Map 38812

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The proposed warehouses would be set back from the public ROW in the north and east (e.g., 94 feet from Pierce Street and at least 64 feet from Baker Street) and would also be separated from the adjacent land uses through implementation of grade variations between the Project site and adjacent land uses via landscaped buffers surrounding the proposed warehouse buildings and a concrete retaining wall up to 45 feet tall constructed of cement, shotcrete, and ground anchor/soil nail grout along the southwestern boundary of the Project site. In addition to the warehouse buildings, the proposed Project would include vehicle and truck parking as well as bike racks for bicycle parking.

The ultimate end-user has not been identified at this time; therefore, specific details about the future operation of the warehouse facility are not currently available. As such, the Project applicant has requested approval for the future warehouse to operate 24 hours per day, 7 days per week, depending on business/operational needs. Accordingly, the analysis in this EIR assumes this level of activity.

Figure 2-5 depicts the proposed site plan.

2.4.3 Landscaping

A combination of drought-tolerant plant material, including evergreen and deciduous trees, low shrubs, and masses of ground covers, would be installed throughout the Project site pursuant to the City's Municipal Code requirements. Landscaping would include accent trees, shrubs, and ground cover installed at key corners and driveway entries. Project landscaping would be designed to screen the proposed buildings, parking areas, loading dock activities, and any truck traffic passing through the Project site.

The Project would incorporate standard streetscape landscaping along Project roadways that would meet the City's landscaping requirements to provide buffering between the on-site warehouse uses and adjacent off-site uses.

Half of the landscaped areas would be equipped with a permanent, automatic, underground irrigation system conforming to City requirements and State Model Water Efficient Landscape Ordinance (MWELO; Assembly Bill [AB] 1881). The irrigation system would implement a drip design to apply water slowly, allowing plants to be deep soaked, and to reduce runoff. Half of the landscape areas would be equipped with permanent automatic high-efficiency rotors designed to prevent runoff, low head drainage, overspray, or other similar conditions where irrigation water flows onto nontargeted areas, such as adjacent properties, non-irrigated areas, hardscape, or structures in compliance with the State MWELO.

Figure 2-6 depicts the proposed landscape plan.

2.4.4 Circulation and Parking

Regional access to the Project site is provided from I-15 via Nichols Road. The proposed development area would have primary access off Pierce Street and Baker Street via Nichols Road. As depicted on Figure 2-5, the warehouse area would be accessible via four new driveways. Three driveways would be constructed along Baker Street, and one driveway would be along Pierce Street. Building 1 would be accessible via one passenger vehicle driveway along Pierce Street and one 53-foot truck access

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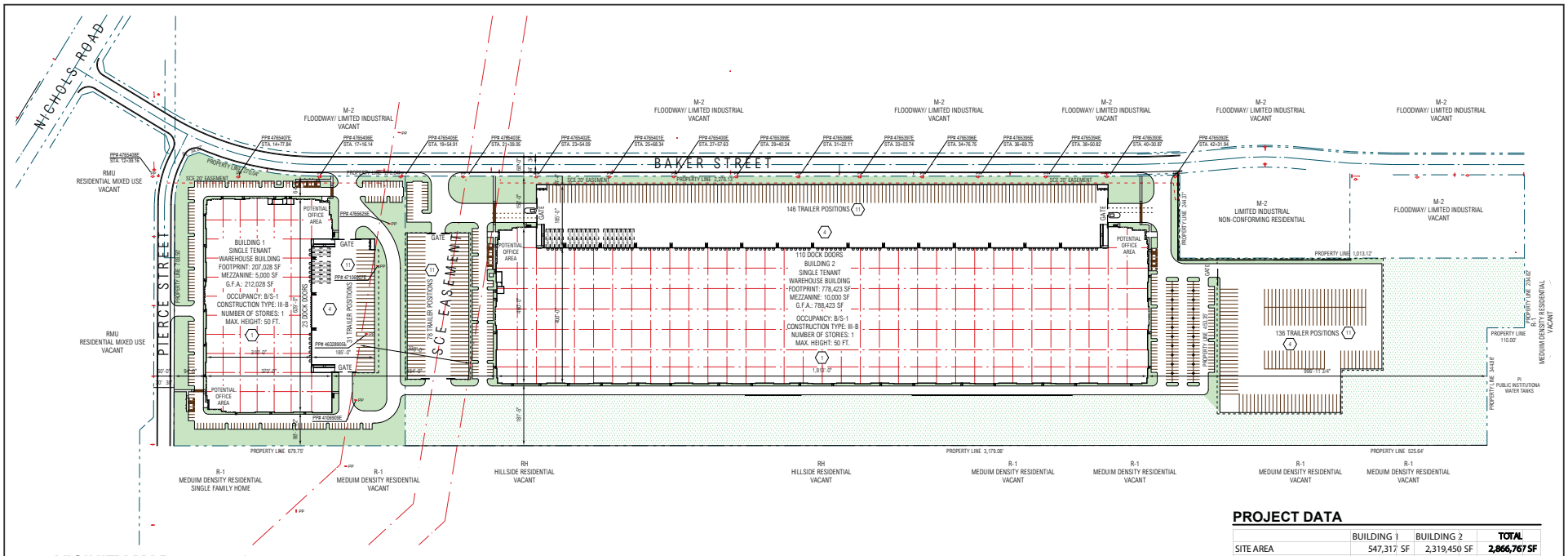

VICINITY MAP

APPLICATION TYPE

PLANNING APPLICATION NO. 2020-103
EXISTING ZONING: M-1/M-2
PROPOSED ZONING: M-2
GENERAL PLAN: LIMITED INDUSTRIAL
PERMITTED LAND USE: WAREHOUSE, OFFICE AS PERMITTED

ASSESSOR'S NUMBERS:

APN: 378-020-014, 015, 016, 028, 029, 030, 031, 036, 037, 048

SITE LEGEND:

- LANDSCAPING (SHRUBS, GRASSES, & GROUNDCOVERS)
- LANDSCAPING (NATIVE GRASSLAND MIX)
- SITE PROPERTY LINES
- CITY CURB AND GUTTER LINES
- STREET CENTERLINES
- ON-SITE CURB LINES
- ON-SITE PARKING AND TRAILER STRIPING

PROJECT DATA

	BUILDING 1	BUILDING 2	TOTAL
SITE AREA	547,317 SF	2,319,450 SF	**2,866,767 SF**
	12.565 AC	53.247 AC	**65.812 AC**
BUILDING AREA			
FOOTPRINT	207,028 SF	778,423 SF	**985,451 SF**
MEZZANINE	5,000 SF	10,000 SF	**15,000 SF**
TOTAL	212,028 SF	788,423 SF	**1,000,451 SF**
F.A.R.	38.74%	33.99%	**34.90%**
BUILDING AREA BY USE			
OFFICE	10,000 SF	20,000 SF	**30,000 SF**
WAREHOUSE	202,028 SF	768,423 SF	**970,451 SF**
AUTO PARKING			
1/1000 1ST 40K SF	40	40	**80**
1/4000 > 40K SF	43	187	**230**
TOTAL	83	227	**310**
PARKING PROVIDED			
STANDARD STALLS	111	133	**244**
ADA STALLS	7	8	**15**
EV STALLS	34	59	**93**
AUTOS IN SCE ESMT	20	94	**114**
PARKING PROVIDED EXC. SCE	152	200	**352**
TOTAL PROVIDED	172	294	**466**
DOCK LOADING ZONES			
REQUIRED	7	18	**25**
PROVIDED	31	110	**141**
TRAILER PARKING	31	360	**391**

LSA

FIGURE 2-5

0 200 400
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SOURCE: RGA Office of Architectural Design

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Baker Street Warehouse Project

Proposed Conceptual Site Plan
Onsite Development Area

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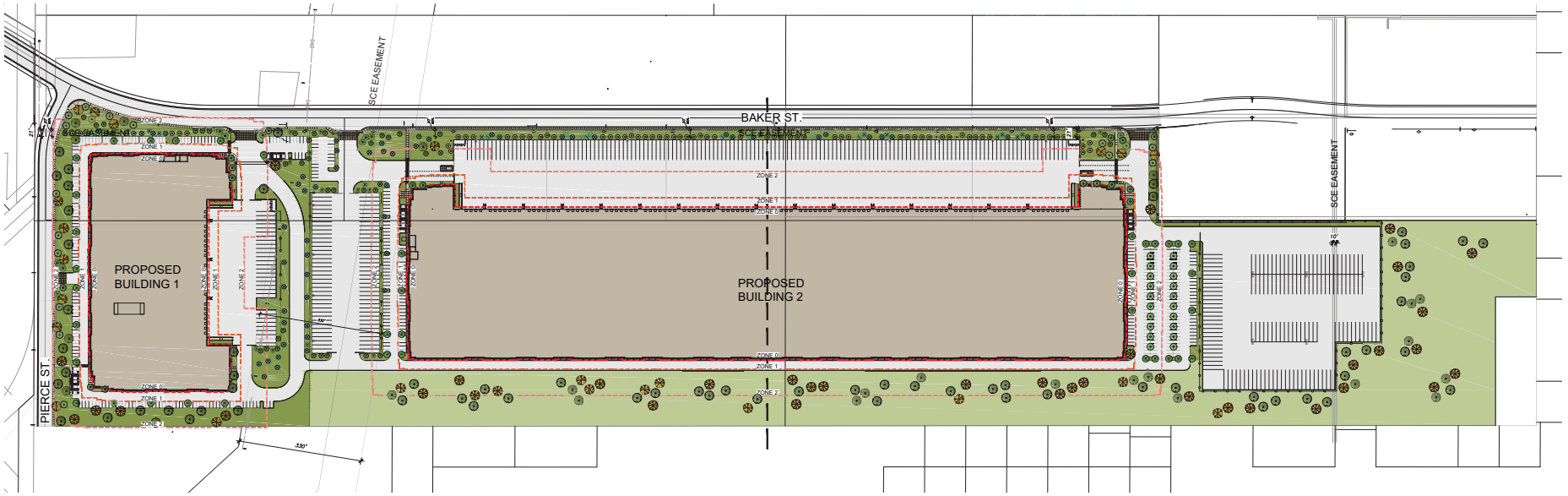

LANDSCAPE CALCULATIONS

PROJECT TYPE :	NEW AND REHABILITATED LANDSCAPE AND IRRIGATION
ZONING:	INDUSTRIAL
LAKE ELSINORE CITY GUIDELINES	
NEW LANDSCAPE AREA :	268,126 SF
REHABILITATED LANDSCAPE AREA :	618,874 SF
TOTAL LANDSCAPE AREA:	887,000 SF
PROJECT AREA	
GROSS AREA:	65.812 ACRES
BUILDING AREA	22.97 ACRES
PERCENTAGE OF TURF AREA :	0%
NUMBER OF TREES:	458
NUMBER OF PARKING LOT TREES:	191

SCE EASEMENT LAND USE GUIDELINES

Landscape and Irrigation

1. Valves/controllers of any type are not permitted within the SCE ROW. Valves that are adjacent to ROW and are of a metal material may require grounding.
2. Trees and plants within the ROW shall be maintained by the Developer/Owner and must not exceed 15-feet in height at maturity unless otherwise specified in the easement. A list of all proposed trees, shrubs and all items to be planted within the SCE ROW, including max height and growth rate, must be included on plans. In the opinion of SCE, if said trees or plants becomes an interference, they will have the right to trim and or remove at the sole cost of the Developer/Owner.
3. Trees proposed within the ROW or up to 10' outside of the ROW shall be planted with root barriers and no portion of any mature tree will be permitted under or within 10-feet of conductor drip lines and substructures. Note: Plants with mature root systems that do not exceed 24 inches in depth are exempt from this requirement.
4. No environmentally protected plant species or species which attract and support environmentally protected biological species will be allowed within the ROW.
5. Wetlands, sensitive natural habitat, vegetation related natural plant areas, or environmental mitigation within SCE's ROW are not permitted as it creates interference with SCE's ability to access its facilities & add future facilities.

SCE APPROVED PROPOSED PLANT PALETTE (PER SCE RIGHT TREE RIGHT PLACE BROCHURE)

TREES

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE / FORM	HT. X SPRD. X CAL. (MIN.)	WATER USE	DESCRIPTION
	ARBUTUS X 'MARINA'	MARINA STRAWBERRY TREE	24" BOX STD.	8'H X 5'W	M	FLOWERING TREE
	CERCIS CANDENSIS 'FOREST PANSY'	FOREST PANSY RED BUD	24" BOX STD.	8'H X 5'SP X 4"C	M	FLOWERING TREE
T	HETEROMELES ARBUTIFOLIA	TOYON	15 GAL.	1.5"-2" H X 2' SP.	L	SMALL ACCENT TREE
	JUNIPERUS CALIFORNICA	CALIFORNIA JUNIPER	15 GAL.	5'H X 3'SP	L	SMALL ACCENT TREE
	LOPHOSTEMON CONFERTUS	BRISBANE BOX	24" BOX STD.	8'H X 3'SP X 4"C	M	VERTICAL EVERGREEN
	PINUS ELDARICA	MONDELL PINE	24" BOX STD.	6'H X 3'SP.	L	EVERGREEN SCREEN
	PINUS HALEPENSUS	AFGHAN PINE	24" BOX STD.	6'H X 3'SP.	L	EVERGREEN SCREEN
	PLATANUS RACEMOSA	CALIFORNIA SYCAMORE	36" BOX	10'HT. X 4'SP.	M	DECIDUOUS CANOPY TREE
	QUERCUS AGRIFOLIA	CALIFORNIA LIVE OAK	36" BOX	14' H X 6'SP.	L	EVERGREEN CANOPY TREE
	QUERCUS DUMOSA	SCRUB OAK	24" BOX STD.	6' H X 3' SP.	L	SMALL SCREENING TREE

SCE APPROVED PROPOSED PLANT PALETTE (PER SCE RIGHT TREE RIGHT PLACE BROCHURE)

SHRUBS, GRASSES, & GROUNDCOVERS

SYMBOL	BOTANICAL NAME	COMMON NAME	SIZE	SPACING	WATER USE	DESCRIPTION
	CARISSA M. 'GREEN CARPET'	DWARF NATAL PLUM	1 GAL	30" O.C.	M	EVERGREEN LOW SHRUB
	COTYLEDON ORBICULATA	PIG'S EAR	1 GAL	18" O.C.	L	SUCCULENT ACCENT
	DIANELLA 'LITTLE REV'	LITTLE REV FLAX LILY	1 GAL	24" O.C.	L	UPRIGHT ACCENT
	HESPERALOE PARVIFOLIA	RED YUCCA	5 GAL	36" O.C.	L	UPRIGHT ACCENT
	ECHEVERIA AGAVOIDES 'LIPSTICK'	ECHEVERIA	4" POTS	8" O.C.	L	SMALL SUCCULENT
	HESPERALOE 'BRAKELIGHTS'	BRAKELIGHTS YUCCA	5 GAL	36" O.C.	L	UPRIGHT ACCENT
	RHAPHIOLEPIS INDICA 'CLARA'	INDIAN HAWTHORN	5 GAL	36" O.C.	M	EVERGREEN SHRUB
	SALVIA GREGGII	AUTUMN SAGE	5 GAL	36" O.C.	L	FLOWERING SHRUB
	WESTRINGIA 'WYNYABBIE GEM'	COAST ROSEMARY	5 GAL	36" O.C.	L	EVERGREEN HEDGE

GRASSLAND HYDROSEED MIX

	NATIVE GRASSLAND MIX					

WATER USE KEY:
VL = VERY LOW WATER USE, L = LOW WATER USE, M = MODERATE WATER USE, H = HIGH WATER USE. WATER USE STATED IS PER 'WATER USE CLASSIFICATION OF LANDSCAPE SPECIES' (ALSO REFERRED TO AS WUCOLS IV) FOR THE CITY OF LAKE ELSINORE

DEFENSIBLE ZONE LEGEND

- ZONE 0 – EMBER RESISTANT ZONE (EXTENDS 5 FEET FROM BUILDINGS AND STRUCTURES)
- ZONE 1 – LEAN, CLEAN AND GREEN ZONE (EXTENDS 30 FEET FROM BUILDINGS AND STRUCTURES)
- ZONE 2 – REDUCE FUEL ZONE (EXTENDS FROM 30 FEET TO 100 FEET OUT FROM BUILDINGS AND STRUCTURES, OR TO THE PROPERTY LINE.

VICINITY MAP

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FIGURE 2-6

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SOURCE: RGA Office of Architectural Design

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Baker Street Warehouse Project

Proposed Conceptual Landscape Plan
Onsite Development Area

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driveway along Baker Street. Building 2 would be accessible via two 50-foot driveways along Baker Street that would be used by passenger vehicles and trucks. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed behind the rear of Building 2 that would extend to Building 1 for access to Pierce Street. The reciprocal access agreement would largely be intended to provide a secondary point of emergency access for Building 2.

The proposed Project also includes 466 vehicle parking stalls located along the north, east, and west sides of Building 1 and at the southern end of Building 2, as well as approximately 389 trailer parking stalls. Twenty-nine trailer parking stalls would be located on the south side of Building 1, 78 trailer parking stalls would be on the north side of Building 2, 146 trailer parking stalls would be on the east side of Building 2, and 136 trailer parking stalls would be on the south side of Building 2. In addition, the proposed Project would include electric vehicle (EV) charging infrastructure that, at a minimum, would meet the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2. The proposed Project is designed to include 24 EV charging spaces installed and operational upon completion, with infrastructure in place to accommodate an additional 69 EV charging spaces for future use.

The proposed Project also includes 37.86 acres of off-site improvements on Baker Street and Pierce Street and includes the realignment of Baker Street to Nichols Road. The proposed Project would dedicate 4 feet of ROW on each side of Baker Street to meet the ultimate 68-foot ROW required by the City's Collector roadway designation in the General Plan Circulation Element. Baker Street would be extended to terminate at Nichols Road for a direct connection and new intersection with Nichols Road and would be improved with a 6-foot-wide sidewalk within a 10-foot parkway on the southwest side of the street, and a 6-inch curb and gutter and 24 feet of pavement from centerline to lip-of-gutter on each side of the street for approximately 0.8 mile from Nichols Road toward the southeast through the Project site. Baker Street would be elevated an average of 5 feet above its existing elevations along the proposed segment to support drainage conveyance and flood protection of public ROW, and the northeast parkway of Baker Street would slope down to discharge to the northerly properties.

The new intersection design at Baker Street and Nichols Road is expected to consist of signal pole placement consistent with the ultimate build out of Nichols Road (Urban Arterial Highway – 120-foot ROW). Nichols Road improvements would consist of an interim intersection with appropriate pavement tapering to the east and west, leading away from the new intersection with Baker Street. Minor roadway resurfacing may be required along the existing Nichols Road segment between the Baker Street intersection and the Collier Avenue intersection. The Nichols Road/Collier Avenue intersection may also include minor surface improvements, revised lane striping, and potential traffic control/signage improvements.

Pierce Street would be improved to its ultimate 60-foot full-width ROW per the City's General Plan Circulation Element standard for a Local Street with a 6-inch curb, standard gutter, 6-foot-wide sidewalk within an overall 10-foot parkway, and 20 feet of pavement from centerline to lip-of-gutter on each side of the street from Nichols Road southwest past the Project frontage to connect to Hoff Avenue, creating a second means of emergency access. The section of Pierce Street from the Project frontage to Hoff Road would be paved within the existing ROW, creating a 24-foot-wide roadway

along this segment. All street improvements would be constructed consistent with City standards and regulations.

The 2.72-acre Construction/Improvements Buffer would be located within the Project area between the Baker Street ROW improvements and the Restoration Area. The Construction Buffer is included as part of the Project to ensure that any disturbance adjacent to the ROW improvements would not encroach onto the Restoration Area. This Construction Buffer would be a separate parcel from the Restoration Area.

2.4.5 Restoration Area

As shown on Figure 2-3, opposite of the Onsite Development Area and Construction/Improvements Buffer, on the north side of Baker Street, 33.65 acres of the Project site would be designated for future conservation efforts dedicated to habitat restoration. The Restoration Area is established to contribute to the MSHCP Reserve and is bordered by Baker Street to the south, Pierce Street and Nichols Street to the west, and Collier Avenue to the northeast. The Project Applicant placed the lands into conservation with the RCA prior to completion of the JPR. Several types of mitigation are proposed within with the Restoration Area, including San Diego ambrosia (*Ambrosia pumila*) translocation, vernal pool expansion/restoration, and mitigation for other MSHCP plants, including Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*). If the long-term management of these mitigation areas exceeds that which the RCA receives funding for through the MSHCP, the Project Applicant would provide an endowment to fund supplemental management requirements.

2.4.6 Utilities

The Project site is located in an urbanized area that is currently served by existing utilities, including water, sanitary sewer, storm drainage, electricity, natural gas, and telecommunications infrastructure. Existing and proposed utility improvements and connections are discussed below. Figure 2-7 depicts the proposed utility plan for water, sanitary sewer, and storm drainage infrastructure.

2.4.6.1 Water

Potable water service to the Project site would be provided by the EVMWD. The proposed Project would include the installation of a new EVMWD-operated 36-inch water transmission line in the Nichols Road and Baker Street ROWs. The proposed transmission line would begin at the intersection of Nichols Road and Terra Cotta Road and would connect to the existing 20-inch water line in Baker Street that supplies the Baker Reservoir. The proposed Project would connect to the proposed transmission line in Baker Street at two locations. One point of connection is proposed for Building 1 at the southeast corner of the building, and the second point of connection is proposed for Building 2 at the southeast corner of the building (refer to Figure 2-7). The proposed Project would also include 12-inch water lines that would loop around the proposed buildings to provide potable water and supply proposed fire hydrants. At the request of EVMWD, the proposed Project would also include the installation of a new EVMWD-operated 12-inch water line parallel to the proposed transmission line between the two proposed connection points.

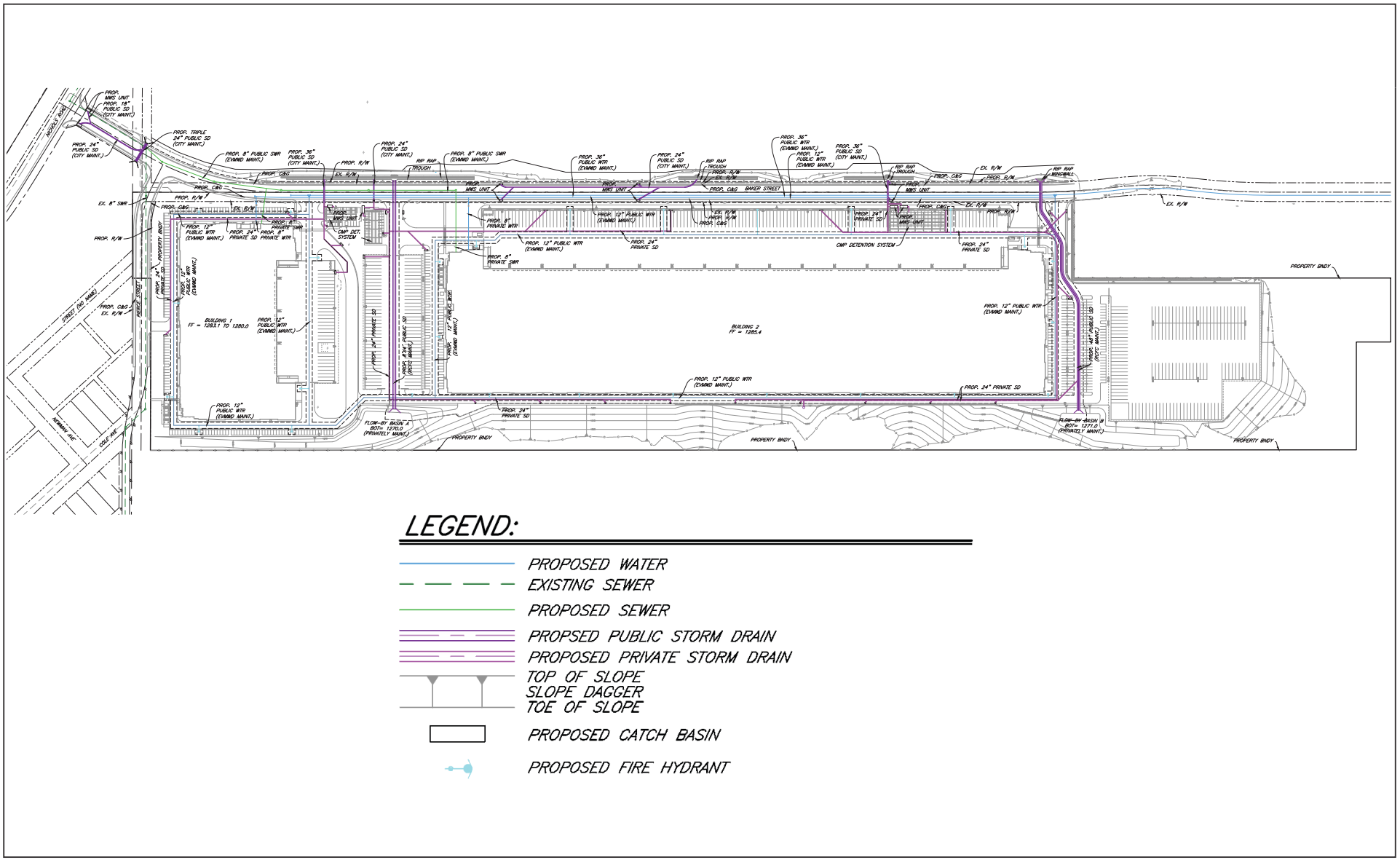

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FIGURE 2-7

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SOURCE: KWC Engineers

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Baker Street Warehouse Project

Proposed Conceptual Wet Utility Plan
Onsite Development Area

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2.4.6.2 Wastewater

Sanitary sewer service at the Project site is also provided by the EVMWD. The proposed Project would include the installation of a new EVMWD-operated 8-inch sewer line in the Baker Street ROW from Pierce Street to the west entrance of Building 2. The proposed sewer line would connect to the existing 15-inch sewer line at the intersection of Baker Street and Pierce Street, where it would convey wastewater to the existing Nichols Lift Station. The proposed Project would connect to the proposed sewer line in Baker Street at two locations. One point of connection is proposed for Building 1, on the east side of the building, and the second point of connection is proposed for Building 2, at the northeast corner of the building.

The existing Nichols Lift Station, located at the intersection of Nichols Road and Pierce Street, has been planned for expansion along with build out of the Project vicinity. The timing of the expansion is based on development of areas outside of the Project site. Should development of the Project occur prior to build out of the Nichols Lift Station and additional capacity be required, the Nichols Lift Station would be upgraded to accommodate the Project's flows. The lift station would be improved within the existing footprint of the current lift station and within the existing public ROW. Improvements would include the installation of three pumps, each rated for 1,100 gallons per minute (gpm) and the construction of an associated above-grade control structure. Additionally, 7,650 feet of 16-inch force main would be installed in Nichols Road and Collier Avenue to connect to a discharge manhole at the intersection of Collier Avenue and Riverside Drive.

2.4.6.3 Stormwater

As previously discussed, the majority of the Project site consists of undeveloped land, with some public road ROWs. The existing impervious surface area on the Project site consists of segments of Nichols Road, Pierce Street, and Baker Street. The remaining portion of the Project site consists of pervious surface. There is no existing stormwater infrastructure on the Project site. Due to the topography of the Project site, surface flows on the Project site likely sheet flow toward the center of the Project site under existing conditions.

The proposed Project includes the installation of two modular wetlands between the two proposed warehouse buildings and two modular wetlands near the southern end of Building 2. Two corrugated metal pipe (CMP) detention systems would also be located between the two proposed buildings to collect and store stormwater runoff before treating and discharging the runoff at a controlled rate that is equal to or below the pre-development discharge rate per National Pollutant Discharge Elimination System (NPDES) requirements.

Proposed on-site stormwater conveyance infrastructure would include 24-inch storm drain lines that would collect stormwater and convey runoff to the CMP detention systems and modular wetlands before discharging to the Restoration Area northeast of Baker Street. The proposed Project would also include the installation of two 48-inch storm drain lines to convey off-site stormwater runoff from properties southwest of the Project site across the Project site before discharging to the Restoration Area northeast of Baker Street. Rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

Along the northern edge of Baker Street, a graded and landscaped slope would daylight to existing ground within the parcels north of the existing Baker Street ROW. The proposed slope would provide areas to construct storm drain outlets that will convey historical storm flows to existing flow lines and ultimately into the Restoration Area in the northern portion of the Project site. The storm outlets would include energy dissipation improvements to control the stormwater outlet depth and velocity to mimic existing conditions.

2.4.6.4 Electricity

Electricity at the Project site would be provided by SCE. The proposed Project would include connections to the existing electricity infrastructure at the nearby Fogarty Substation via a distribution circuit extension along Terra Cotta Road to Nichols Road to Pierce Street, where it would interconnect to the Project facilities within the Onsite Development Area. The Project would include two 300-horsepower diesel-powered emergency generators at the proposed warehouses on the Onsite Development Area and one 350-horsepower diesel-powered emergency generator at the off-site lift station.

2.4.7 Development Agreement

The project includes a Development Agreement to formalize the various fees and other contributions the Project applicant would make to the City if the Project were approved, as well as to identify off-site circulation and utility improvements to be constructed for the Project.

2.4.8 Construction

The anticipated construction schedule assumes that construction of the proposed Project would begin April 2026 and be completed by August 2027, a period of approximately 17 months. The proposed Project would require demolition/site preparation, grading, building construction, architectural coating, and paving. Demolition activities include demolition of approximately 2,336 square feet of paved areas. Grading of the Project site would require approximately 50,000 cubic yards of cut (soil export). Excavation depths for rough grading, compaction for building foundations, and utility trenching would reach between 0 feet and 100 feet below the existing grades on the Project site.

Building construction is expected to entail the longest duration of the construction schedule and occur for approximately 290 days; paving and architectural coating would occur during the building construction phase. Construction equipment parking and materials staging would occur on the Project site, including the Onsite Development Area and Offsite Improvement Area. However, it is possible there would be temporary lane closures and/or detours necessary along roadways during various periods of Project construction.

2.4.9 Project Objectives

The *CEQA Guidelines* require that an EIR include "a statement of objectives sought by the proposed project." The following objectives are identified for the proposed Project relative to the planning and CEQA processes:

1. Embrace flexible and diverse industrial land uses that foster economic development opportunities for the City of Lake Elsinore and surrounding areas near I-15.

2. Provide local, well-paying jobs to residents who may otherwise travel out of the region for employment.

3. Provide new economic development that is consistent with the City's General Plan.

4. Facilitate the construction of utilities, roads, and other major infrastructure that are sufficiently sized to adequately serve the Project site and vicinity, as planned by the City's General Plan.

5. Enhance streetscapes and provide buffers between the planned land uses.

6. Provide for the conservation and restoration of over 33 acres of land.

7. Incorporate "green" and sustainable practices, as practicable, in developing buildings and infrastructure.

8. Maximize the use of native plant materials/species in the Project landscaping, especially in areas located in proximity to preserved native habitat.

2.5 DISCRETIONARY ACTIONS, PERMITS, AND OTHER APPROVALS

In accordance with Sections 15050 and 15367 of the *State CEQA Guidelines*, the City is the designated Lead Agency for the proposed Project and has principal authority and jurisdiction for CEQA actions and Project approval. Responsible Agencies are those agencies that have jurisdiction or authority over one or more aspects associated with the development of a proposed project and/or mitigation. Trustee Agencies are State agencies that have jurisdiction by law over natural resources affected by a proposed project.

The discretionary actions to be considered by the City as part of the proposed Project include:

- **Zone Change No. 2023-04:** To amend the zoning of the Limited Manufacturing (M-1) portion of the Onsite Development Area to General Manufacturing (M-2) for consistent zoning of the site. Refer to Figure 2-8.

- **Tentative Parcel Map No. 38812:** To merge the 10 existing parcels of the Onsite Development Area into 2 parcels.

- **Industrial Design Review No. 2023-03**: For the proposed site plan as a 1,000,451-square-foot warehouse distribution development with employee/visitor and trailer parking.

- **Conditional Use Permit No. 2023-10**: For M-2 uses within 300 feet of a residential district.

- **Conditional Use Permit No. 2025-01**: To exceed the 45-foot maximum building height in the M-2 zone.

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Current Zoning

Proposed Zoning

LSA

City Boundary
Onsite Development Area

Zoning Designation

C2 - General Commercial
CM - Commercial Manufacturing
F - Floodway
M1 - Limited Manufacturing
M2 - General Manufacturing
PI - Public Institution
PI - Public/Institutional
R1 - Single Family Residential
RE - Residential Estate
RH - Hillside Single Family Residential
RMU - Residential Mixed Use
SP - Specific Plan

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FIGURE 2-8

Baker Street Industrial Project

Proposed Zone Change

SOURCE: Nearmap (10/12/2025); City of Lake Elsinore (2020)

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- **Development Agreement No. 2025-12**: To specify fee and other contributions to the City and the provision of various off-site roadway and utility improvements.

- **Certification of the Project EIR:** The City will consider certification of the EIR prior to taking action on the requested approvals. In conjunction with certification of the EIR and approval of the proposed Project, the City will consider adopting a Mitigation Monitoring and Reporting Program (MMRP), which would ensure implementation of the measures and conditions of project approval to mitigate or avoid potentially significant effects on the environment.

- **Adoption of Statement of Overriding Considerations:** Pursuant to *CEQA Guidelines* Section 15093, the Lake Elsinore City Council must balance the benefits of the proposed Project against any significant and unavoidable environmental impacts in determining whether to approve the Project. If the benefits of the Project outweigh the unavoidable adverse environmental impacts, those impacts would be considered "acceptable."

- **Any Other Discretionary Approvals:** Additional discretionary actions may include, but not be limited to: final maps, grading permits, and water and sewer system approvals.

2.5.1 Other Agencies (as Required)

CEQA Guidelines Section 15124(d)(1) further requires the City, to the extent the information is known, to include a list of the agencies expected to use the EIR in their decision-making processes, a list of permits and other approvals required to implement the Project, and a list of related environmental review/consultation requirements established by federal, State, or local law, regulation and/or policy. Following certification of the EIR and adoption of the discretionary actions listed above, additional actions and approvals will be required by the City and other agencies. Key approvals include:

- **Review and Approval of All On-Site and Off-Site Grading and Infrastructure Plans:** These include street and utility improvements pursuant to the proposed Project conditions of approval.

- **Approval of a Water Quality Management Plan (WQMP):** This is to mitigate post-construction runoff flows pursuant to the proposed Project conditions of approval.

- **Building Permits:** Building permits will be required pursuant to the proposed Project conditions of approval and may include, but would not be limited to: lighting, landscape, roadway improvement, mechanical, electrical, plumbing, building, and other plans.

- **Any Other Nondiscretionary Actions:** Consistent with the conditions of approval to implement the proposed Project.

- **Other Actions and Approvals:** Other City, regional, and State departments/agencies also may use the EIR in conjunction with other required permits and approvals, including (but not limited to) the following:

    - State Water Resources Control Board
    - South Coast Air Quality Management District

- California Air Resources Board
- California Department of Fish and Wildlife
- United States Fish and Wildlife Service
- Western Riverside County Regional Conservation Authority
- California Department of Transportation
- Lake Elsinore Water and Wastewater Utilities Department
- Riverside County Flood Control and Water Conservation District
- California Department of Forestry and Fire Protection
- Regional Water Quality Control Board

3.0 ENVIRONMENTAL ANALYSIS, IMPACTS, AND MITIGATION MEASURES

This chapter contains an analysis of each potentially significant environmental issue that has been identified for the proposed Baker Street Warehouse Project (proposed Project). This introduction to the chapter: (1) identifies how a determination of significance is made; (2) identifies the environmental issues addressed in this chapter; (3) describes the context for the evaluation of cumulative effects; (4) lists the format of the topical issue section; and (5) provides an evaluation of each potentially significant issue in Sections 3.1 through 3.20.

DETERMINATION OF SIGNIFICANCE

Under the California Environmental Quality Act (CEQA), a significant effect on the environment is defined as a substantial, or potentially substantial, adverse change in the environment.[1] The *CEQA Guidelines* direct that this determination be based on scientific and factual data.[2] Each impact evaluation in this chapter is based on criteria of significance, which are the thresholds for determining whether an impact is significant. These criteria of significance are the criteria set forth in Appendix G of the *CEQA Guidelines,* thresholds specifically adopted by the City of Lake Elsinore (City) as described in *CEQA Guidelines* Section 15064.7, or resource agencies, as applicable. In determining whether a project's impacts are significant, an Environmental Impact Report (EIR) compares those impacts with existing environmental conditions, which are referred to as the "baseline" for the impact analysis. This EIR compares the project impacts with environmental conditions in existence at the time the Notice of Preparation (NOP) for this EIR was published (July 2024), except as otherwise noted.

ISSUES ADDRESSED IN THE DRAFT EIR

Sections 3.1 through 3.20 of this chapter describe the environmental setting of the project as evaluated in the EIR and the impacts that are expected to result from implementation of the Project. Mitigation measures are proposed to reduce potential impacts where appropriate. The following environmental issues are addressed in this chapter:

3.1 Aesthetics
3.2 Agriculture and Forestry Resources
3.3 Air Quality
3.4 Biological Resources
3.5 Cultural Resources
3.6 Energy
3.7 Geology and Soils
3.8 Greenhouse Gas Emissions
3.9 Hazards and Hazardous Materials
3.10 Hydrology and Water Quality
3.11 Land Use and Planning
3.12 Mineral Resources
3.13 Noise
3.14 Population and Housing
3.15 Public Services
3.16 Recreation
3.17 Transportation
3.18 Tribal Cultural Resources
3.19 Utilities and Service Systems
3.20 Wildfire

[1] *CEQA Guidelines,* Section 21068. (California Code of Regulations [CCR] Title 14, Chapter 3, Sections 15000–15397.)
[2] *CEQA Guidelines,* Section 15064(b)(1).

CUMULATIVE ANALYSIS

CEQA defines cumulative effects as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[3] The assessment of cumulative impacts contained in EIRs is typically based on either: (1) past, present, and probable future projects, which are either approved or being considered for approval by the City or other municipalities (or anticipated to be submitted for consideration, including projects in the design phase or under construction); or (2) growth projections set forth in regional plans, including regional modeling plans.

Incremental increases in employment and demand for infrastructure and utilities are anticipated to occur as the result of the proposed project, as well as growth in population, housing, and employment from development of other projects in Lake Elsinore and the surrounding region. An EIR must include a discussion of the potential cumulative impacts of a proposed project when that project's individual impact has the potential to be cumulatively considerable.[4] A cumulative impact from several projects is an adverse change in the environment that results from the incremental impact of the proposed project when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future projects.

Criteria for evaluating the significance of adverse effects are identified for each environmental issue topic in Sections 3.1 through 3.20 of this chapter. These criteria, which are based on resource sensitivity, quality, and quantity, are also instructive when evaluating whether the environmental effect resulting from implementation of a particular project is cumulatively considerable. The timing and duration of each activity is also an important consideration for evaluating the potential cumulative effects of activities that may occur only for a limited period. In such cases, a cumulative effect may occur only when two or more of the activities are occurring simultaneously.

Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a specific period of time within a specific physical domain. These temporal and spatial parameters are specific to each environmental issue topic and are defined accordingly in Sections 3.1 through 3.20 of this chapter; they may range from the immediate vicinity of the Project site to the city of Lake Elsinore, Riverside County, or the entire Southern California Association of Governments (SCAG) region when necessary. For example, the cumulative universe for air quality impacts is expected to be the entire South Coast Air Basin, which is much larger than the cumulative universe for public services impacts (i.e., the service area of the various service providers) or the cumulative universe for noise, which is confined to the Project site and immediately adjacent areas.

With respect to the analysis of cumulative impacts, CEQA generally requires the following:

a. Cumulative impacts shall be discussed when the project's incremental effect is cumulatively considerable.
b. The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided of the effects

[3] *CEQA Guidelines*. Section 15355.
[4] *CEQA Guidelines*. Section 15130(a)(1).

attributable to the Project. The discussion should be guided by the standards of practicality and reasonableness.

Past, present, and reasonably foreseeable or probable future projects determined to be cumulatively considerable to the proposed Project were established through consultation with the City Planning Department via the transportation scoping process.[5] The traffic impact study scope of work and cumulative projects list were approved for the proposed project on April 24, 2024.[6] Table 3.A summarizes data provided by the City Planning Department of the potential development projects that, when considered together with the proposed Project, could result in cumulatively considerable impacts to the environment.[7] The locations of these various cumulative projects are shown on Figure 3-1, Cumulative Projects. The significance of a cumulative impact may be greater than the effects resulting from the individual actions if the effects of more than one action are additive. Thus, as set forth above, this chapter evaluates the proposed project together with (1) the reasonably foreseeable potential effects of other closely related past, present, and reasonably foreseeable or probable future development in the project area, and (2) growth projections set forth in regional plans.

Table 3.A: Cumulative Project List

Cumulative Project	Location	Description
1. Terracina – Single Family Residential	South of the junction of Hoff Avenue and Pierce Street	448 single-family dwelling units and 51 multifamily dwelling units
2. Kassab Travel Center – Gas Station and Convenience Store, Restaurant with Drive-Through	Northwest corner of SR-74 and Collier Avenue	18 vehicle fueling positions and 3,000 sf of fast-food restaurant with drive-through
3. Nicholas Ranch – Commercial	Southeast corner of I-15 and Nichols Road	852,000 sf of commercial retail uses
4. The Lakeview Plaza – Commercial Retail Center	Northwest corner of Lakeshore Drive and Manning Street	36,100 sf of shopping center uses and 7,000 sf of high turnover sit-down restaurant
5. Xebec Building Company – Industrial	Northwest corner of Pasadena Street and Central Avenue	100,000 sf of industrial uses
6. North Elsinore Business Park – Industrial	Northwest of the intersection of Collier Avenue and Riverside Drive	93,255 sf of industrial uses
7. Lakeshore Drive Condominiums	Southwest of the intersection of Lakeshore Drive and Gunnerson Street	140 single-family attached dwelling units
8. Starbucks Coffee Shop with Drive Through	Southwest corner of SR-74 and Central Avenue	4,000 sf of commercial retail uses

Source: EPD Solutions, Inc., Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore (December 22, 2023, revised March 22, 2024).
I- = Interstate SR- = State Route
sf = square feet

Cumulative projects in Lake Elsinore and in the vicinity of the Project site are identified in Table 3.A: Cumulative Project List.

5 EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.
6 Ibid.
7 Ibid.

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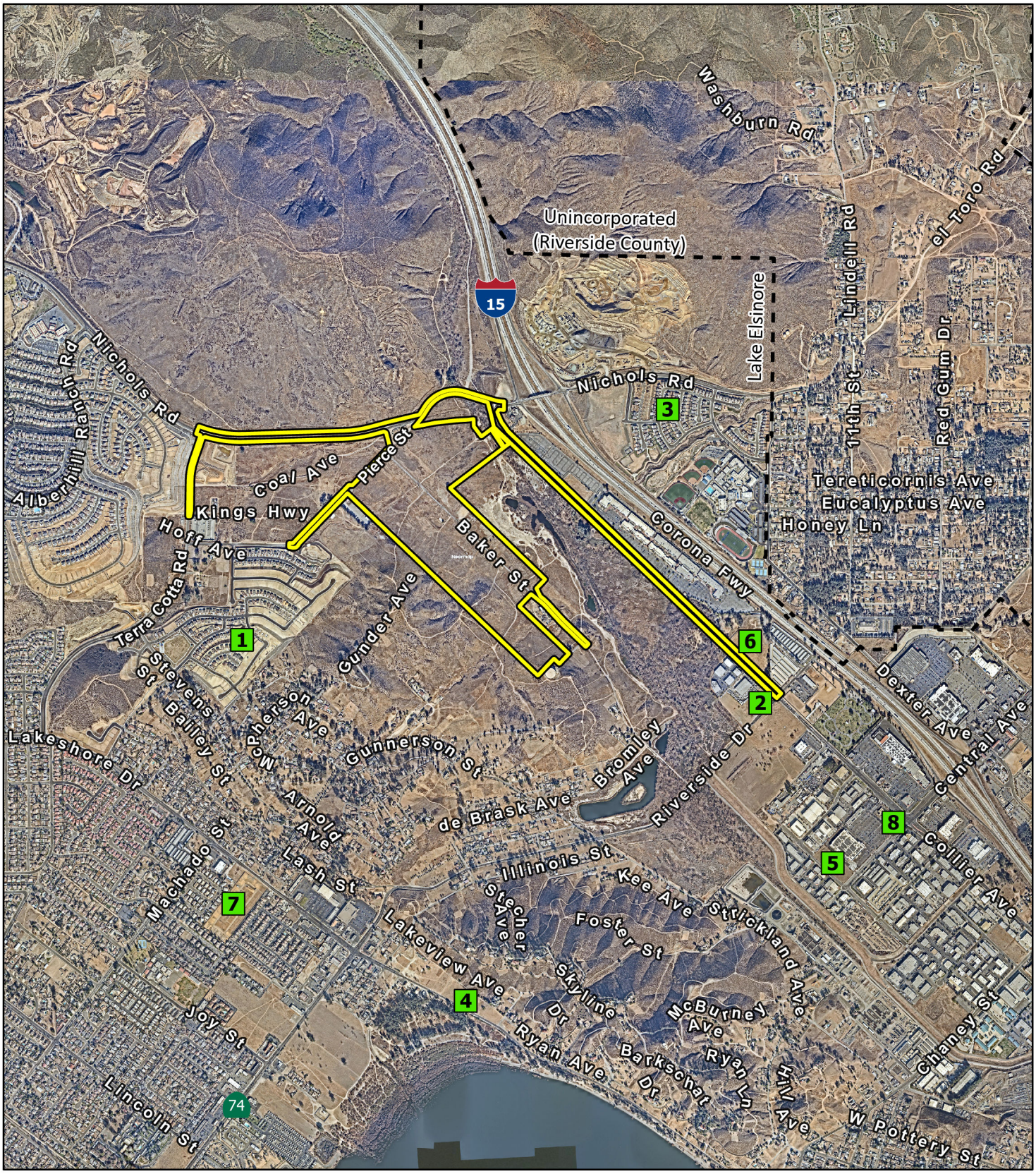

LSA

Project Site

Cumulative Projects

City Boundary

FIGURE 3-1

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SOURCE: Nearmap (10/12/2025)

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Baker Street Warehouse Project

Cumulative Projects

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Implementation of the mitigation measures identified in each specific section of this EIR would reduce the cumulative impact of the Project to the extent feasible. In many cases, the mitigation measures result in reducing the Project's cumulative impact to a less than significant level. For other impacts, the implementation of the identified mitigation measures would not avoid a significant cumulative impact. Where applicable, the 20 sections of Chapter 3.0 (i.e., Sections 3.1 through 3.20) identify those significant, unavoidable cumulative impacts that would not be reduced to a less than significant level through implementation of the identified mitigation measures presented in each of those sections. In addition, the analyses indicate to what degree the proposed Project makes a significant contribution to cumulatively considerable impacts for each environmental issue (i.e., air quality and greenhouse gas emissions).

FORMAT OF RESOURCE SECTIONS

This chapter contains 20 sections. Each section addresses one environmental resource topic listed in Appendix G of the *CEQA Guidelines.*

For each environmental impact issue analyzed, the EIR includes a description of the existing conditions, thresholds of significance that will be applied to determine whether the Project's impacts are significant or less than significant, analysis of the environmental impacts, and a determination of whether the Project would have a significant impact if implemented. A "significant impact" or "significant effect" means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the Project, including land, air, water, minerals, flora, fauna, ambient noise, and object of aesthetic significance. An economic or social change by itself shall not be considered to be a significant effect on the environment."[8] A discussion of the cumulative effects of the Project, when considered in combination with other projects causing related impacts, for each environmental resource topic is included in each respective section of this chapter as required by *CEQA Guidelines* Section 15130.

Each of the environmental topic sections is organized into the following subsections:

- **Introduction** briefly describes the topics and issues covered in the section.
- **Scoping** summarizes the public comments received during the public scoping meeting held on August 1, 2024, for the proposed Project, as well as any correspondence received by City staff in response to the NOP that was distributed for public review between July 19 and August 19, 2024, for the topic under investigation.
- **Methodology** describes the approach and methods employed to analyze the environmental impacts, if any, for the topic under investigation.
- **Existing Environmental Setting** describes the relevant physical conditions that exist at the time of the issuance of the NOP, unless otherwise noted, that may influence or affect the topic under

[8] *CEQA Guidelines.* Section 15382.

investigation. This section focuses on physical project site characteristics that are relevant to the environmental topic being analyzed.

- **Regulatory Setting** lists and discusses the laws, ordinances, regulations, plans, and policies that relate to the specific environmental topic and how they apply to the Project.

- **Thresholds of Significance** sets forth the thresholds against which the impacts of the Project are measured and that are the basis of the conclusions regarding significance.

- **Project Impact Analysis** describes the potential environmental changes to the existing physical conditions that may occur if the Project and the associated project design features relevant to impacts are implemented. Evidence is presented to show the cause-and-effect relationship between the Project and potential changes in the environment. In accordance with *CEQA Guidelines* Section 15126.2(a), this EIR is required to "identify and focus on the significant environmental effects" of the Project. The magnitude, duration, extent, frequency, and range or other parameters of a potential impact are ascertained to the extent feasible to determine whether impacts may be significant. In accordance with CEQA, potential project impacts, if any, are classified as follows for each of the environmental topics discussed in this EIR.

    - **Significant and Unavoidable Impact:** If the Project is approved with significant and unavoidable impacts, the decision-making body is required to adopt a statement of overriding considerations pursuant to Public Resources Code Section 21081 and CEQA Guidelines Section 15093 explaining why the Project benefits outweigh the unavoidable adverse environmental effects caused by those significant and unavoidable environmental impacts.

    - **Less Than Significant with Mitigation Incorporated:** This classification refers to potentially significant environmental impacts that can be feasibly mitigated to less than significant levels. If the Project is approved, the decision-making body is required to make findings pursuant to CEQA Guidelines Section 15091 that mitigation measures have been prescribed or incorporated into the Project that avoid or substantially lessen significant environmental effects.

    - **Less Than Significant Impact:** Less than significant impacts are environmental impacts that have been identified but do not rise to levels of significance. Mitigation is not required for less than significant impacts.

    - **No Impact:** A "no impact" determination is made when the Project is found to have no environmental impact.

- **Level of Significance Prior to Mitigation** summarizes the potentially significant impacts of the Project, if any, prior to mitigation.

- **Regulatory Compliance Measures and Mitigation Measures** describes relevant and applicable laws or regulations that must be adhered to with respect to construction and/or operation of the Project and that would reduce or lessen potential impacts related to a particular issue area. This

subsection also identifies Project-specific measures that avoid, minimize, rectify, reduce, eliminate, or compensate for a potentially significant impact.

- **Level of Significance After Mitigation** describes the significance of potential impacts after implementation of mitigation measures. Potential significant unavoidable impacts, if any, are clearly stated in this section.

- **Cumulative Impacts** focuses on the potential environmental effect of the proposed Project combined with the effects of reasonably foreseeable cumulative projects within the Project study area.

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3.1 AESTHETICS

This section of the Draft Environmental Impact Report (EIR) discusses the existing aesthetic condition of the Baker Street Warehouse Project (Project) site and provides an analysis of the potential impacts anticipated with implementation of the proposed Project related to aesthetics resources. This section also addresses potential impacts related to changes to scenic vistas and highways, changes in aesthetic conditions, effects to existing visual resources and public views, and impacts related to lighting and glare. This section summarizes information provided in the *Baker Street Warehouse Project Visual Impact Assessment* (VIA; EPD Solutions, Inc., February 2025).[1] This report is included as Appendix B to this Draft EIR.

3.1.1 Scoping Process

Potential impacts to aesthetic resources were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City of Lake Elsinore (City) received three comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to aesthetic resources. NOP comments related to aesthetic resources included comments from the following:

- **Dan Silver, Endangered Habitats League (July 15, 2024):** This commenter stated, "The project is proposed for natural habitat west of I-15, a site also of viewshed importance."

- **Jefrey Ong (August 10, 2024):** This commenter expressed concerns about how the scale and industrial nature of warehouses similar to the proposed Project could alter the character of the community of Alberhill, which is known for its residential nature and peaceful environment.

- **Kim Freeburn, California Department of Fish and Wildlife (CDFW) (August 14, 2024):** CDFW requested that the Draft EIR include a discussion of potential lighting impacts on natural areas and wildlife and suggested that a lighting plan be developed for the proposed Project to demonstrate that project lighting would not significantly increase lighting on Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) conservation areas. A thorough evaluation of potential impacts relative to MSHCP conservation areas is provided in Section 3.4 of this Draft EIR.

For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.1.2 Methodology

To assess the impacts of the proposed Project with respect to aesthetic resources, EPD Solutions, Inc., conducted a VIA, which included a discussion of the City of Lake Elsinore General Plan, Chapter 4 (Resource Protection and Preservation); identification of the methodology and standards used in the VIA; and an evaluation of the pre- and post-development aesthetic and scenic condition of the Project site and surrounding areas.

[1] EPD Solutions, Inc. 2025. *Baker Street Warehouse Project Visual Impact Assessment.* February.

3.1.1.1 Key Concepts

The assessment of aesthetic impacts is subjective by nature and is guided by the consensus of the community in which a scenic resource is located and/or the general viewing public. Generally, high-quality views have topographic relief, a variety of vegetation, rich colors, impressive scenery, and unique natural and/or built features. Moderate-quality views have interesting but minor landforms, some variety in vegetation and color, and/or moderate scenery. Low-quality views have uninteresting features, little variety in vegetation and color, uninteresting scenery, and/or common elements. Viewer types in the Project area are broad and may include motorists, pedestrians, and neighboring uses. Public viewers are generally limited to motorists and limited pedestrian traffic along public roadways in the Project vicinity. Due to distance between the Outlets at Lake Elsinore and residential areas, pedestrian activity would generally be limited to persons moving between their vehicles to commercial uses. An assessment of a project's aesthetic impacts generally utilizes the following concepts.

Aesthetic Resources. These resources are the combined natural or manmade elements, such as landforms, vegetation, water features, urban design, and/or architecture, that provide an overall visual impression that is pleasing to, or valued by, its observers. Factors important in describing the aesthetic resources of an area include visual character, scenic resources, and scenic vistas. These factors together not only describe the intrinsic aesthetic appeal of an area but also communicate the value placed upon a landscape or scene by its observers.

Scenic Resources. Components of the landscape, including visually significant hillsides, ridges, water bodies, vegetation, and buildings, are critical in shaping the visual character and scenic identity of a site and its surrounding area. A development could impact a scenic resource directly through physical changes (e.g., removal, disturbance, or development on a ridgeline, hillside, peak, or shoreline) and/or through limiting access to the scenic resource to the viewing public. The degree to which these resources are present or significant is based on the values of the community and the viewing public.

The City's General Plan EIR identifies scenic resources as, "…the lake, portions of the Cleveland National Forest, rugged hillside land, distant mountains and ridgelines, rocky outcroppings, streams, vacant land with native vegetation, parkland, and buildings of historical and cultural significance such as the cultural center, bathhouse, and military academy."[2]

Scenic Vista. A scenic vista typically consists of panoramic views of important visual features, as seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A development project can affect a scenic vista by either blocking or partially obstructing publicly available views of the vista, or by blocking access to said vistas.

Viewsheds or landscape viewshed units of scenic vistas within the City's planning area include Lake Elsinore, urban areas surrounding the lake, and the rugged undeveloped hills in the northern and eastern portion of the city.[3] Per the City's General Plan Environmental Impact Report (GP EIR), the

[2] City of Lake Elsinore. 2011. General Plan Environmental Impact Report, Section 3.3. December.
[3] Ibid.

Project site is located in Landscape Viewshed 13, defined as, "Mainly manufacturing land use located along I-15. Relatively flat topography."[4,5]

Scenic Corridors. Scenic corridors are public features that facilitate movement (primarily by automobile, transit, bicycle, or foot) from one location to another and provide expansive views of natural landscapes and/or visually attractive manmade development. Scenic corridors analyzed under the California Environmental Quality Act (CEQA) typically include State-designated scenic highways and locally designated scenic routes.

Visual Character. The visual character of an area is defined by the combination of natural and/or manmade features that create an overall impression of an area. In this context, visual "character" will vary widely based on one's location. For example, the visual character of a residential neighborhood may be defined by a pleasing streetscape with mature landscaping and well-maintained residences, while that of a commercial area may be defined by the age, style, and mix of uses; the pedestrian scale (or lack thereof); landscaping; and public amenities.

In urban settings, the visual character may be qualitatively assessed by the type and density of a particular land use; urban landscaping and site design; architecture; topography; and background setting. Adverse effects to visual character may result from the development of incompatible uses, the absence of required public amenities, poor building siting and design, and/or insufficient, inappropriate, incompatible signage, landscaping, screening, or lighting.

Glare. Glare is a continuous or periodic intense light that may cause eye discomfort or be temporarily blinding to humans. Sunlight reflecting off windows and building surfaces (glare) may affect adjacent uses or interfere with the operation of motor vehicles, aviation, or other activities. Glare can also be produced during evening and nighttime hours by artificial light sources, such as illuminated signage and vehicle headlights. Glare-sensitive uses generally include residences and transportation corridors (i.e., roadways).

Light Sources. A light source is a device or feature that produces illumination, including incandescent bulbs, fluorescent and neon tubes, halogen and other vapor lamps, light-emitting diode (LED) fixtures, and reflecting surfaces or refractors incorporated into a lighting fixture. Any translucent enclosure of a light source is considered part of the light source.

3.1.1.2 Considerations for Visual Impact Assessments

The assessment of visual impacts evaluates changes in conditions from public viewpoints and addresses whether the changes resulting from Project implementation would result in substantially degraded aesthetic conditions. The criteria (thresholds) used to determine whether the Project would result in a significant impact are provided in Section 3.1.6.

[4] City of Lake Elsinore. 2011. *General Plan Environmental Impact Report*, Figure 3.3-5 and Page 3.3-13. December.

[5] Landscape Viewshed 13 refers to the area defined by the General Plan EIR and does not refer to the views of existing conditions or view simulations provided in Tables 3.1.A and 3.1.B.

Visual impacts are simply changes to the environment (measured by the compatibility of the impact) or to viewers (measured by sensitivity to the impact). Together, the compatibility of the impact and the sensitivity to the impact yield the degree of the impact to visual quality.

- **Compatibility of the Impact:** Defined as the ability of environment to absorb the impacts resulting from the proposed Project and the environment having compatible visual character. The proposed Project can be considered compatible or incompatible. By itself, the compatibility of the impact should not be confused or conflated with the value of the impact.

- **Sensitivity to the Impact:** Defined as the ability of viewers to see and care about a project's impacts. The sensitivity to impact is based on viewer sensitivity to changes in the visual character of visual resources. Viewers are either sensitive or insensitive to impacts. Again, the sensitivity of the impact alone should not be confused or conflated with the value of the impact.

  The perception of visual changes to a landscape may vary based on the type of viewer and their sensitivities to visual change. Sensitivity can be determined through an evaluation of attributes related to viewer exposure (proximity, extent or number of viewers, and duration) and viewer awareness (attention, focus, and protection). For the proposed Project, viewer groups included motorists, pedestrians and bicyclists,[6] and surrounding land uses.

  The primary viewers are motorists. Motorists may be defined by their purpose for traveling or their mode of transportation, each with varying levels of sensitivity. For example, while motoring tourists may be more focused on landscapes outside their vehicle(s) and may be moderately sensitive to visual change, commuters may be primarily focused on their end trip, expressing limited interest in the passing landscape and demonstrating a low sensitivity for visual change. Bicyclists and pedestrians would typically be traveling to and from local commercial areas, residences, and transportation facilities (including the park-and-ride bus stop at the Outlets at Lake Elsinore). Although focused on their end destinations, these viewers would experience a longer exposure to the environment and visual changes than motorists; therefore, these viewers may be more sensitive to visual changes.

  CEQA only considers a project's impact on public views, which are those views that can be experienced from a publicly accessible point. Other than local roadways, no publicly accessible areas offering views of the Project site are available from neighboring properties.

- **Degree of the Impact:** Defined as either a beneficial, adverse, or neutral change to visual quality. A proposed project may benefit visual quality by either enhancing visual resources or by creating better views of those resources and improving the experience of visual quality by viewers. Similarly, it may adversely affect visual quality by degrading visual resources or obstructing or altering desired views. A project may have a "neutral" degree of impact to visual quality if the

[6] Collier Road features Class II bike lanes and sidewalks, providing views of the Project site for both bicyclists and pedestrians. Due to distance between the Outlets at Lake Elsinore and residential areas, bicycle and pedestrian activity would generally be limited to persons moving between their vehicles to commercial uses and/or other modes of transportation.

development is consistent with the existing scenic vista and existing landscape and visual character.

The degree to which an activity affects the visual quality of a landscape depends on the visual contrast created between a project and the existing landscape. The contrast can be measured by comparing the project's features with the major features in the existing landscape. The basic design elements of form, line, color, and texture are used to make this comparison and to describe the visual contrast created by the project. Levels of contrast may range from "none," equating to no perceived or visible contrast, to "strong," a condition where the contrast demands attention, cannot be overlooked, and is dominant in the landscape.[7]

Several key views were selected to demonstrate the existing visual condition of the Project site from surrounding public viewpoints. The locations of the selected key views[8] are detailed on Figure 3.1-1 and in Table 3.1.A. To establish the post-development visual condition, visual simulations of these same viewpoints were developed to incorporate the scale, mass, and orientation of the proposed buildings. Table 3.1.B includes a side-by-side comparison of the pre- and post-development conditions at each of the selected viewpoints.

3.1.3 Existing Environmental Setting

The city of Lake Elsinore is located between the Santa Ana Mountains to the south/west and the Temescal Mountains to the north/east.[9] The 140.04-acre Project site consists of undeveloped land, public road rights-of-way (ROWs), and vegetation, including grasses and shrubs. The Project site is located in the northwestern portion of the city, in a developing area near the Interstate (I-)15/Nichols Road interchange. The Outlets at Lake Elsinore is located to the east and northeast of the site between Collier Avenue and I-15. The 140.04-acre Project site is south of the intersection of Baker Street and Pierce Street. The proposed Project includes the Onsite Development Area (65.81 acres), the Offsite Improvement Area including portions of Nichols Road, Pierce Street, and Baker Street, and utility improvements along public ROWs (37.86 acres); a desiccated natural Restoration Area located northwest of Baker Street (33.65 acres); and a Construction/Improvements Buffer (2.72 acres) between Baker Street and the Restoration Area.

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7 Between these levels, "weak" contrast would occur if the change can be seen but does not attract attention. A "moderate" contrast would occur if the change begins to both attract attention and dominate the landscape.

8 Aesthetic impacts on private property are not considered under CEQA. As they are private properties, view impacts from the future residential uses under construction approximately 1,100 feet southwest of the site and commercial uses at the Outlets at Lake Elsinore were not evaluated. Due to limited accessibility and use, view impacts along Baker Street (currently a dirt road) were not considered.

9 The Santa Ana Mountains extend in the north from the Whittier Fault and Santa Ana Canyon, through which the Santa Ana River flows, and end roughly at the Santa Margarita River. The Temescal Mountains extend from the south side of the Santa Ana River southeast, nearly parallel with the Santa Ana Mountains, from which they are separated by the Temescal Valley and Elsinore Valley sections of the Elsinore Trough.

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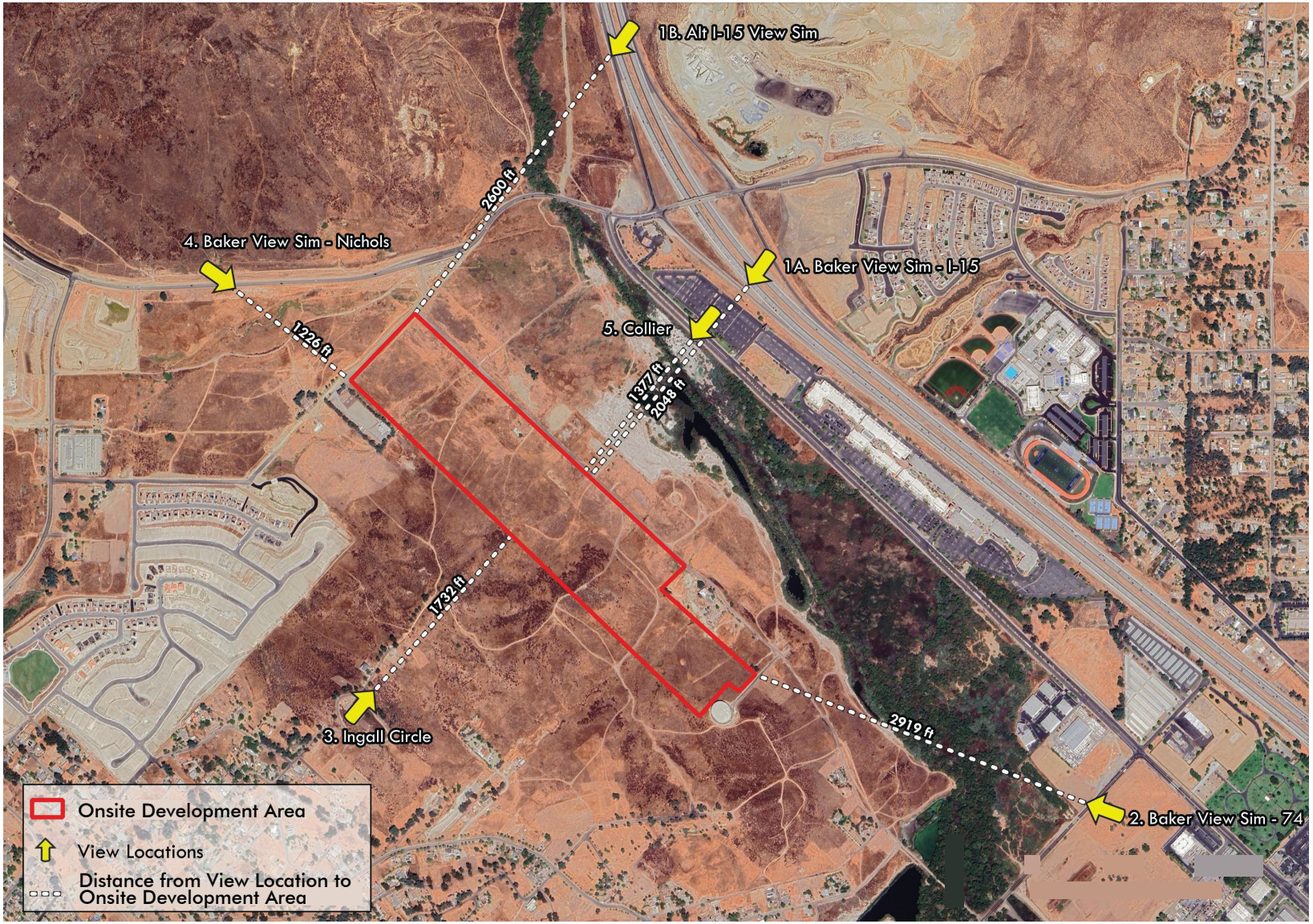

LSA

FIGURE 3.1-1

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FEET

SOURCE: City of Lake Elsinore

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Baker Street Warehouse Project

Key Views

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Table 3.1.A: Key View Summary

Key View	Location	View Condition	Existing View
1A	I-15, south of Nichols Road and north of SR-74 facing the southwest.	This viewpoint of the Project site is located on I-15. This portion of I-15 is currently designated as an eligible State Scenic Highway. The view is oriented southwest and is approximately 2,048 feet northeast of the Project site. The view shows an area that is mostly undeveloped, with the tops of some small structures visible from within the lower grade area and among the distant mountain views. A water tank is present near the top of the hill. **Foreground:** Desert scrub and brush, and the freeway ramp. **Middle Ground**: Treetops, power poles and powerlines, white fencing, a hill with a water tank, and limited views of the tops of cars that are parked within a parking area directly southwest of the freeway ramp. The view of the parking area is mostly obstructed due to it being below the freeway grade and the surrounding tree cover. Long-distance background views include the mountains, a graded hillside, and developed areas on hillsides amongst vegetation. The middle-ground hill rises behind the tree cove. **Background:** Long-distance view of mountains. High powerlines and utility poles are also visible throughout the background.	

Table 3.1.A: Key View Summary

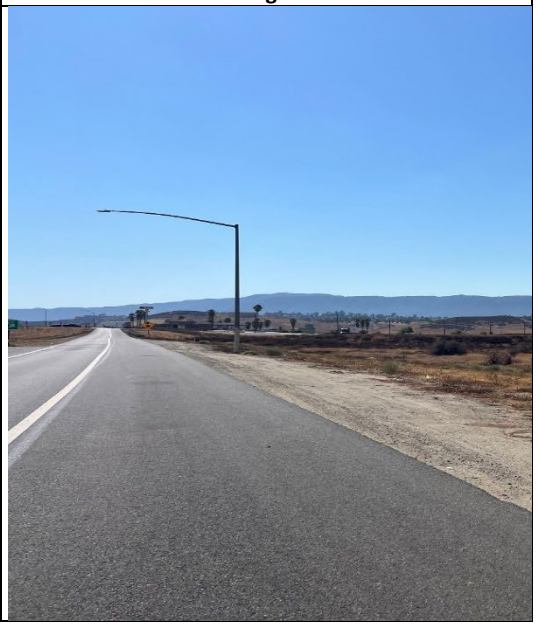
Key View	Location	View Condition	Existing View
1B	Nichols Road at southbound I-15 exit ramp, facing southwest	This viewpoint of the Project site is from the Nichols Road southbound exit ramp approximately 2,600 feet to the northeast of the Project site, facing southwest. **Foreground:** Off-ramp with striped asphalt and the gravel ROW. The grey gravel transitions to sparse brown and green brush and scrub as the landscape slants away from the elevated grade of the roadway. A large streetlight is erected on the side of the ramp. The ROW is bordered by a wire fence that is set back approximately 60 feet from the edge of the roadway. **Middle Ground:** The middle-ground landscape views include rolling hills with a patch of dense deciduous tree cover to the west. The elevated Nichols Road alignment transects the background horizontally, visibly extending from the I-15 ramp and then becoming hidden behind shrubs and trees as the view moves to the west. The top of a gas station is visible directly behind the elevated Nichols Road alignment. Straight, vertical utility poles line Nichols Road, contrasting with the organic shapes and textures of the hillside. **Background**: Background views are of distant mountains and treetops.	

Table 3.1.A: Key View Summary

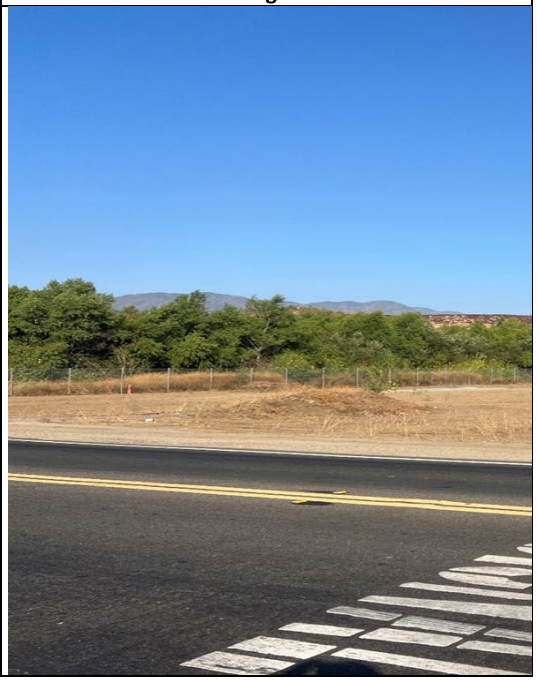
Key View	Location	View Condition	Existing View
2	Northbound SR-74	This view is from the northbound lane of SR-74, approximately 550 feet south of Collier Avenue. The view is approximately 2,900 feet east of the project site. This portion of SR-74 is designated as an eligible State Scenic Highway. **Foreground:** The foreground of the view includes the striped asphalt of SR-74. The immediate roadway ROW is covered with gravel. **Middle Ground:** Beyond the ROW, cover is sparse dry vegetation and ground that appears to have been recently graded. The view is diagonally transected by a chain-link fence with dense green vegetation behind it. A cream-colored box-shaped industrial/warehouse building is visible on the right (directionally northwest of the viewpoint), which is partially obstructed by trees. **Background.** Larger hills are visible in the long-distance background views, rising over the foreground. The hills are predominantly visually obstructed by dense tree cover.	

Table 3.1.A: Key View Summary

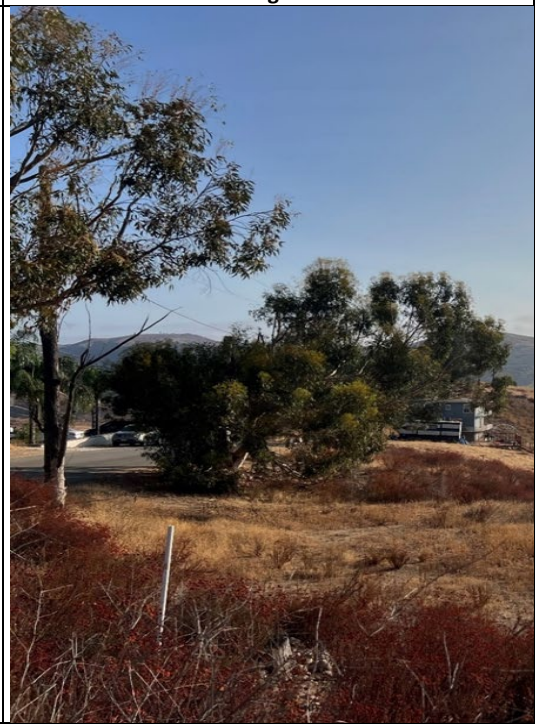
Key View	Location	View Condition	Existing View
3	Ingall Circle	This viewpoint is located on Ingall Circle, a local roadway that serves rural residential properties southwest of the Project site. The viewpoint is approximately 1,700 feet southwest of the Project site and represents the nearest and most unobstructed public vantage point within the residential community nearest to the Project site. The Project site is located behind the hillside that is slanting from the south to the north in this view. **Foreground:** Dried grasses, as well as several individual trees, frame the view. A portion of a driveway that extends from Ingall Circle to two single-family residential lots is visible to the left (directionally northeast). Several cars are parked along the roadway and in an unseen driveway, predominantly obstructed by trees. Several cars are parked along the roadway and in an unseen driveway, predominantly obstructed by trees in the foreground of the view. A wooden deck protrudes from the hillside with an unpaved parking area that backs up to the deck where an RV is parked. **Middle Ground:** A grey-blue, three-level single-family residence is on the hillside behind the trailer and foreground trees. A white-fenced deck wraps around the second and third levels of the house. **Background:** Long-distance views of the mountains line the backdrop of the viewshed.	

Table 3.1.A: Key View Summary

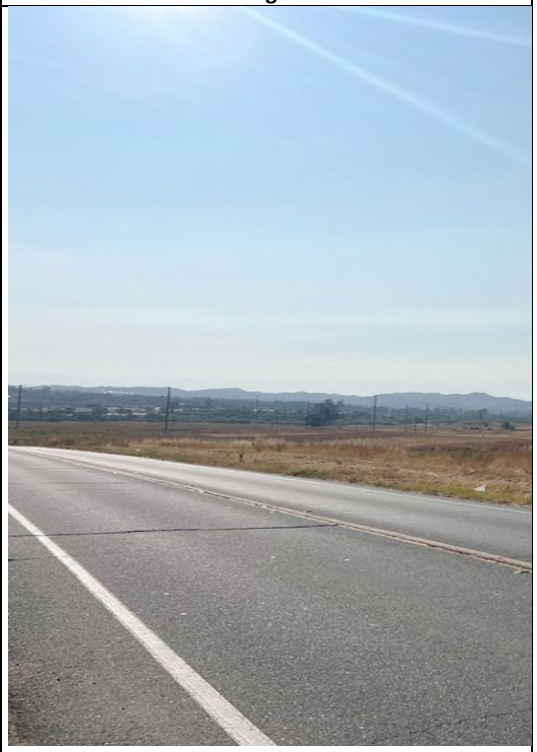
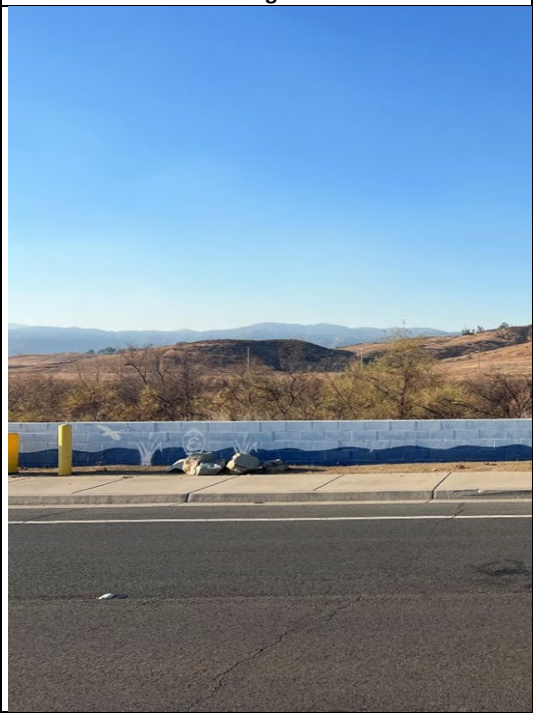
Key View	Location	View Condition	Existing View
4	Nichols Road	This viewpoint is located on Nichols Road, approximately 1,250 feet east of Terra Cotta Road and 1,900 feet west of the Pierce Road intersection. The viewpoint is approximately 1,200 feet northwest of the Project site. This viewpoint represents the highest exposure from Nichols Road to the Project site driving eastbound. This is because the legal posted speed of Nichols Road is 50 mph. Per FHWA guidelines, the viewshed of a motorist traveling 45 mph is approximately 65 degrees (United States Department of Transportation Federal Highway Administration 2015). The Project site begins about 70 degrees to the right of an eastbound motorist's viewpoint, based on the angle of Nichols Road. Beyond this point, the Project site would fall outside the motorist's peripheral viewshed, even though the motorist's proximity to the site becomes closer. Westbound motorists on Nichols Road would not have a significant view of the Project site, as the road angles away from the site, providing only an obtuse-angle or rearview perspective. **Foregound:** The foreground of the view includes the striped asphalt of Nichols Road. **Middle Ground:** Views include the Project site, trees, and a hillside that slopes from the right to the left (directionally west to east). The hill is covered in dried brown grasses and sparsely covered with a few green shrubs. The unseen Pierce Street is set back approximately 1,000 feet. A stand of trees can be seen that completely screen views of two single-family residences. Utility poles and powerlines line an unseen dirt road to the right (directionally east). The large vertical utility poles and powerlines contrast with the organic horizontal lines of dense tree coverage in the distance. **Background:** Long-distance views include hills and mountains, as well as white, grey, and reflective materials of buildings that can be seen between areas of trees.	

Table 3.1.A: Key View Summary

Key View	Location	View Condition	Existing View
5	Collier Avenue	This viewpoint is located on Collier Avenue, approximately 1,100 feet southeast of the Nichols Road intersection. The viewpoint is approximately 1,377 feet northeast of the Project site. The majority of Collier Avenue contains vegetation along the roadway, which obstructs views to the Project site. This portion of Collier Avenue is adjacent to a clearing of vegetation where views to the Project site are the least obstructed. **Foreground:** Striped asphalt of Collier Avenue, a concrete sidewalk, and a half wall that is painted with a light blue and dark blue mural which mimic the outline of the mountains in the background and complement the blue sky. Tops of trees and shrubs rising from the unseen swale on the other side of the half wall can be seen extending a few feet higher than the wall. **Middle Ground**: Views include the Project site, trees, and a hill directly center of the view. The hill is prominent and draws the eye center and upward. The hill is covered in dried brown grasses and sparsely covered with a few green shrubs. A few smaller hills roll across the bottom of the primary hill. **Background:** Includes ridgelines of the Santa Ana Mountains, which draw the eye horizontally from the top of the forefront hill. White, grey, and reflective materials of buildings can be seen to the right of the hill in the foothills of the distant mountains.	

Source: EPD Solutions, Inc., *Baker Street Warehouse Project Visual Impact Assessment*, pages 35-41 (February 2025).
FHWA = Federal Highway Administration
I- = Interstate
mph = miles per hour
ROW = right-of-way
SR- = State Route

Topographically diverse areas of rolling hills with various regional power lines are located to the northwest, west, south, and southeast of the Project site, and a riparian area is located to the northeast and east of the site. Elevations at the site range from approximately 1,400 feet above mean sea level (amsl) at the southwestern boundary of the Onsite Development Area to 1,250 feet amsl at the northeastern limit of the proposed Restoration Area. Portions of the site contain semi-disturbed views of the surrounding foothills and mountain ridgelines. These features limit views of the site from off-site locations.

While no source of nighttime lighting is present on site, sources of nighttime lighting in the vicinity of the site include illumination from vehicle headlights, streetlights from off-site exterior industrial/commercial lighting, and interior illumination passing through windows. Glare in the Project area may be generated by building and vehicle windows reflecting light. As the existing buildings in the immediate Project area are limited to one- and two-story structures that are constructed of nonreflective materials which lack a substantial number of windows that would create a large reflective area, no substantial source of glare is present in the Project area.

3.1.1.3 Project Site and Vicinity

The 140.04-acre Project site is irregular in shape and generally bounded by undeveloped land in all directions. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an above-ground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). The Project site has a history of limited agricultural use; however, no agricultural uses currently exist on the site. Elevations within the Project site range approximately between 1,260 feet and 1,400 feet amsl, inclining gradually to the north and the southwest, with the lowest elevations in the central portion. The proposed Project elements are identified on Figure 3.1-2, Project Elements, and are summarized below.

Onsite Development Area. The 65.81-acre Onsite Development Area consists of undeveloped land formerly utilized for agriculture. The area currently contains naturally occurring vegetation,[10] consisting of low-lying shrubs and grasses. Remnants of a single-family residence (i.e., demolition debris) and portions of a chain-link fence are located within a former residence (17111 Baker Street). A number of dirt trails connecting to and through adjacent properties are present on site. Steel power poles are located along the Project frontage on Baker Street, and wooden power poles run through the site in a southwest-to-northeast direction. Figure 3.1-3, Aerial Views, depicts the existing condition of the Onsite Development Area.

[10] Vegetation on the Project site consists of species that are characteristic of the Coastal Sagebrush community, including California sagebrush, buckwheat, black sage, white sage, lilac, datura, and chollas, as well as introduced weeds and landscaping plants such as tumbleweed and eucalyptus.

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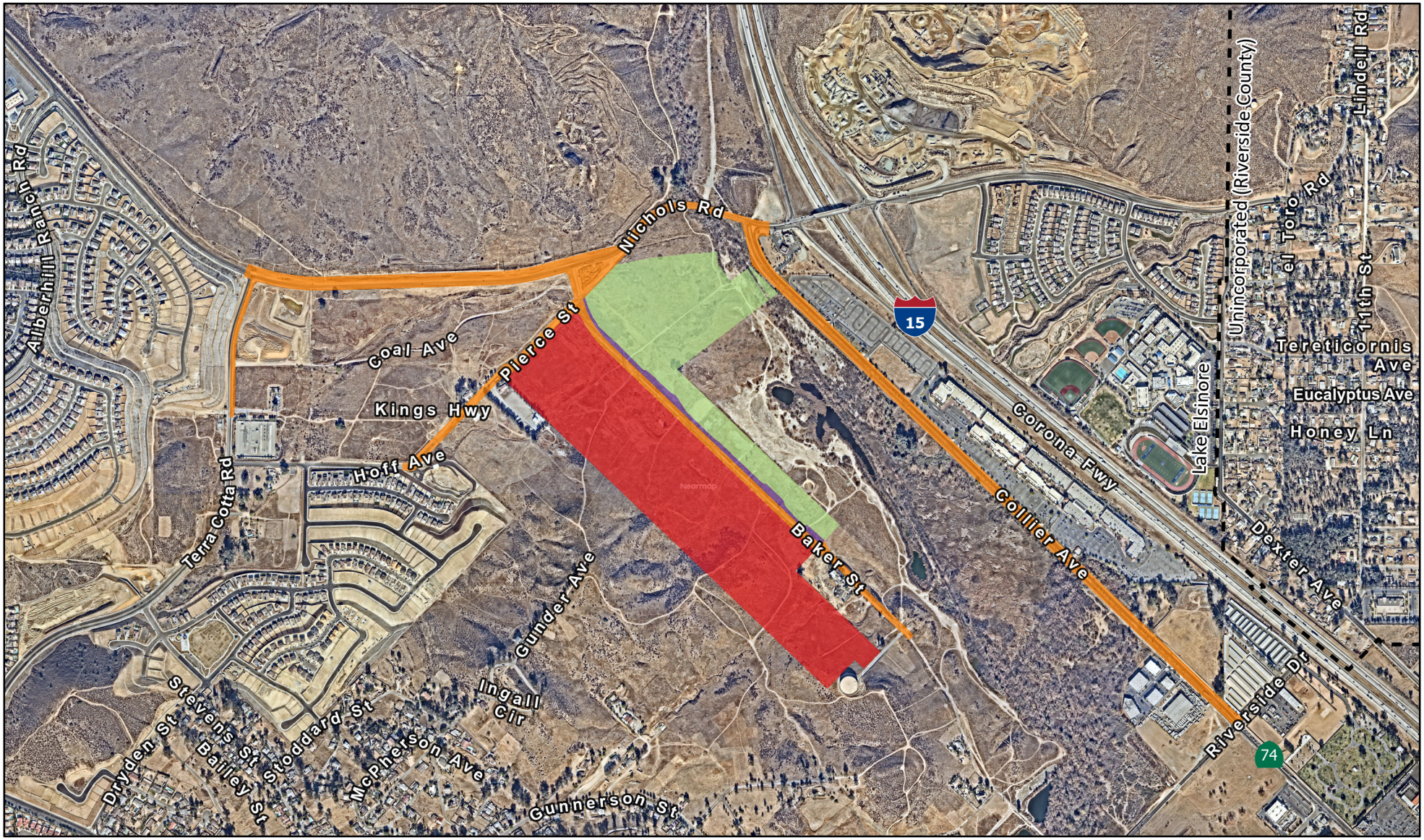

LSA

Construction/Improvements Buffer (2.72 acres)

Onsite Development Area (65.81 acres)

Restoration Area (33.65 acres)

Offsite Improvement Area (37.86 acres)

City Boundary

0 600 1200

FEET

SOURCE: Nearmap (10/12/2025)

FIGURE 3.1-2

Baker Street Industrial Project

Project Elements

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Photograph 1: Aerial view of the Project site looking north from the southern end. The photo depicts existing Baker Street.

Photograph 2: Aerial view of the Project site looking south from northern end. The photo depicts the intersection of Baker Street and Pierce Street in the bottom of the photo with Baker Street extending to the south.

Photograph 3: Aerial view depicting the proposed RCA Conserved Land.

LSA

FIGURE 3.1-3

Baker Street Warehouse Project

Aerial Views

SOURCE: Biological Technical Report for the Baker Industrial Project (Exhibit 12), by Glenn Lukos Associates, Inc. 2023.

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Offsite Improvement Area. The 37.86-acre Offsite Improvement Area includes segments of Nichols Road, Pierce Street, and Baker Street. Baker Street is currently an unimproved dirt road with a 60-foot-wide ROW. A temporary lift station is located at the intersection of Pierce Street and Nichols Road.

Restoration Area. The 33.65-acre Restoration Area consists of shrubs and grasses. Structural foundations from two former residences are located within this area along Baker Street. This area will be preserved for habitat conservation. Refer to Section 3.4, Biological Resources.

Construction/Improvements Buffer. The 2.72-acre Construction/Improvements Buffer consists of vegetation along Baker Street, an unimproved dirt road.

3.1.1.4 Surrounding Land Uses

The undeveloped areas surrounding the Onsite Development Area contain paved and dirt roads, and utility infrastructure (including cell towers and a water storage tank). Beyond the undeveloped areas are single-family residential tracts that are under construction and lower-density rural residential areas to the south, southwest, and northwest of the Project site. Long-distance background views of the Santa Ana and Temescal mountains can be seen from various public roadway locations in the Project vicinity. The condition of the areas surrounding the Project site include:

- **North:** Undeveloped land is located north of Nichols Road and the Project site.
- **East:** Property east of the Project site consists of undeveloped land. A riparian area is located between the Project site and Collier Avenue. Commercial land uses (Outlets at Lake Elsinore) are located east of Collier Avenue, followed by I-15. Undeveloped land and Temescal Valley Canyon High School are located east of I-15.
- **South:** Property south of the Project site consists of generally undeveloped land that contains a water tank operated by the Elsinore Valley Municipal Water District (EVMWD) and a single-family residential land use. State Route (SR-)74 is located approximately 2,900 feet south of the Project site, and Lake Elsinore is located 1 mile south of the Project site.
- **West:** Property west of the Project site consists of a combination of undeveloped land and rural residential uses, graded pads for a residential tract, and the Fogarty Substation, followed by single-family residential land uses.

3.1.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.1.1.5 Federal Regulations

There are no federal policies or regulations related to aesthetics that apply to the proposed Project.

3.1.1.6 State Regulations

Caltrans Scenic Highway Program. The California Department of Transportation (Caltrans) Scenic Highway Program protects the natural scenic beauty of the State's highways and corridors through its designated scenic highways throughout the State. Caltrans defines a scenic highway as any freeway, highway, road, or other public ROW that traverses an area of outstanding scenic quality, containing striking views, flora, geology, and other unique natural attributes. Other considerations given to a scenic highway designation include how much of the natural landscape a traveler may see and the extent to which visual intrusions degrade the scenic corridor.

3.1.4.1 Regional Regulations

Ordinance 655. The County of Riverside (County) has adopted Ordinance 655, Regulating Light Pollution. The intent of this ordinance is to restrict the permitted use of certain light fixtures emitting into the night sky undesirable lightways, which have a detrimental effect on astronomical observation and research at Mount Palomar Observatory. The City recognizes this and encourages lighting in compliance with Ordinance 655 in Section 17.112.040 of its Municipal Code, which encourages the use of shielded, low-pressure sodium lighting in outdoor lighting fixtures.

3.1.4.2 Local Regulations

The City's General Plan, Chapter 2.0 (Community Form), contains goals and policies focusing on (among other topics) urban design and community character. Relevant policies contained in the Community Form Element that relate to aesthetics are identified below.

- **Policy 1.1:** Promote innovative site design, and encourage the preservation of unique natural features, such as steep slopes, watercourses, canyons, ridgelines, rock formations, and open space with recreational opportunities.

- **Policy 3.2:** Encourage new commercial and/or industrial developments [to] incorporate buffers which minimize the impacts of noise, light, visibility, or activity and vehicular traffic on residential uses and MSHCP conservation areas.

- **Policy 13.2**: Discourage extractive uses or development that entails excessive light and glare visible from private and public viewpoints.

General Plan Chapter 4*,* Resource Protection and Preservation, includes information regarding the City's scenic resources and goals and policies related to preservation of locally and regionally important aesthetic features. Relevant policies contained in the Resource Protection and Preservation Element that relate to aesthetics are identified below.

- **Policy 3.3:** Development on steep slopes in public or private property shall require contour grading.

- **Policy 11.1**: For new developments and redevelopment, encourage the maintenance and incorporation of existing mature trees and other substantial vegetation on the site, whether naturally occurring or planted, into the landscape design.

- **Policy 12.1:** Encourage development designs and concepts that provide public views of Lake Elsinore and local ridgelines through proper siting, building design, and landscape design.

- **Policy 13.3:** Require grading plans for any hillside development to include specifications for revegetation and new planting to minimize hillside scarring.

The City's Good Neighbor Policy (City Council Policy No. 400-16) provides a framework for larger-scale warehousing, logistics and distribution projects to be designed and operated in order to mitigate negative impacts on sensitive receptors and the environment and to preserve and advance the City Council's vision as set forth in the City's General Plan. This policy is meant to apply Best Management Practices (BMPs) to help minimize potential impacts to sensitive receptors[11] and will be used in addition to applicable requirements of the City's Zoning Code and CEQA. This policy provides a series of development and operational criteria that can be implemented to supplement project-level mitigation measures in order to adequately mitigate impacts related to warehousing, logistics, and distribution land uses on sensitive receptors, which include:

- Requirement for 1,000-foot minimum setback(s) from sensitive receptors or justification supporting a lesser separation, but in no case less than 300 feet of separation from an existing sensitive receptor to truck bays, loading docks, active truck operations areas, outdoor storage areas, or any buildings;

- Provision of adequate on-site parking for trucks and passenger vehicles, adequate site queuing located away from sensitive receptors, and prevention of spill-over of truck queuing onto surrounding public streets;

- Placement of access gates to provide adequate stacking distance at entries and prevent the queuing or circling of vehicles on public streets in the immediate areas of Project entries;

- Provision of full screening of the Project perimeter with landscaping and masonry screening walls along all bordering streets and adjacent to the property lines of sensitive receptors;

- Articulation of publicly viewable building façades by varying colors, exterior building materials, decorative accents, and/or articulated features, and design of ground-level or pedestrian entries to provide shade and visual relief;

- Compliance with South Coast Air Quality Management District (SCAQMD) regulations during all Project grading activities;

- Incorporation of the highest tier of California Air Resources Board (CARB) technology available at the time of construction and electrification of the site during construction and operation;

[11] Sensitive receptors generally include residences, schools, parks, playgrounds, community centers, assisted living facilities, day-care centers, nursing homes, hospitals, places of religious assembly or institution, and similar uses.

- Establishment of a Property Maintenance Program that provides for regular maintenance of the building, landscaping, and paved surfaces;
- Adherence to the City's Noise Ordinance during site preparation and construction;
- Coordination with SCAQMD and CARB relative to air quality concentrations, health risks, and trucking operations;
- Restrictions on hours of operation adjacent to sensitive receptors, except where the operator demonstrates noise from operations is adequately mitigated and shielded, and total prohibitions on the idling of refrigerated trucks outside facility hours of operation;
- Prohibition of noise exceeding 65 A-weighted decibels (dBA) at the property line of sensitive receptors during hours of operation.

The City's Municipal Code includes the following sections relevant to the Project:

- Section 17.112 establishes development standards for nonresidential development within the city.
- Section 117.112.040, Lighting, specifies that all outdoor lighting fixtures in excess of 60 watts shall be oriented and shielded to prevent direct illumination above the horizontal plane passing through the luminaire and prevent any glare or direct illumination on adjacent properties or streets. Due to the City's proximity to the Mount Palomar Observatory, the use of low-pressure sodium lighting shall be encouraged.
- Section 17.112.110, Design, states that the city is primarily a rural-residential community; accordingly, commercial and industrial development should be designed to reflect the residential nature and character of Lake Elsinore and to recognize and maintain the development patterns, landscape features, materials and forms that are fundamental to its environmental setting. A visitor to the city should not sense a great distinction between land use zones, but rather should find such similar attributes as well-landscaped yard areas and attractive and visually interesting buildings providing a harmonious transition between districts.
- Section 17.140, M-2 General Manufacturing District, contains development standards specific to development proposed within the M-2 zone. Development standards provide requirements related to lighting, landscaping, fencing and walls, parking, and other design principles. Buildings within the M-2 zone are limited to 45 feet and an average of 20-foot setbacks (with 15 feet as the minimum).

3.1.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the Project would have a significant adverse impact with respect to aesthetics if it would:

Threshold 3.1.1: Have a substantial adverse effect on a scenic vista,

Threshold 3.1.2: Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway,

Threshold 3.1.3: In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality, or

Threshold 3.1.4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.6 Project Impacts

Threshold 3.1.1: Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Scenic vistas are panoramic views of important visual features, as seen from public viewing areas. The City has a primary interest in protecting views of Lake Elsinore (the lake) as a scenic resource within the region. Further, designated scenic vistas within the city of Lake Elsinore and its surrounding Sphere of Influence include Lake Elsinore, the Cleveland National Forest (Santa Ana Mountains), rugged hillside land, distant mountains and ridgelines, rocky outcroppings, streams, undeveloped land with native vegetation, parkland, and buildings of historical and cultural significance.

The Project site is located in the northwestern portion of the city and has limited views of surrounding scenic resources and natural features, including the Santa Ana Mountains to the south and west, as well as hillsides to the north. The Project site is located outside of the Lake Elsinore viewshed.[12] The Project site does not currently provide public views to surrounding scenic resources, nor is it located within a scenic resource area. Adjacent roadways provide views of mountains and hillsides to motorists. Long-distance background views of the surrounding mountains to the north and hills to the south are intermittently available from public vantage points along Baker Street and I-15 traveling north and south, and along Nichols Road traveling east and west. Views of surrounding mountains and hillsides are partially obstructed by surrounding commercial and residential development, utility lines, and trees.

Construction. Construction is anticipated to occur over 16 months and would include construction of two warehouses in the Onsite Development Area, ROW improvements in the Offsite Improvement Area, restoration of the 33.65-acre Restoration Area, and activity within the Construction/Improvements Buffer along Baker Street. Construction activities and the staging of construction equipment could result in temporary visual intrusion to the surrounding landscape. However, impacts would be temporary, all equipment would be removed, and disturbed areas would be restored to similar or improved conditions following Project completion. Therefore,

[12] Lake Elsinore is not visible from the Project site due to intervening presence of hills southeast of the Project site (Lake Elsinore General Plan, Section 3.3-2).

Project construction would result in less than significant impacts on a scenic vista. In the absence of a significant impact, no mitigation is required.

Operation. Proposed on-site development would occur on 65.81 acres. The Project would include development of two new warehouse buildings totaling a combined 1,000,451 square feet of building space. Building 1 would consist of a 212,028-square-foot building with 23 dock doors along the southwest side of the building. Building 2 would encompass 788,423 square feet and would include 110 dock doors along the northeast side of the building. Building 1 would be located at the northwestern end of the site, and Building 2 would be located at the southeastern end of the site. The proposed parking lot (on the east side of the buildings) and the buildings would be set back a minimum of 24 and 147 feet, respectively, from Baker Street. The parking lot and drive aisle would be set back a minimum of approximately 48 feet from the western property boundary. The setbacks from the western property boundary for Buildings 1 and 2 are approximately 98 and 181 feet, respectively.

Good Neighbor Policy. To varying degrees, the Project would be visible from I-15, Ingall Circle, and Nichols Road. The Project would be subject to the City's "Good Neighbor Policy," which applies to warehousing, logistics, and distribution uses with buildings 250,000 square feet or larger.[13] The policy includes construction best practices designed to minimize potential impacts on surrounding land uses. Relative to aesthetics, Good Neighbor Policies include the provision of full screening of the Project perimeter with landscaping; masonry screening walls along all bordering streets and adjacent to property lines of sensitive receptors; and articulation of public viewable building façades by varying colors, exterior building materials, decorative accents, and/or articulated features. The building exterior would predominantly consist of painted concrete in shades of cream and grey, aluminum canopies, and stone accents. The building exterior would contain green reflective-glazed windows dispersed along the building façade within cutouts of the concrete exterior but would not include large areas of reflective surfaces. The Project has been designed to screen loading and unloading activities away from nearby residential land uses. The truck court associated with Building 1 would be screened from the residences west of the building. Loading and unloading activities would be on the northeast of Building 2 to screen these activities from the residential land uses southwest of the building. The hills abutting the site to the southwest would further screen the site from the residentially zoned properties southwest of the site. The proposed Project would include landscaping on the site and along Baker Street. Landscaping would be planted along the Project frontage and a landscaped 10-foot-wide parkway (within the Southern California Edison [SCE] easement paralleling Baker Street). The parkway would be landscaped with a variety of shrubs, grasses, and groundcover and would include planting of California juniper and scrub oak throughout the parkway easement and larger trees at corners. Near Building 1, smaller trees, shrubs, and groundcover would provide a buffer between the employee parking areas and Baker Street. Landscape coverage on the parcel containing Building 1 would be approximately 26 percent, while landscape coverage for Building

[13] As previously noted, Building 1 would consist of a 212,028-square-foot building and Building 2 would encompass 788,423 square feet; therefore, the Good Neighbor Policy would apply to Building 2 only.

2 would be approximately 32 percent. Overall, landscape coverage for the Onsite Development Area would be approximately 31 percent.[14]

The proposed Onsite Development Area would introduce new permanent visual components to the existing visual setting, while the Offsite Improvement Area, Restoration Area, and Construction/Improvements Buffer would only result in potential temporary visual changes or minor permanent visual changes, such as roadway widening and improvements. A side-by-side comparison of the existing and post-development views is provided in Table 3.1.B. A narrative of the post-development aesthetic condition at each viewpoint follows Table 3.1.B.

Key View 1A (Interstate 15, south of Nichols Road). Views of the proposed Project buildings' east elevations from this viewpoint would be largely obstructed by the natural grade differential and existing trees in the midground. From a distance of approximately 2,048 feet, portions of Building 1 would be visible through breaks in tree coverage, while only a portion of Building would be visible within the view. Applicable Good Neighbor Policies would include screening, landscape, and façade articulation requirements. As previously stated, the Project provides sufficient screening and landscaping along the site perimeter and along adjacent streets. The building exterior would consist of painted concrete in shades of cream and grey, aluminum canopies, and stone accents. The building exterior would contain green reflective-glazed windows dispersed along the building façade within cutouts of the concrete exterior.

The building's long horizontal roofline would parallel the lines of the roadway and fencing in the foreground while simultaneously contrasting with the organic lines of the hill and mountains in background. The contrast between the building's architecture and the natural form of the background would be further accentuated by the building's geometrically uniform, long, rectangular windows. The building's smooth, bright cream and grey exterior would be pronounced against the darker brown and green earth tones within the backdrop and foreground. The smooth texture of the building façade would be visibly different from the surrounding environment, which is marked by the rough texture of the soil and scrub in the foreground, trees and hillside in the midground, and mountains in the background.

The fence, power poles, and roadway intersect the landscape, similarly providing a contrast in color and texture to the surrounding natural environment. The proposed buildings would be relatively small in scale compared to the surrounding topographic features, which generally dominate the viewshed, which is part of Landscape Viewshed 13. The development would add new visual elements to the landscape but would be generally consistent with the existing zoning and quality of the view, as the view contains foreground views of the freeway on-ramp, fencing, and power poles, as well as distant views of existing buildings in the background, signage for the neighboring commercial center, and utility lines and parking structures supporting surrounding development. The proposed structures would be similar to the Outlets at Lake Elsinore buildings, adjacent to I-15, that are long, linear, and beige and khaki. The proposed Project buildings would

[14] Building 1 parcel = 25.94 percent; Building 2 parcel = 32.12 percent; overall landscape coverage = 30.94 percent.

be partially screened from view (see Key View 1 in Table 3.1.B.). The level of contrast would be moderate and consistent with the level of contrast of other development near the site.

From this viewpoint, visible features include existing development along I-15, including a gas station, a commercial center, power lines, and surrounding parking lots. The buildings would be largely obstructed by the natural grade differential and existing off-site trees located between the site and the key view location. Portions of Building 1 would be visible through breaks in tree coverage, while only a portion of Building 2's roofline would be visible from this viewpoint. Additionally, due to their height and distance from the key view location, the buildings would not obstruct view of the Santa Ana Mountains. Elements of existing development to the northeast, including signage, parked cars, power lines, and a gas station, already disrupt existing hillside views; therefore, while the proposed buildings would add a new visual urban element to existing Landscape Viewshed 13, these changed views would not result in an impact to views of "rugged, vacant hills." Views of the proposed structures from I-15 would be similar to other developed areas of the city adjacent to I-15; therefore, the Project would not result in significant impacts to a scenic vista from this key view location, and no mitigation is required.

Key View 1B (Nichols Road at Southbound I-15 Off-Ramp). The proposed buildings would be within middle-ground views and sit at a slightly elevated grade in this viewpoint from I-15. At a distance from approximately 2,600 feet, views of the proposed Building 2's east elevations would be predominantly unobstructed and visible from the roadway, while Building 1 would be completely obstructed by dense tree cover to the north and the visual limits of the viewshed. Several ornamental and native trees provide visual screening, breaking up the long eastern building façade.

The building's long, rectangular shape draws the viewer's eye diagonally toward a central focal point where the roadway and horizon merge. The grade of the building falls within the alignment of the existing parking lot and gas station on a raised pad with a vegetated slope. The straight symmetrical lines of the building would contrast with the rugged lines of the hilly and mountainous landscape but accent the straight, white lines of the striped roadway. The contrast between the building's architecture and the natural form of the background would be further accentuated by the building's geometrically uniform long, rectangular windows. The building's smooth cream and grey exterior would be pronounced against the darker brown and green earth tones within the backdrop and foreground. The smooth texture of the building façade would be visibly different from the surrounding environment, which is marked by the rough texture of the soil and scrub in the foreground, trees and hillside in the midground, and mountains in the background. The roadway intersects the landscape, similarly providing a contrast in color and texture to the surrounding natural environment (see Key View 2, Table 3.1.B.).

Table 3.1.B: Key View Comparison

Key View	Existing Condition	View Simulation – With Project
1A I-15, south of Nichols Road and north of SR-74 facing the southwest		

Table 3.1.B: Key View Comparison

Key View	Existing Condition	View Simulation – With Project
1B Nichols Road at southbound I-15 exit ramp, facing southwest		

Table 3.1.B: Key View Comparison

Key View	Existing Condition	View Simulation – With Project
2 Northbound SR-74		

Table 3.1.B: Key View Comparison

Key View	Existing Condition	View Simulation – With Project
3 Ingall Circle		

Table 3.1.B: Key View Comparison

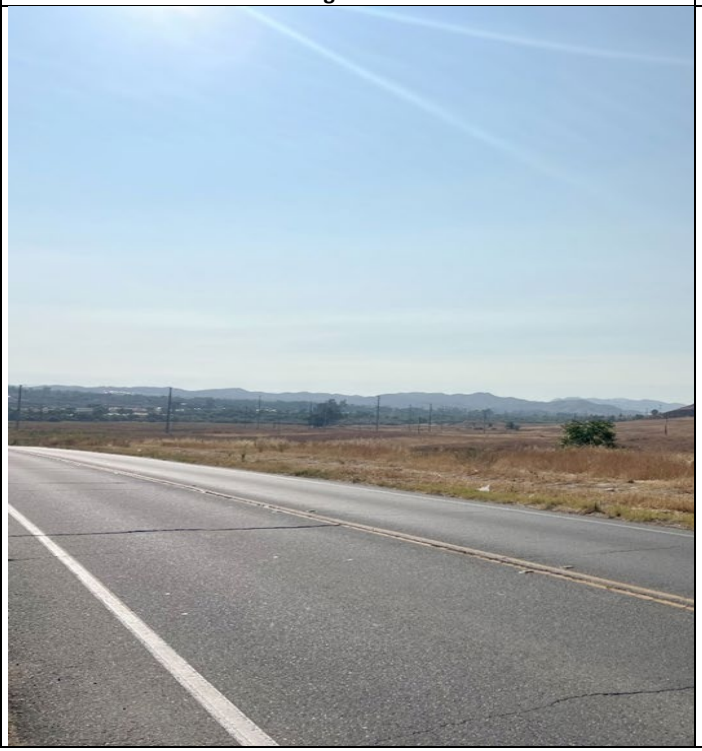
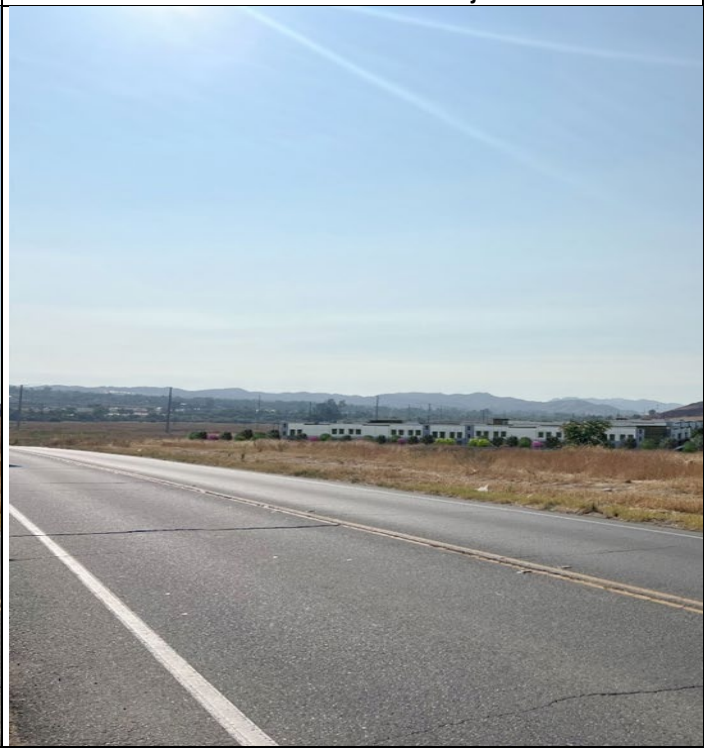
Key View	Existing Condition	View Simulation – With Project
4 Nichols Road		

Table 3.1.B: Key View Comparison

Key View	Existing Condition	View Simulation – With Project
5 Collier Avenue		

Source: EPD Solutions, Inc., , *Baker Street Warehouse Project Visual Impact Assessment*, pages 35-41 (February 2025).

As stated previously, the Project's articulated façade, masonry screening walls, and landscaping address the standards established in the City's Good Neighbor Policy relative to aesthetic conditions for nearby uses. Due to its distance from I-15 and the height of the hills and mountains in the background, the proposed building would be relatively small in scale compared to the surrounding topographic features and roadway, which generally dominate Landscape Viewshed 13. The Project would be generally consistent with the quality of the view, as the view contains street lighting, fencing, a gas station, a water tank on the hillside, and utility lines and parking structures supporting surrounding development; however, because views of the Project buildings would contrast with the predominant views of trees, hills, and mountains, the level of contrast would be moderate, which is consistent with views within the city from southbound I-15.

Views from I-15 at this key view location include a natural and undeveloped hillside landscape with panoramic views of the Santa Ana Mountains in the background. Existing urban elements include wire fencing, streetlights, power lines, and a gas station. The proposed buildings would be located within middle-ground views and would sit at a slightly elevated grade compared to the key view location. View of Building 2's east elevation would be predominantly unobstructed and visible from the roadway, while Building 1 would be completely obstructed by dense tree cover. Building 2 would obstruct the lower slopes of the adjacent hillside but would not hinder views of the hillside's higher ridgelines or more distant views to the Santa Ana Mountains. The buildings would not impact background views of "rugged, vacant hills." Post-development, the view from I-15 at this location would be similar to other developed areas of the city along I-15; therefore, the Project would not result in significant impacts to a scenic vista from this key view location. No mitigation is required.

Key View 2 (Northbound SR-74, South of Collier Avenue). SR-74 is eligible for formal designation as a State Scenic Highway; however, neither the City nor the County has nominated this portion of SR-74 for official designation, and no Corridor Protection Program[15] has been adopted. Nevertheless, an analysis of potential view impacts from SR-74 is included. The Project site is located approximately 2,900 feet to the west of SR-74. Views of the site are completely obstructed by dense tree coverage between the viewpoint and proposed buildings. The yellow outline detailed in the post-development view simulation from this location (see Table 3.1.B) shows the scaled model of the Project buildings to identify the location and scale relative to the viewer traveling along SR-74. As the buildings would not be visible from this location, no contrast in views would occur.

Because views from this key view location to the proposed buildings are completely obstructed, no perceived change in the aesthetic condition would occur. Therefore, no impact to any scenic vistas from this location would occur, and no mitigation is required.

[15] A Corridor Protection Plan (CPP) summarizes the city or county ordinances, zoning, and/or planning policies that preserve the scenic quality of the officially designated scenic highways. These locally adopted CPPs identify the existing and, as necessary, additional protection measures needed by local government(s) to: regulate land use and density of development; provide site and land planning; control outdoor advertising; control earthmoving and landscaping; and guide the design and appearance of structures and equipment.

Key View 3 (Ingall Circle). From this key view (approximately 1,730 feet from the Project site), the hill's topography almost completely obstructs the Project. The grade differential between the nearest and most unobstructed public vantage point at this viewpoint and the Project area greatly diminishes visibility of the Project site. The yellow outline (see Key View 3, Table 3.1.B) indicates the outline of the proposed buildings. A very small portion of Building 2's roof would be visible from behind the hill. The Project buildings would be barely perceptible compared to the overall Landscape Viewshed 13, which is dominated by the sprawling valley and distant mountain views. As the Project would be minimally visible and blend into the existing Landscape Viewshed 13, the level of contrast would be weak.

The viewpoint from Ingall Circle is oriented northeast toward the Project site from the top of a hill (see Key View 3, Table 3.1.B). The view includes a hilltop that extends from Ingall Circle to a driveway containing two single-family residential units. The hilltop provides an expansive view of mountains and the valley floor between the base of the hill and surrounding mountains. Residential and nonresidential development is visible within the valley and mountain foothills. The buildings would be constructed northeast of the hill. The Project would be almost completely obstructed by the hill's topography. The dramatic grade differential between the hilltop viewpoint and underlying valley where the buildings are proposed would greatly diminish the visibility of the Project site. The yellow outline indicates the location and scale of the buildings behind the hill from the viewpoint. A very small southern portion of Building 2's roof would be visible along the side of the hill. The building would generally blend into the background and would not be noticeable compared to the overall Landscape Viewshed 13, which is dominated by the hill, a sprawling valley, and distant mountain views. The Project would not result in significant impacts to a scenic vista from Ingall Circle, and no mitigation is required.

Key View 4 (Nichols Road, West of Pierce Street). This viewpoint is approximately 1,220 feet from the Project site. The middle-ground view of the Project site from Nichols Road includes a hill with two single-family residences on the top with trees and a hillside that slopes from west to east. Power poles and powerlines are located in the midground, transecting the flat vegetated area, and in front of the hill. Long-distance views of distant mountains and development are visible between areas of trees.

The elevation of Nichols Road is approximately 1,310 feet amsl. At Building 1, current elevations range from 1,286 feet to 1,265 feet amsl. The Project includes engineered earthworks to provide a suitable building pad. The finished floor elevation of Building 1 would stand between 1,280 and 1,282 feet amsl (or approximately 27 to 20 feet lower than Nichols Road). At Building 2, existing grades range from 1,381 feet to 1,262 feet amsl. As with Building 1, engineered earthworks would raise the floor grade of Building 2 to approximately 1,285 feet amsl, which would be 25 feet lower than Nichols Road. Under the post-development condition, both building pads would remain below the grade of Nichols Road, which would contribute to a perceived reduction in the visual height and mass of the buildings from Nichols Road. (Refer to Key View 4 in Table 3.1.B.)

The building's rectangular shape would offer a stark contrast in the Project area, which does not contain any development surrounding the Project site except for two small rural residences that would be screened from the proposed building by existing trees located west of the building site. Views of the undeveloped grassy hillside grassland would be blocked by the proposed building,

which would become a focal point at this key view. Due to the distance from Nichols Road and the height of the hills and mountains in the background, the proposed building would be moderate in scale compared to the surrounding topographic features, which would continue to dominate the overall Landscape Viewshed 13. Due to the change to the middle-ground views, the level of contrast would be strong.

The straight symmetrical lines of the building would contrast with the rugged lines of the hilly and mountainous landscape but accentuate the straight white and yellow lines of the striped roadway. Contrast between the building's architecture and natural form of the background would be further accentuated by the building's geometrically-uniform long rectangular windows. The building's smooth cream and grey exterior would be pronounced against the darker brown and green earth tones within the backdrop and foreground. The smooth texture of the building façade would be visibly different from the surrounding environment, which is marked by the rough texture of grasses and scrub in the foreground, trees and hillside in the midground, and mountains in the background. The roadway runs at a parallel skew to the landscape, providing a contrast in color and texture with the surrounding natural environment similar to the building. The proposed buildings would be relatively small in scale compared to the surrounding topographic features and roadway, which generally dominate Landscape Viewshed 13, but would be much larger than the two existing residences to the west. This would provide a contrast in the overall character of the view. Distant development is visible within the hillside of the mountain side of the background, and utility poles can be seen traversing the horizon of the view. However, these features are located in long-distance background views and are minimally intrusive.

The proposed buildings would be 1,200 feet from Nichols Road and at a slightly higher grade than in the existing condition. The view is oriented to directly face the northern end of Building 1. The view of Building 1 would be predominantly unobstructed and visible from Nichols Road. Building 2 would be mostly screened from view by the mass of Building 1, with the exception of a small portion of the building's western façade and roof. Ornamental shrubs that would be part of the proposed landscaping would provide a buffer between the building and surrounding vegetation. While the Project would introduce urban uses into the existing landscape, the proposed buildings would not be within the line-of-sight of "rugged, vacant hills" and would not obscure the profile of distant hills or mountains. As stated previously, the articulated façade, masonry screening walls, and Project landscaping address the standards established in the City's Good Neighbor Policy relative to aesthetic treatments. Therefore, the Project would not result in a significant impact to a scenic vista from Nichols Road, and no mitigation is required.

Key View 5 (Collier Avenue, South of Nichols Road). This viewpoint is approximately 1,380 feet from the Project site. The proposed buildings would sit at a slightly elevated grade compared to Collier Avenue (approximately 15 and 17 feet higher for Buildings 1 and 2, respectively). As the buildings would be located approximately 1,377 feet from Collier Avenue, compared to the hillside behind the development, the perceived height of the building would be minimal. The northeastern façades of Buildings 1 and 2 would be visible from this key view, though Building 1 would be predominantly obstructed by vegetation along Collier Avenue. Building 2 would be predominantly visible with a few minor obstructions from the tops of trees and shrubs adjacent to Collier Avenue.

The Project would introduce a new urban component into the landscape. The building's long, rectangular shape draws the eye horizontally, mimicking the lines of the low wall in the foreground and the mountains in the background. The straight symmetrical lines of the building would complement the horizontal directionality of the mountains and low wall. The straight geometrical lines of the building roofline and windows would contrast with the rugged lines of the hilly and mountainous landscape but accentuate the straight line of the low wall and roadway. The contrast between the building's architecture and the natural form of the background would be accentuated by the building's geometrically uniform long, rectangular windows. The building's smooth cream and grey exterior would be pronounced against the darker brown and green earth tones within the backdrop and foreground. The smooth texture of the building façade would be visibly different from the surrounding environment, which is marked by the rough texture of grasses and scrub in the foreground, trees and hillside in the midground, and mountains in the background. While development is visible on the nearby hillsides and utility poles are visible across the horizon from this key view, these features are components of the background views, are minimally intrusive, and do not cause a visual disconnect between the development site and surrounding natural hillside. Due to the level of change to the middle ground views, the level of contrast would be strong.

Views of the lower slopes of the hillside would be partially obstructed by the proposed Building 2 that would become a focal point. However, due to the distance from Collier Avenue, Building 2 would be minimal in scale compared the overall bulk of the hillside that would rise above the rooflines of the buildings and would continue to generally dominate Landscape Viewshed 13. As stated previously, the articulated façade, masonry screening walls, and Project landscaping address the standards established in the City's Good Neighbor Policy relative to aesthetic treatments. The mountain ridgelines in the background would remain unobstructed by the proposed buildings. Therefore, no significant impact to a scenic vista would result from Project development, and no mitigation is required.

Summary of Key View Changes. Public views of the Project by motorists would range in sensitivity from low to moderate, and views of the Project by pedestrians and bicyclists sensitivity would be high. The Project would result in visual contrast that ranges from none to strong, dependent on the viewpoint (see Table 3.1.C).

While the Project would introduce a new urban component into the current landscape, due to the distance from public roadways, visual screening from vegetation, and the height of the hills and mountains in the background, the proposed buildings would be moderate in scale compared to the surrounding topographic features (which would continue to generally dominate Landscape Viewshed 13). While the Project would result in a contrast to the existing visual setting, the proposed buildings would not result in a significant impact to views of "rugged vacant hills," since the Project is not within the line of such features. As stated previously, the articulated façade, masonry screening walls, and Project landscaping address the standards established in the City's Good Neighbor Policy relative to aesthetic treatments. Overall, Project operation would not cause a significant adverse visual effect to a scenic vista; therefore, the Project impacts are **less than significant** and no mitigation is required.

Table 3.1.C: Visual Impact Summary by Key View

Key View	Viewer Sensitivity	Visual Contrast	Impact
1A (I-15, south of Nichols Road)	Low/Moderate	Moderate	Moderate
1B (Nichols Road at Southbound I-15 offramp)	Low/Moderate	Moderate	Moderate
2 (Northbound SR-74, south of Collier Avenue)	Low/Moderate	None	None
3 (Ingall Circle)	Low	Weak	Low
4 (Nichols Road, west of Pierce Street)	Low	Strong	Moderate
5 (Collier Avenue, south of Nichols Road)	Low/High	Strong	High

Source: EPD Solutions, Inc., *Baker Street Warehouse Project Visual Impact Assessment,* Table 8. (February 2025).
I- = Interstate
SR- = State Route

Threshold 3.1.2: Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Less than Significant Impact. The Project site is located near SR-74 and I-15. SR-74 from near San Juan Capistrano to Post Mile (PM) M 48.3 east of the city of Hemet[16] is eligible for designation as a State Scenic Highway.[17] The Project site is approximately 2,900 feet west of SR-74. Views of the Project site are completely obstructed by dense tree coverage between SR-74 and proposed buildings. Interstate 15 (I-)15 from near the San Luis Rey River in San Diego County (PM R46.5) to SR-91 is eligible for designation as a State Scenic Highway. I-15 is approximately 650 feet northeast of the Project site. Neither highway has been nominated for designation by the County or City for State Scenic Highway status; therefore, neither highway is a State Scenic Highway. No roadways in the city have been formally designated as scenic. The Project site does not contain historic buildings or prominent rock outcroppings. The Project would include a restoration area directly adjacent to the northeast of the proposed buildings, which could include the addition of trees and vegetation.

Chapter 4, Resource Protection and Preservation, of the City's General Plan identifies views of undeveloped, rugged hills and views of Lake Elsinore as potential local scenic resources in the city. As discussed previously, the Project site would not be visible from SR-74. However, the Project would be minimally visible from the I-15 corridor (refer to Key Views 1A and 1B in Table 3.1.B.) The proposed buildings would be relatively small in scale compared to the surrounding topographic features, which would generally still dominate Landscape Viewshed 13. While the proposed buildings would add a

16 From PM 48.3 (the boundary of the San Bernardino National Forest east of Hemet), SR-74 is an officially designated (October 18, 1971) scenic highway (Pines to Palm Highway) through to Route 111 in Palm Desert.

17 California Department of Transportation (Caltrans). 2015. List of Eligible and Officially Designated State Scenic Highways. Last modified July 2019. Website: https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx (accessed: March 7, 2025).

new visual element to the existing Landscape Viewshed 13, the new views would be consistent with views within the city from southbound I-15 in the vicinity of the site. Due to the buildings' height and location relative to I-15, no obstruction of distant mountain views would occur. Also, as previously discussed, the Project is not located near a designated State Scenic Highway. Impacts relative to scenic resources, including trees, rock outcroppings, and historic buildings within a State scenic highway, would be **less than significant**; therefore, no mitigation is required.

Threshold 3.1.3: **In nonurbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

Less than Significant Impact. As described in *CEQA Guidelines* Section 15387 and defined by the United States Census Bureau, an "urbanized area" is a central city or a group of contiguous cities with a population of 50,000 or more people, together with adjacent densely populated areas having a population density of at least 1,000 people per square mile. As detailed in Section 3.14.3.1, Population and Housing, of this EIR, the population of the City of Lake Elsinore is approximately 73,028, with a density of 1,837.6 persons per square mile;[18] therefore, the Project site is located within an urbanized area, and this analysis focuses on the Project's potential to conflict with applicable zoning and other regulations governing scenic quality.

Pursuant to Public Resources Code (PRC) Section 21071(a), for an incorporated city, "urbanized area" means either of the following:

1) Has a population of at least 100,000 persons.

2) Has a population of less than 100,000 persons if the population of that city and no more than two contiguous incorporated cities combined equals at least 100,000 persons.

The Project site is located within the city of Lake Elsinore, an incorporated city. Per the United States Census Bureau,[19] the city of Lake Elsinore was estimated to have a population of 73,028 in July 2023. The adjacent city of Murrieta had an approximate population of 111,878 persons in July 2023; therefore, the Project site is located within an urbanized area as defined by PRC Section 21071(a)(2).

The General Plan Land Use designation for the Project site is Limited Industrial (M-1), and a zoning of Limited Manufacturing (M-1) and General Manufacturing (M-2). The M-1 land use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and

[18] United States Census Bureau. 2023. *Quick Facts Lake Elsinore city: United States*. July. Website: https://www.census.gov/quickfacts/fact/table/lakeelsinorecitycalifornia,US/PST045223 (accessed March 6, 2025).

[19] United States Census Bureau. n.d. Website: https://data.census.gov/table/ACSST1Y2023.S0101?g=160XX00US0639486 (accessed December 13, 2024.)

quasi-public uses, and similar and compatible uses."[20] The intent of the M-1 zoning district provides for light industrial uses that are relatively free of nuisance or hazardous characteristics, while the M-2 zoning district provides for a full range of industrial, manufacturing, and related establishments. As part of the Project, the M-1 designated portion of the site is proposed to be amended to M-2 to achieve consistent zoning throughout the development site. The proposed warehouse development is a permitted use in the existing M-1 land use designation and M-2 zoning district. Furthermore, the Project is consistent with the intent and design standards applicable to the M-2 zone and the policies related to aesthetics contained in the City's General Plan (see Tables 3.1.D and 3.1.E, below).

Table 3.1.D: Building 1 Consistency with M-2 Development Standards

Development Standard	Required	Provided
Parking	Office: 1/250 sf Warehouse: 1-20,000 sf: 1/500 sf Warehouse: 20,001+ sf: 1/1,000 sf 212 spaces required	172 spaces[1]
FAR	0.45	0.39
Maximum Structure Height[2]	45 ft	46 ft subject to a Conditional Use Permit
Front Setback (to Building or Parking Lot)	Shall average 20 ft but may be less than 15 ft. A 10 ft reduction to parking may be allowed by the City Council if a decorative wall, artwork, or public amenity is installed.[3]	15 ft from parking lot, 95 ft from building
Interior Setback	Not applicable unless adjacent to a residential use or public right-of-way in which the front setback requirement applies.	48 ft from parking lot, 98 ft from building
Landscape Coverage	Minimum of 12%	25.94%

Source: EPD Solutions, Inc., Baker Street Warehouse Project Visual Impact Assessment, Table 4. (February 2025).Table 4. EPD. Baker Street Warehouse Project Visual Impact Assessment, February 2025

Notes:

[1] A Parking Study was approved to allow for the reduction of required parking stalls. The Project to will be subject to the following parking requirements: – 1 space for each 1,000 sf of floor area for the first 40,000 sf, ; and 1 space for each 4,000 sf of gross floor area for the portion over 40,000 sf; and 1 for each facility vehicle.

[2] The Project is applying for a Conditional Use Permit to exceed building height.

[3] City of Lake Elsinore Municipal Code, Section 17.140.70(A).

FAR = floor area ratio

ft = foot/feet

sf =square foot/feet

[20] City of Lake Elsinore. 2011. *General Plan Environmental Impact Report*, Section 2.0. December.

Table 3.1.E: Building 2 Consistency with M-2 Development Standards

Development Standard	Required	Provided
Parkling[1]	Office: 1/250 sf Warehouse: 1-20,000 sf: 1/500 sf Warehouse: 20,001+ sf: 1/1,000 sf 788 spaces required	295 spaces
FAR	0.45	0.34
Maximum Structure Height[2]	45 ft	50 feet subject to a Conditional Use Permit
Front Setback (to Building or Parking Area)	Shall average 20 ft but not less than 15 ft. A 10 ft reduction to parking may be allowed by the City Council if a decorative wall, artwork, or public amenity is installed.[3]	24 ft from parking lot, 147 ft from building
Interior Setback/Side Setback	Not applicable unless adjacent to a residential use or public right-of-way in which the front setback requirement applies.	181 ft from building
Landscape Coverage	12%	32.12%

Source: EPD Solutions, Inc., *Baker Street Warehouse Project Visual Impact Assessment,* Table 5 (February 2025).
Notes:
[1] A Parking Study was approved to allow for the reduction of required parking stalls. The Project will be subject to the following parking requirements: 1 space for each 1,000 sf of floor area for the first 40,000 sf; 1 space for each 4,000 sf of gross floor area for the portion over 40,000 sf; and 1 for each facility vehicle.
[2] The Project is applying for a Conditional Use Permit to exceed building height.
[3] City of Lake Elsinore Municipal Code, Section 17.140.70(A).
FAR = floor area ratio
ft = foot/feet
sf =square foot/feet

The proposed buildings would exceed the 45-foot maximum building height allowance, as Building 1 would be a maximum of 46 feet and Building 2 would be a maximum of 50 feet. Therefore, the Project would seek the approval of a Conditional Use Permit to exceed the M-2 height standard.

Table 3.1.F provides a summary of the Project's consistency with applicable General Plan and Good Neighbor policies related to aesthetics and visual quality.

Table 3.1.F: Consistency Analysis

Standards	Project Consistency
General Plan Community Form Element	
Policy 1.1: Promote innovative site design, and encourage the preservation of unique natural features, such as steep slopes, watercourses, canyons, ridgelines, rock formations, and open space with recreational opportunities.	**Consistent.** The Project would be within a mostly flat grassy undeveloped area adjacent to surrounding steep slopes. The Project would be designed to accommodate the existing topography of the Project site and adjacent area. Contour grading would be provided from the proposed grading wall to the property line at a maximum slope of 2:1 in compliance with City hillside development policy. Additionally, the Project would not be constructed within a watercourse, canyon, or existing recreational open space. Therefore, the Project is consistent with this policy.
Policy 3.2: Encourage new commercial and/or industrial developments incorporate buffers which minimize the impacts of noise, light, visibility, or activity and vehicular traffic on residential uses and MSHCP conservation	**Consistent.** The Project would be required to comply with the City's Good Neighbor policy, which includes best management practices (BMPs) for the siting and development of warehouse uses near sensitive receptors. Additionally, the Project would be consistent with lighting requirements, and light would be aimed downward and shielded from spilling over onto adjacent land uses. The Project would implement 33.65 acres of habitat restoration on existing habitat between the Project site and highway. This area would be designated for future conservation efforts. The Construction/Improvements Buffer (Construction Buffer) would be located within the Project area between the Baker Street right-of-way (ROW) improvements and the Habitat Restoration Area. The Construction Buffer is included as part of the Project to ensure that any disturbance adjacent to the ROW improvements would not encroach onto the Habitat Restoration Area. This Construction Buffer would be separate parcel from the Habitat Restoration Area. Therefore, the Project would be consistent with this policy.
Policy 3.3: Development on steep slopes in public or private property shall require contour grading.	**Consistent.** The Project would be located within a mostly flat grassy, undeveloped area adjacent to surrounding steep slopes. The Project would be designed to accommodate the existing topography of the Project site and adjacent area. Building 2 would require the cut of an adjacent slope and construction of a retaining wall that would be a maximum height of 46 feet along a portion of the southwest side of the building. Contour grading would be provided from the grading wall to the property line at a maximum slope of 2:1.
Policy 11.1: For new developments and redevelopment, encourage the maintenance and incorporation of existing mature trees and other substantial vegetation on the site, whether naturally-occurring or planted, into the landscape design.	**Consistent.** As shown on Figure 2-5, Project landscaping would include planting of a variety of trees, shrubs, and succulents that would complement the surrounding natural landscaping. Trees would be planted in optimal locations to screen the Project from off-site locations. The Project would not require the removal of any existing trees on the Project site. Additionally, the Project includes a restoration area adjacent to the Project site, which would restore and enhance vegetation to natural vegetative conditions.

Table 3.1.F: Consistency Analysis

Standards	Project Consistency
Policy 12.1: Encourage development designs and concepts that provide public views of Lake Elsinore and local ridgelines through proper siting, building design, and landscape design.	**Consistent.** As discussed above, proposed buildings would include appropriate setbacks, height, and siting so as not to intrude upon views of surrounding mountain ridgelines from public vantage points. The Project site is not located within the viewshed to or from Lake Elsinore due to the natural topography and distance from the lake.
Policy 13.3: Require grading plans for any hillside development to include specifications for revegetation and new planting to minimize hillside scarring.	**Consistent.** As shown on Figure 2-5, Project landscaping would include planting of a variety of trees, shrubs, and succulents that would complement the surrounding natural landscaping. Trees would be planted to screen the Project from off-site locations. Additionally, the Project would not require the removal of any existing trees on the Project site. Further, the Project would include a restoration area adjacent to the Project site, which would restore and enhance vegetation to predeveloped natural vegetative conditions. Building 2 would require the cut of an adjacent slope and construction of a retaining wall with a maximum height of 46 feet along a portion of the southwest side of the building. Contour grading would be provided from the grading wall to the property line at a maximum slope of 2:1. The slopes would be landscaped with trees to stabilize the slope and reduce hillside scarring while also minimizing potential fuel in the event of wildfire.
Good Neighbor Policy[1]	
1. Siting and Design Provide for 1,000 feet minimum setback(s) from sensitive receptors or justification supporting a lesser separation, but in no case less than 300 feet of separation from an existing sensitive receptor to truck bays, loading docks, active truck operations areas, outdoor storage areas, or any buildings;	**Consistent**. Building 2 would be located within 1,000 feet of the nonconforming residence located at the southeast corner of the Onsite Development Area and the single-family residence located northwest along Pierce Street. The nonconforming residence is located on a parcel designed as Light Industrial (LI) in the City's General Plan and zoned General Manufacturing (M-2). As detailed in the Good Neighbor Policy, sensitive uses "located in Industrial zoning designations" are excluded from the "Good Neighbor Policy." The single-family residence located northwest along Pierce Street is a sensitive use under the Good Neighbor Policy. While the Building 2 truck court would face the opposite direction from the residence, ancillary truck parking would be within 300 feet of the residence. Activity in this parking area will be limited to parking and loading and unloading activities. Additionally, the property in question is currently vacant and is being marketed as an industrial redevelopment opportunity. Considering the characteristics of the property, no conflict with this standard would occur.

Table 3.1.F: Consistency Analysis

Standards	Project Consistency
4. Screening and landscaping Sites shall be fully screened with perimeter landscaping and masonry screening walls along all bordering streets and adjacent to the property lines of sensitive receptors. Perimeter screening shall measure a minimum of 15 feet in width and shall include, but not be limited to, a continuous vegetative screen of overstory trees that measure a minimum of 25 feet in height within ten (10) years of planting and a solid masonry wall of at least six (6) feet in height. Trees shall be provided at a ratio of one (1) 24" box tree per 20 linear feet. Developments located within a Very High Fire Hazard Severity Zone shall prepare a Fuel Modification Plan that includes, but not limited to, fire-resistive, native plant species in landscaping. Landscape plans in for developments located in a Very High Fire Hazard Severity Zone shall be reviewed by the City Fire Marshal.	**Consistent.** The proposed landscaping buffer would meet the requirements detailed in this standard. Landscape would be planted along the Project frontage and a landscaped. The parkway would be landscaped with a variety of shrubs, grasses, and groundcover and would include plantings of California juniper and scrub oak throughout the parkway easement and larger trees at corners. Near Building 1, smaller trees, shrubs, and groundcover would provide a buffer between employee parking areas and Baker Street. Landscape coverage on the parcel containing Building 1 would be approximately 26 percent, while landscape coverage for Building 2 would be approximately 32 percent. In addition, Building 2 would include a 14-foot-high screen wall lining the truck court, featuring 16-foot-high pilasters to add architectural interest and effectively mitigate its mass. In addition, as the Project site is located within a Very High Fire Hazard Severity Zone, a Fuel Modification Plan has been prepared that includes, but is not limited to, fire-resistive, native plant species in landscaping. The proposed landscape plans shall be reviewed by the City Fire Marshal. Therefore, the Project is consistent with this standard.
5. Building Façade Articulation Building planes visible from public view shall be articulated by changes in exterior building materials, color, decorative accents, and/or articulated features. Modulation and variation of building masses between adjacent buildings visible from public streets shall be provided. Pedestrian and ground-level building entries accessible to visitors should be designed using recessed entries, covered entries, projections, or roofs to provide shade and visual relief at a pedestrian scale.	**Consistent**. Public views of the proposed buildings from Baker Street, Pierce Street, and Nichols Road would be generally screened through on-site landscaping; however, any view of proposed building planes visible from these public streets would be articulated by changes in exterior building materials and color. The building exterior would consist of painted concrete in shades of cream and grey, aluminum canopies, and stone accents. The building exterior would contain green reflective-glazed windows dispersed along the building façade within cutouts of the concrete exterior. Pedestrians would primarily encounter on-site vegetation followed by screen walls, which would echo the building's color palette and offer visual interest through stone pilasters. In addition, office entries, distinguished by stone siding, recessed glass doors, and metal canopies, would guide visitors and employees, ensuring consistency with the overall design standard. Therefore, no conflict with this standard would occur.

Source: EPD Solutions, Inc., *Baker Street Warehouse Project Visual Impact Assessment,* Table 9 (February 2025).
Notes: Table 3.11.E provides a thorough analysis of the Project's consistency with the City's Good Neighbor Policy.

The nearest viewpoint to the Project would be from Baker Street. Baker Street is currently a publicly accessible dirt road, providing residential access, with minimal traffic and only one residence utilizing the section running along the northeast side of the proposed warehouse buildings. The Project includes the improvement of Baker Street, including the installation of sidewalk along the Project frontage and a landscaped 10-foot-wide parkway (within the SCE easement paralleling Baker Street). Baker Street would be elevated an average of 5 feet above its existing elevations along the proposed segment to support drainage conveyance and flood protection of public ROW, and the northeast

parkway of Baker Street would slope down to discharge to the northerly properties. The parkway would be landscaped with a variety of shrubs, grasses, and groundcover and would include plantings of California juniper and scrub oak throughout the parkway easement and larger trees at corners. Near Building 1, smaller trees, shrubs, and groundcover would provide a buffer between employee parking areas and Baker Street. Once past Building 1, a combined retaining/screen wall would shield truck parking areas from motorists and pedestrians traveling along Baker Street (see Figure 3.1-4, Baker Street Streetscape).

Figure 3.1-4: Baker Street Streetscape, View Southeast

As discussed above and detailed in Tables 3.1.D, 3.1.E., and 3.1.F, the proposed Project is generally consistent with the development standards for the M-2 Zoning District and the General Plan policies regarding aesthetics and scenic quality. Compliance with these standards and policies would be verified and required by the City during the development permitting process. As such, while the proposed Project would change the existing visual character of the site, the design of the Project and ancillary features, including walls, fencing, and landscaping, would be consistent with those common in industrial areas and would not conflict with applicable zoning and other regulations governing scenic quality. Therefore, potential impacts would be **less than significant,** and mitigation is not required.

Threshold 3.1.4: Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact with Mitigation Incorporated. The Project site is undeveloped and does not currently harbor any source of nighttime lighting. Nighttime lighting sources surrounding the site include vehicle illumination, streetlights, and lighting from nearby commercial and residential uses. Sensitive receptors relative to lighting and glare include motorists passing by the Project site and adjacent residents.

Construction. During Project construction, nighttime lighting may be used within the construction staging areas to provide security for construction equipment. Due to the distance between the construction area and the adjacent residences and motorists on adjacent roadways, such security lights may result in glare to residents and motorists. This potential impact would be reduced to a less than significant level through implementation of **MM AES-1,** which would require the temporary lighting to be downward facing and hooded.

Operation. Development of the Project would introduce new sources of light and glare into the area from street lighting, parking lot lighting, and outdoor and indoor building lighting. The Project site is currently undeveloped and is adjacent to other nonresidential developments along the I-15 corridor.

The building exterior predominantly would consist of painted concrete in shades of smooth cream and grey, aluminum canopies, and stone accents. The building exterior would contain green reflective-glazed windows dispersed along the building façade within cutouts of the concrete exterior but would not include large areas of reflective surfaces. Views of the proposed building would be most notable from I-15 and Nichols Road. The parkways along Baker Street would be landscaped with a variety of shrubs, grasses, and groundcover and would include plantings of California juniper and scrub oak throughout the parkway easement and larger trees at corners. Near Building 1, smaller trees, shrubs, and groundcover would provide a buffer between employee parking areas and Baker Street. California live oak, California sycamore, and a variety of other trees, shrubs, and groundcovers would provide similar screening within a 10-foot-wide parkway along Pierce Street. As such, Project landscaping would provide a screen between the proposed buildings and adjacent roadways during peak sunlight hours. During the City's permitting process, the City will verify that the Project implements City lighting requirements and landscape screening. The Project would not be visible from SR-74. The top of the proposed warehouse buildings, which would be visible from Ingall Circle, do not include the installation of reflective glass or solar panels that would result in glare onto adjacent properties.

The proposed Project would create limited new sources of light or glare from security and site lighting but would not adversely affect day or nighttime views in the area given that adherence to City standards related to the design, installation, and operation of outdoor lighting is a requirement for all development in the city. Section 17.112.040 (Lighting) of the City's Municipal Code requires that "outdoor lighting fixtures in excess of 60 watts shall be oriented and shielded to prevent direct illumination above the horizontal plane passing through the luminaire and prevent any glare or direct illumination on adjacent properties or streets." Site lighting would be directed downward and shielded to avoid unnecessary illumination of the night sky and minimize potential for significant light trespass onto adjacent property. Night lighting also shall be directed away from the MSHCP Conservation Area to protect species within the MSHCP Conservation Area from direct night lighting. The use of shields on exterior lighting fixtures would also minimize the potential for adjacent properties to receive or experience nuisance glare from site lighting sources. Section 17.148.110 (Lighting, Parking Requirements) requires that "Adequate parking lot lighting for security purposes shall be required and maintained to effectively illuminate the parking area of all developments, except for single-family and duplex dwellings. Lighting shall be located and designed so as to preclude the direct glare of light shining onto adjacent property,

streets, or into the sky above a horizontal plane passing through the luminaire." Parking lot lighting across the site would be selected and designed to preclude the direct glare of light shining onto adjacent property, streets, or into the sky above a horizontal plane passing through the luminaire.

The County of Riverside has adopted Ordinance 655, which limits the use of certain light fixtures that affect nighttime astronomical observations from the Mount Palomar Observatory. The Mount Palomar Observatory is approximately 37 miles southeast of the Project site, and the Project site is within the County-designated "Zone B" established under Ordinance 655.[21] Due to the proximity of the observatory, Section 17.112.040 of the City's Municipal Code further encourages the use of shielded, low-pressure sodium lighting in outdoor lighting fixtures.

As required and appropriate under the 2022 Building Energy Efficiency Standards, the Project may require the installation of solar photovoltaic (PV) technology prior to operation. The Project has been designed to be "solar ready." Since the concept of efficient solar power is to absorb as much light as possible, while reflecting as little light as possible, standard solar panels produce less glare and reflection than standard window glass.[22] On a more technical level, solar panels use "high-transmission, low-iron glass," which absorbs more light and produces less glare and reflectance than normal glass; therefore, glare and reflection from solar panels would not generate a significant amount of glare onto adjacent properties. Development of the proposed Project would result in a similarity of the lighting to that common in other urbanizing areas of the city. Adherence to the applicable and appropriate requirements of the City's Municipal Code would ensure that the Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area during occupancy of the Project; therefore, impacts would be less than significant, and mitigation is not required.

3.1.7 Level of Significance Prior to Mitigation

Impacts related to scenic vistas, scenic highways, visual character, and operational lighting during operation have been determined to be less than significant; therefore, no mitigation is required. As temporary but potentially significant lighting impacts may occur during Project construction, mitigation is required.

[21] Riverside County Ordinance 655 establishes two zones around the Mount Palomar Observatory that dictate the type of lighting that can be used in new development to reduce nighttime light pollution. Zone A is a circular area 15 miles in radius centered on the observatory, and Zone B is a circular area 45 miles in radius centered on the observatory (encompassing Zone A). Both zones provide lamp type and shielding requirements for lighting fixtures. The preferred source of lighting in these zones is shielded, low-pressure sodium lamps. Ordinance 655 further provides conditions for operation of various classes of lighting within areas under County of Riverside jurisdiction.

[22] Colton, Roger D., and Sheehan Fisher. 2014. *Assessing Rooftop Solar PV Glare in Dense Urban Residential Neighborhoods: Determining Whether and How Much of a Problem*. November. Website: http://www.fsconline.com/downloads/Papers/2014%2011%20Solar_Glare.pdf (accessed May 9, 2025).

3.1.8 Regulatory Compliance Measures and Mitigation Measures

The following mitigation measure is applicable to the proposed Project.

MM AES-1 Prior to issuance of grading permits, the Project developer shall provide evidence to the City of Lake Elsinore that any temporary nighttime lighting installed for security purposes shall be downward facing and hooded or shielded to prevent security light spillage by 1 foot candle to surrounding properties outside of the staging area or direct broadcast of security light into the sky.

3.1.9 Level of Significance after Mitigation

Implementation of **MM AES-1** would ensure the temporary security lighting required during Project construction would be sufficiently shielded and directed to avoid spillage onto surrounding properties and into nighttime skies, thereby reducing this temporary impact to a less than significant level.

3.1.10 Cumulative Impacts

The cumulative impact area for aesthetic resources is the City of Lake Elsinore because the City is responsible for creating guidelines relating to aesthetics and visual resources in the city and approving development within the city. Cumulative impacts would occur if the effects of the Project and cumulative development in the city resulted in impacts to: designated scenic vistas in or in the vicinity of the city; surrounding views; would affect the existing visual character or adjacent land uses as seen from public locations; or result in aesthetic changes inconsistent with the General Plan policies.

The proposed Project includes extensive development, design, and landscape guidelines that are generally consistent with the City General Plan policies and applicable provisions of the City's Municipal Code; therefore, the impacts of the Project relative to scenic vistas, scenic highways, visual character, and operational lighting have been determined to be less than significant. Construction-related lighting impacts would be short-term and mitigated through implementation of **MM AES-1**, which requires that site security lighting be oriented downward and appropriately shielded.

The City's General Plan EIR recognizes that development activity in the city will result in changes to the visual character throughout the city resulting from modification of existing vegetation and topography. Upon implementation of City standards and conformance with General Plan policies, the City's General Plan EIR did not identify significant impacts relative to scenic highways, changes in visual quality, or lighting. Citywide, impacts related to scenic vistas were addressed in the General Plan EIR through a requirement that future projects prepare visual simulations detailing compliance with applicable General Plan Policies.[23] Such an assessment has been prepared for the Project. As previously stated, the proposed warehouse uses are consistent with the uses envisioned in the City's

[23] General Plan EIR Mitigation Measure Aesthetics 1 states, "Future development projects will be required to prepare visual simulations demonstrating compliance with the applicable GPU goals and policies. Preparation of visual simulations demonstrating compliance with the GPU goals and policies would be required for future development projects located in scenic viewsheds along the I-15 corridor and other areas at the discretion of the Director of Community Development."

General Plan M-1 land use designation[24] for the site. Additionally, as noted in Table 3.1.E, the Project is consistent with applicable General Plan policies. As addressed in this section, when compared against the existing condition, the Project would not have a significant impact on scenic vistas.

It is reasonable to anticipate that any cumulative or subsequent development in the city would adhere to the applicable General Plan, zoning, and specific plan regulations and development standards, including those related to the design and orientation of buildings, amenities, landscaping, signage, and lighting, which would ensure the specific aesthetic impacts from individual projects are appropriately addressed, thereby ensuring **no cumulative considerable or significant impact** relative to the scenic vistas, scenic resources, visual quality, or lighting would occur.

[24] The M-1 land use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses." City of Lake Elsinore. 2011. *General Plan Environmental Impact Report*, Section 2.0. December.

3.2 AGRICULTURE AND FORESTRY RESOURCES

This section of the Draft Environmental Impact Report (EIR) discusses the existing setting of agriculture and forestry resources at the Project site and within the city of Lake Elsinore, sets forth the relevant regulatory requirements that apply to the analysis of the proposed Project's potential impact on agriculture and forestry resources, and evaluates the potential for implementation of the proposed Project to impact agriculture and forestry resources. This section is based in part on information provided by the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP), the United States Department of Agriculture (USDA), the California Department of Forestry and Fire Protection (CAL FIRE), the Natural Resources Conservation Service (NRCS), the County of Riverside (County) Agricultural Commissioner's Office, the County's General Plan, the City of Lake Elsinore (City) General Plan, and the City's General Plan EIR.

3.2.1 Scoping Process

Potential impacts to agriculture and forestry resources were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received no comments in response to the Notice of Preparation (NOP), which was circulated between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to agriculture and forestry resources. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this EIR.

3.2.2 Methodology

Impacts to agriculture and forestry resources were assessed based on documents and maps from the DOC, the County of Riverside Agricultural Commissioner's Office, the County of Riverside General Plan, and the City of Lake Elsinore's General Plan and General Plan EIR.

Pursuant to the DOC FMMP, all lands within California are classified into one of seven map categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land. A description of each FMMP category is provided in Section 3.2.4. The California Environmental Quality Act (CEQA) (Public Resources Code [PRC] Sections 21095 and 21060.1(a)) and the *State CEQA Guidelines,* Appendix G, define three of the FMMP Farmland categories—Prime Farmland, Unique Farmland, and Farmland of Statewide Importance—as agricultural lands for purposes of CEQA analysis and acknowledge that their conversion to nonagricultural uses may be considered a significant impact. In accordance with *State CEQA Guidelines* Appendix G, impacts to agricultural resources were evaluated for the proposed Project's potential to convert Important Farmland (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) to nonagricultural uses.

The proposed Project's potential to convert or accelerate deterioration of forestry resources was considered to determine potential impacts to forestry resources. The *California's Forests and Rangelands 2017 Assessment* produced as part of CAL FIRE's Fire and Resource Assessment Program, defines forest/forests as a "biological community of plants and animals that is dominated by tree and other wood plants; by definition in the Assessment, all lands with greater than 10 percent tree canopy cover including all California Wildlife Habitat Relationships types in the Conifer Forest, Conifer

Woodland, Hardwood Forest and Hardwood Woodland land cover classes."[1] The California PRC defines forest land as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[2] This information was used in this chapter of the Draft EIR to assess potential impacts to forestry resources on the Project site.

Potential agriculture and forestry resources impacts that can result from Project-related activities were evaluated qualitatively based on Project conditions, expected construction practices, locations, duration of construction, and operational activities.

3.2.3 Existing Environmental Setting

The proposed Project is located in Lake Elsinore, Riverside County, California. This section discusses the status of agricultural and forestry resources within Riverside County, Lake Elsinore, and the Project site.

The 140.04-acre Project site consists of four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings an associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities, and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

3.2.3.1 Riverside County

Agricultural Resources. Agricultural land use in Riverside County is an important economic and historic uses. The Agricultural (AG) land use designation was established by the County of Riverside to help conserve productive agricultural lands within the county. These include lands occupied by row crops, nurseries, citrus groves and vineyards, dairies, ranches, poultry and hog farms, and other agricultural uses. Residential density is permitted on parcels designated as Agricultural land uses at one dwelling unit per parcel provided that the parcel is 10 acres in size or larger.

In 2022, the gross value of agricultural production in the county was approximately $1.5 billion ($1,490,459,000), which represents an increase of $84 million (6 percent) compared to 2021.[3] The largest increase (19 percent) occurred in nursery production, followed by an 18 percent increase in field and seed production. Tree and vine crops had a 4 percent decrease in value during 2022 when

1 California Department of Forestry and Fire Protection (CAL FIRE). 2017. *Fire and Resource Assessment Program, California's Forests and Rangelands 2017 Assessment,* Page 286. Website: https://frap.fire.ca.gov/media/4babn5pw/assessment2017.pdf (accessed July 11, 2024).

2 California Public Resources Code, Section 12220(g).

3 County of Riverside Agricultural Commissioner's Office. n.d. *Riverside County Agricultural Production Report 2022*. Page 3 of pdf. Website: https://rivcoawm.org/sites/g/files/aldnop221/files/2023-11/2022%20Crop%20Report.pdf (accessed July 11, 2024).

compared to 2021. Using historical economic values, the total agricultural contribution to Riverside County's economy is approximately $3.9 billion.[4]

Table 3.2.A: Riverside County Agricultural Production Value, 2021 vs. 2022 shows the value of agricultural production in 2021 versus 2022 and provides a percent change between these years in Riverside County.

Overall, tree and vine crops had the highest (and only) drop in value (3.6 percent) between 2021 and 2022. Nursery (19.1 percent), field and seed (18.1 percent), and aquaculture (18.0 percent) had the highest increase in value between 2021 and 2022.

Table 3.2.A: Riverside County Agricultural Production Value, 2021 vs. 2022

Agricultural Category	2022 Value	2021 Value	Value Change	Percent Change
Citrus	$132,062,000	$127,473,000	$4,589,000	3.6%
Tree and Vine	$270,078,000	$280,105,000	($10,027,000)	(3.6%)
Vegetable	$328,236,000	$324,895,000	$3,341,000	1.0%
Field and Seed	$159,419,000	$135,033,000	$24,386,000	18.1%
Nursery	$318,683,000	$267,547,000	$51,136,000	19.1%
Apiculture	$5,950,000	$595,000	$25,000	0.4%
Aquaculture	$5,749,000	$4,873,000	$876,000	18.0%
Livestock and Poultry	$270,282,000	$260,059,000	$10,223,000	3.9%
Total	**$1,490,459,000**	**$1,405,910,000**	**$84,549,000**	**6.0%**

Source: County of Riverside Agricultural Commissioner's Office. 2022. *Riverside County Annual Crop Report 2022.* Page 6 of pdf. Website: https://rivcoawm.org/sites/g/files/aldnop221/files/2023-11/2022%20Crop%20Report.pdf (accessed July 11, 2024).

The most recent agricultural land conversion data available for Riverside County are for the 2016–2018 period and were obtained through the DOC FMMP.[5] Land converted in this period is shown in Table 3.2.B: Riverside County Agricultural Land Conversion, 2016–2018. In summary, for the 2-year period from 2016 to 2018, the total amount of Important Farmland (Prime Farmland, Farmland of Statewide Importance, and Unique Farmland) inventoried decreased by 1,152 acres, and the total amount of agricultural land that was inventoried in the county decreased by 6,325 acres.

[4] County of Riverside Agricultural Commissioner's Office. n.d. *Riverside County Agricultural Production Report 2022*. Page 3 of pdf. Website: https://rivcoawm.org/sites/g/files/aldnop221/files/2023-11/2022%20Crop%20Report.pdf (accessed July 11, 2024).

[5] California Department of Conservation, Division of Land Resource Protection. Table A-25 Riverside County 2016–2018 Land Use Conversion, https://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx. Accessed July 11, 2024.

Table 3.2.B: Riverside County Agricultural Land Conversion, 2016–2018

Land Use Category	Total Acreage Inventoried		2016–2018 Acreage Changes
	2016	2018	Net Acreage Changed
Prime Farmland	117,486	116,926	<560>
Farmland of Statewide Importance	43,757	43,610	<147>
Unique Farmland	32,566	32,121	<445>
Farmland of Local Importance	226,029	221,201	<4,828>
Important Farmland Subtotal	**419,838**	**413,858**	**<5,980>**
Grazing Land	110,202	109,857	<345>
Agricultural Land Subtotal	**530,040**	**523,715**	**<6,325>**
Urban and Built-Up Land	334,445	342,584	8,139
Other Land	1,017,634	1,020,057	2,423
Water Areas	62,361	58,124	<4,237>
Total Area Inventoried	**1,944,480**	**1,944,480**	**0**

Source: California Department of Conservation, Division of Land Resource Protection. Table A-25, Riverside County 2016–2018 Land Use Conversion. Website: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx (accessed July 11, 2024).

Forestry Resources. The Cleveland National Forest and San Bernardino National Forest, which are part of the Santa Ana Mountains and the San Bernardino and San Jacinto mountains, respectively, are the only forested land within Riverside County. At lower elevations in Riverside County, these forests are commonly bordered by mixed evergreen forest, oak woodlands, and chaparral. The County designates forest land within its boundaries as the following: High Coniferous Forests, Coniferous Forests, Montane Forests, Lowland Forests/Woodlands, and Desert Woodlands.[6]

3.2.3.2 City of Lake Elsinore

Agricultural Resources. According to the City of Lake Elsinore General Plan EIR, agricultural production was once a major land use and economic activity in the surrounding area, but the urban development within and surrounding the city in past decades has removed such land from crop cultivation and livestock raising in favor of residential development and urban commercial/industrial uses. Within the city boundaries, approximately 102 of the 24,814 acres are used for agriculture. Some of this existing agricultural land, as well as vacant land used for purposes other than agriculture, is designated by the DOC FMMP as Farmland of Local Importance (554 acres within the city), Grazing Land (827 acres within the city), and Unique Farmland (25 acres within the city). Remaining land is considered Urban/Built-Up Land or Other Land, reflecting that its developed uses or other characteristics make it unsuitable for agriculture. However, none of the farmland designations applied to land within the city are considered "Important Farmland" by the State of California.[7] Further, according to the City's General Plan EIR, there are no Williamson Act agricultural preserves located within the city boundaries.[8]

6 County of Riverside. 2015. County of Riverside General Plan. Chapter 5, Multipurpose Open Space Element. Figure OS-3a, Forestry Resources, Western Riverside County Parks, Forests, and Recreation Areas. December 8.

7 City of Lake Elsinore. 2011. General Plan Update Draft Program EIR, Section 3.1 – Land Use and Planning. August. Certified December 2011.

8 Ibid.

Forestry Resources. The City of Lake Elsinore does not have any areas designated in its General Plan as forest land or timberland for production or resource management.

3.2.3.3 Project Site

Agricultural Resources. The 140.04-acre Project site is irregular in shape and generally bounded by undeveloped land in all directions. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located fewer than 50 feet outside of and directly adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a residence are located fewer than 100 feet outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses are outside of the Project site limits. The Project site has a history of limited agriculture use from as early as 1938 to around 1962; however, no agricultural uses currently exist on the site.[9]

As early as 1938 to circa 1962, the Project site was a rural residential property with limited agriculture activity. From 1963 to present, the Project site has had minimal to no agricultural use.[10] The DOC FMMP[11] designates the majority of the Project site as "Farmland of Local Importance." Portions of the Project site along the southwestern Project site boundary are designated as "Other Land," and the northeastern most portion of Nichols Roads within the Offsite Improvements Area is designated as "Urban and Built-Up Land." Farmland of Local Importance is defined by the DOC as land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. According to the County of Riverside's General Plan, Farmland of Local Importance in Riverside County includes the following:[12]

- Soils that would be classified as Prime Farmland or Farmland of Statewide Importance but lack available irrigation water.
- Lands planted in 1980 or 1981 in dryland grain crops, including barley, oats, and wheat.
- Lands producing crops that are major for Riverside County but not listed as Unique Farmland crops. These crops are identified as returning $1 million or more on the 1980 Riverside County Agriculture Crop Report: permanent irrigated pasture, summer squash, okra, eggplant, radishes, and watermelons.

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9 EnviroApplications, Inc. 2023. *Phase 1 Environmental Ste Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530.* August 4.

10 EnviroApplications, Inc. 2023. *Phase 1 Environmental Ste Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530.* August 4.

11 California Department of Conservation (DOC). California Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/app/ (accessed July 11, 2024).

12 County of Riverside. 2015. County of Riverside General Plan, Chapter 5, Multipurpose Open Space Element. December 8.

- Dairylands, including corrals, pastures, milking facilities, and hay and manure storage areas if accompanied by permanent pasture or hayland of 10 acres or more.

- Lands identified by a city or County ordinance as Agricultural Zones or Contracts, which includes Riverside City "Proposition R" lands.[13]

- Lands planted with jojoba that are under cultivation and of producing age.

Figure 3.2-1: Farmland Classifications depicts areas of the Project site designated as "Farmland of Local Importance," "Other Land," and "Urban and Built-Up Land" and provides the farmland classifications in the vicinity of the Project site. The Project site is not under a Williamson Act contract, as there are no active Williamson Act contracts in the city.[14]

Forestry Resources. The 140.04-acre Project site consists of undeveloped land (Onsite Development Area, Restoration Area, and Construction/Improvements Buffer) and public road ROWs (Offsite Improvements Area). Vegetation on the Project site consists of species that are characteristic of the Coastal Sagebrush community, including California sagebrush, buckwheat, black sage, white sage, lilac, datura, and chollas, as well as introduced weeds and landscaping plants such as tumbleweed and eucalyptus. Consistent with the rest of the city, the Project site does not have any areas designated as forest land or timberland for production or resource management.

3.2.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.2.4.1 Federal Policies and Regulations

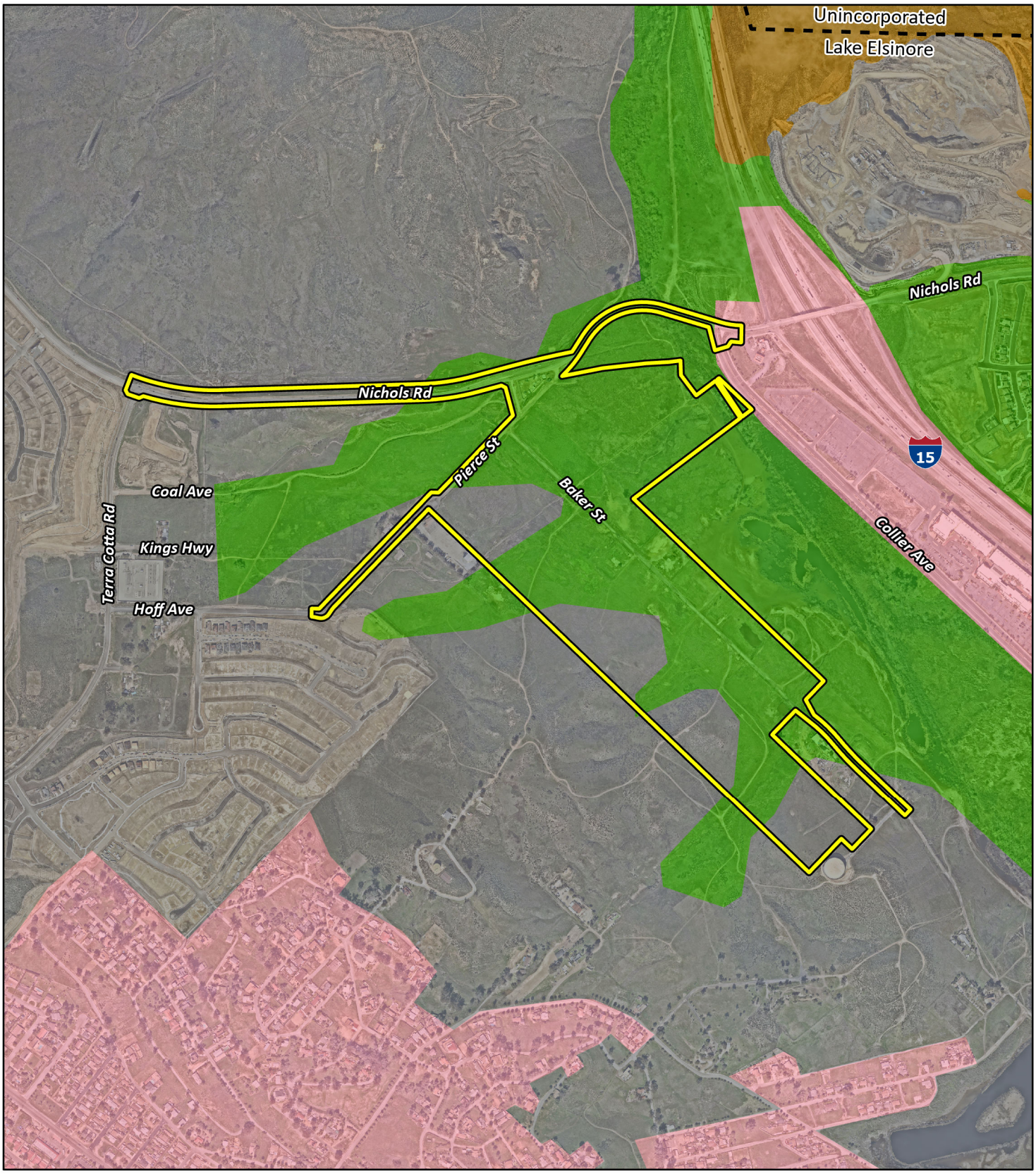
The Project site is privately owned; as such, federal regulations regarding agricultural and forestry resources do not apply to the Project site.

3.2.4.2 State Policies and Regulations

California Department of Conservation Farmland Mapping and Monitoring Program. Pursuant to Government Code Section 65570, the DOC FMMP compiles consistent, timely, and accurate data to decision makers for use in planning for the present and future of California's agricultural land resources. The FMMP provides maps and statistical data to the public, academia, and local, State,

[13] In 1979, Riverside voters approved Proposition R: "Taxpayer's Initiative to Reduce Costly Urban Sprawl by Preserving Riverside's Citrus and Agricultural lands, Its Unique Hills, Arroyos and Victoria Avenue." The two main components of Proposition R were the preservation of agriculture through application of the RA-5 Residential Agricultural Zone to two specific areas of the city, and the protection of hillside areas through application of the RC-Residential Conservation Zone to areas of the city based on slopes over 15 percent. Source: City of Riverside. 2012. Riverside General Plan 2025, Open Space and Conservation Element. Website: https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/12_Open_Space_and_Conservation_Element.pdf (accessed August 18, 2025).

[14] City of Lake Elsinore. 2011. General Plan Update Draft Program EIR, Section 3.1 – Land Use and Planning. August. Certified December 2011.



LSA

Project Site

City Boundary

Farmland Classifications

Grazing Land

Farmland of Local Importance

Other Land

Urban and Built-Up Land

0 500 1000

FEET

SOURCE: Nearmap (3/2024)

FIGURE 3.2-1

Baker Street Warehouse Project

Farmland Classifications

I:\2024\20241799\GIS\Pro\Baker Street Industrial Project\Baker Street Industrial Project.aprx (1/27/2025)

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and federal governments on the nature, location, and extent of farmland, grazing land, and urban built-up areas in the State to assist in making informed decisions for the best utilization of California's farmland. Government Code Section 65570 mandates the FMMP to biennially report to the Legislature on the conversion of farmland and grazing land and to provide maps and data to local governments and the public. The FMMP also prepares and maintains an automated map and database system to record and report changes in the use of agricultural lands. These maps combine soil survey and current land use information from the USDA and NRCS to provide an inventory of agricultural resources in each county. The maps show urbanized lands and a qualitative sequence of agricultural designations. Pursuant to the FMMP, all lands within California are classified into one of seven map categories. The minimum mapping unit is 10 acres, except as otherwise noted.[15]

Provided below is a description of the various map categories established by the FMMP, assessing the importance of agricultural land based on factors such as soil characteristics, climate, and water supply:

- **Prime Farmland:** The best combination of physical and chemical features and able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

- **Farmland of Statewide Importance:** Similar to Prime Farmland but with minor shortcomings, such as steeper slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date.

- **Unique Farmland:** Lesser-quality soils used for the production of the State's leading agricultural crops. This land is usually irrigated but may include unirrigated orchards or vineyards. Land must have been cultivated at some time during the 4 years prior to the mapping date.

- **Farmland of Local Importance:** Land of importance to the local economy, as defined by each county's local advisory committee and adopted by its board of supervisors. This refers to all farmable lands in the county that do not meet the definitions of Prime, Statewide, or Unique. This includes land that is or has been used for irrigated pasture, dryland farming, confined livestock and dairy, poultry facilities, aquaculture, and grazing land.

- **Grazing Land:** This type of land is occupied with vegetation suited to grazing livestock. This category was developed in cooperation with the California Cattleman's Association, the University of California Cooperative Extension, and other groups interested in the extent of grazing activities. The minimum mapping unit is 40 acres.

- **Urban and Built-Up Land:** This type of land is occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. Common examples of land uses include residential, industrial, commercial, and institutional facilities; public

[15] California Department of Conservation (DOC). *A Guide to the Farmland Mapping and Monitoring Program*. 2004. Page 6. Website: https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/Archive/fmmp_guide_2004.pdf (accessed July 11, 2024).

administrative purposes; railroad and transportation yards; cemeteries; airports; golf courses; sanitary landfills; sewage treatment; and water control structures; and other developed purposes.

- **Other Land:** This type of land is not included in any other mapping category. Common examples include low-density rural developments; brush, timber wetland, and riparian area not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development that is greater than 40 acres is mapped as Other Land.

Williamson Act and Farmland Security Act. The California Land Conservation Act of 1965 (CLCA), better known as the Williamson Act (California Government Code §51200 et. seq.), enables local governments to enter into contracts with private landowners for the purpose of restricting specific parcels of land to agricultural or related open space use. In return, landowners receive property tax assessments that are much lower than normal because they are based on farming and open space uses as opposed to full market value. Pursuant to Government Code § 51230, counties and cities may establish Agricultural Preserves, which define boundaries of those areas within which the city or county will be willing to enter into contracts pursuant to the CLCA. Contracts made pursuant to the CLCA only are allowed for areas within established Agricultural Preserves. Williamson Act contracts have a minimum term of 10 years, with renewal occurring automatically each year, although local governments can establish initial contract terms for longer periods of time. Only land located within an Agricultural Preserve is eligible for a Williamson Act contract. The boundary is designated by resolution of the board of supervisors or city council having jurisdiction. Agricultural Preserves generally must be at least 100 acres in size; however, a city or county may allow for lesser acreage if a finding is made that the characteristics of the agricultural enterprises in the area are unique and that the establishment of preserves of less than 100 acres is consistent with the general plan of the county or city. The rules of each Agricultural Preserve specify the uses allowed. Land uses within an Agricultural Preserve must be open space or agricultural in nature or other such uses that are not incompatible with agricultural uses as identified by the local government for the duration of the contract. The contracts run with the land and are binding on all successors in interest of the landowner.

In return for entering into a contract, the landowner is granted preferential taxes that are based on agricultural and related land uses rather than fair market value. Contracts may be exited at the option of the landowner or local government by initiating the process of term nonrenewal. Under this process, the remaining contract term (9 years in the case of an original term of 10 years) is allowed to lapse, with the contract null and void at the end of the term. During the nonrenewal process, the annual tax assessment continually increases each year until it is equivalent to current tax rates at the end of the nonrenewal period. Under a set of specifically defined circumstances, a contract may be cancelled without completing the process of term nonrenewal. Contract cancellation, however, involves a comprehensive review and approval process, as well as the payment of a fee by the landowner.

In August 1998, Senate Bill (SB) 1182 established the Farmland Security Zone (FSZ) provisions of the Williamson Act. An FSZ is created within an Agricultural Preserve by County Board of Supervisors approval and at the request of a landowner or group of landowners. FSZ contracts offer landowners

greater property tax reductions in return for an initial contract term of 20 years, with renewal occurring automatically each year. Land restricted by an FSZ contract is valued for property assessment purposes at 65 percent of its Williamson Act valuation, or 65 percent of its Proposition 13[16] valuation, whichever is lower. New special taxes for urban-related services must be levied at an unspecified reduced rate unless the tax directly benefits the land or living improvements. Cities and special districts that provide nonagricultural services are generally prohibited from annexing land enrolled under an FSZ contract. Similarly, school districts are prohibited from taking FSZ lands for school facilities.

Z'Berg-Nejedly Forest Practice Act. The Z'Berg-Nejedly Forest Practice Act (Forest Practice Act) (PRC §4511 et. seq.) identifies operating methods and procedures that seek to protect fish, wildlife, forests, and streams within timber harvesting areas. The Forest Practice Act is intended to achieve "maximum sustained production of high-quality timber products…while giving consideration to values relating to recreation, watershed, wildlife, range and forage, fisheries, regional economic vitality, employment and aesthetic enjoyment."[17] The regulations created by the Forest Practice Act define factors such as the size and location of harvest areas, include measures to prevent unreasonable damage to residual trees, and address the protection of riparian areas, water courses and lakes, wildlife, and habitat areas.

Z'Berg-Warren-Keene-Collier Forest Taxation Reform Act. According to the Z'Berg-Warren-Keene-Collier Forest Taxation Reform Act[18] (California Government Code §51110.1 et. seq.) enacted in 1976, counties must provide for the zoning of land used for growing and harvesting timber as Timberland Production Zones (TPZs). TPZs were established to preserve and protect timberland from conversion to other uses and avoid land use conflicts.

Timberland Productivity Act. The Timberland Productivity Act (California Government Code §51100 et. seq.) represents the Legislature's declared intent "to fully realize the productive potential of the forest resources and timberlands of the state." The act imposes mandatory restrictions on parcels zoned for timberland production. Such parcels "shall be zoned so as to restrict their use to growing and harvesting timber and to compatible uses."[19] In exchange, property owners are required to pay property taxes on the land based solely on its value for timber harvest, and not for its development potential. Government Code Section 51104(g) of the Timberland Productivity Act defines "timberland production zone" as an area that has been zoned pursuant to Government Code Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses. Compatible uses are defined under Government Code Section 51104(h) and include management for watersheds; management of habitat for hunting and fishing; access roads and staging areas for timber harvesting; gas, electric,

16 Proposition 13, passed in 1978, changed tax assessment practices by limiting valuations to a static base year. Source: California Department of Conservation. Williamson Act Program Overview. Website: https://www.conservation.ca.gov/dlrp/wa/Pages/wa_overview.aspx (accessed August 18, 2025).

17 Public Resources Code § 4513[b].

18 California Government Code §§ 51110–51119.5: Article 2.

19 California Government Code § 51115.

water, or communication transmission facilities; grazing; or a residence or other structure necessary for timber management.

3.2.4.3 Regional Policies and Regulations

County of Riverside Right-to-Farm Ordinance (Ordinance No. 625.1). The Right-to-Farm Ordinance (Riverside County Code of Ordinances §5.40.010 et. seq.) conserves, protects, and encourages the development, improvement, and continued viability of agricultural land and industries for the long-term production of food and other agricultural products, and for the economic well-being of the county's residents. The Right-to-Farm Ordinance also attempts to balance the rights of farmers to produce food and other agricultural products with the rights of nonfarmers who own, occupy, or use land within or adjacent to agricultural areas. It is the intent of this ordinance to reduce the loss to the County of its agricultural resources by limiting the circumstances under which agricultural operations may be deemed to constitute a nuisance. Prospective buyers of property adjacent to agricultural land shall be notified through the title report that they could be subject to inconvenience or discomfort resulting from accepted farming activities per provisions of the County's Right-to-Farm Ordinance.

3.2.4.4 Local Policies and Regulations

County of Riverside General Plan, Chapter 3.0, Land Use Element. The Land Use Element of the County's General Plan guides the County's overall pattern of development, including the general distribution, general location, and extent of land uses within Riverside County. The County's General Plan Land Use Element contains the following goals and policies related to the conservation of agricultural resources are applicable to the proposed Project:

- **LU Policy 7.4:** Retain and enhance the integrity of existing residential, employment, agricultural, and open space areas by protecting them from encroachment of land uses that would result in impacts from noise, noxious fumes, glare, shadowing, and traffic.

- **LU Policy 20.1:** Encourage retaining agriculturally designated lands where agricultural activity can be sustained at an operational scale, where it accommodates lifestyle choice, and in locations where impacts to and from potentially incompatible uses, such as residential uses, are minimized, through incentives such as tax credits.

- **LU Policy 20.2:** Protect agricultural uses, including those with industrial characteristics (dairies, poultry, hog farms, etc.) by discouraging inappropriate land division in the immediate proximity and allowing only uses and intensities that are compatible with agricultural uses.

- **LU Policy 20.4:** Encourage conservation of productive agricultural lands. Preserve prime agricultural lands for high-value crop production.

- **LU Policy 20.5:** Continue to participate in the California Land Conservation Act (the Williamson Act) of 1965.

- **LU Policy 20.7:** Adhere to Riverside County's Right-to-Farm Ordinance.

City of Lake Elsinore General Plan, Chapter 4.0. Chapter 4.0 of the City of Lake Elsinore General Plan describes existing agricultural resources in the city. No goals or policies related to the conservation of agricultural resources are provided in the City's General Plan.

3.2.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed Project could have a significant adverse impact with respect to agricultural or forestry resources if it would:

Threshold 3.2.1: 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,

Threshold 3.2.2: Conflict with existing zoning for agricultural use, or a Williamson Act contract,

Threshold 3.2.3: 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)),

Threshold 3.2.4: Result in the loss of forest land or conversion of forest land to non-forest use, or

Threshold 3.2.5: Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

3.2.6 Project Impacts

Threshold 3.2.1: **Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

No Impact. CEQA (PRC §§ 21095 and 21060.1(a)) and *State CEQA Guidelines* Appendix G define three of the FMMP's Farmland categories—Prime Farmland, Unique Farmland, and Farmland of Statewide Importance—as agricultural lands for purposes of CEQA analysis and acknowledge that their conversion to nonagricultural uses may be considered a significant impact. The DOC FMMP was reviewed to determine if the Project site is designated as Important Farmland (i.e., Prime Farmland, Unique Farmland, or Farmland of Statewide Importance). The FMMP indicates the majority of the Project site is designated as Farmland of Local Importance, with portions along the southwestern boundary designated as Other Land and the northeastern most portion of Nichols Road designated as Urban and Built-Up Land (see Figure 3.2-1). Farmland of Local Importance is not considered Important Farmland pursuant to Appendix G of the *State CEQA Guidelines*. Therefore, the conversion of Farmland of Local Importance to non-agricultural uses is not considered a

significant impact to agricultural lands. In addition, the Project site is not currently or recently used for agricultural production. Further, the General Plan designates the Project site as Limited Industrial and Floodway, which allows for industrial, warehouse, manufacturing, research and development, and other similar compatible uses. As such, even though the portions of the Project site are designated by the DOC as Farmland of Local Importance, the City does not envision any agricultural uses at the Project site.

No Prime Farmland, Farmland of Statewide Importance, or Unique Farmland are classified on the Project site; therefore, implementation of the proposed Project would not convert Important Farmland to nonagricultural uses. **No impact would occur.**

Threshold 3.2.2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Project site has zoning designations of Limited Manufacturing (M-1), General Manufacturing (M-2), and Open Space/Floodway (OS). The Project site is not zoned for agricultural use. The intent of the M-1 zoning district is to reserve appropriate locations for certain categories of light industrial uses that are relatively free of nuisance or hazardous characteristics,[20] and the intent of the M-2 zoning district is to reserve appropriate locations for a full range of industrial, manufacturing, and related establishments in order to strengthen the City's economic base and increase employment opportunities.[21] Neither the M-1 zone nor the M-2 zone permits agriculture production.[22] The OS zoning district identifies areas of the city that are not suited for residential or other intensive use for the reason that they may endanger the health, safety, and welfare of persons due to flooding, fire, or erosion, as well as those areas designated to allow citizens to pursue recreational activities. In the OS district, agricultural uses are permitted provided an agreement between the City and the land owner can be made that will allow the land owner to operate under the CLCA.[23]

The Project site is not under a Williamson Act contract, as there are no active Williamson Act contracts in the city.[24] The proposed Project would include a zone change to amend the zoning of the M-1 portion of the site to M-2 for zoning consistency. Implementation of the proposed Project would develop the Project site with warehouse uses, consistent with the M-2 zoning district. Implementation of the proposed Project would therefore not conflict with existing zoning for agricultural use or conflict with a Williamson Act contract. **No impact would occur.**

[20] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.136: M-1 Limited Manufacturing District.

[21] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.140: M-2 General Manufacturing District.

[22] Ibid.

[23] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.100: (OS) Open Space District.

[24] City of Lake Elsinore. 2011. General Plan Update Draft Program EIR, Section 3.1 – Land Use and Planning. August. Certified December 2011.

Threshold 3.2.3: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

No Impact. As discussed above, the Project site is zoned M-1, M-2, and OS, and is not zoned as forest land, timberland, or timberland production. The proposed Project would include a zone change to amend the zoning of the M-1 portion of the site to M-2 for zoning consistency. Implementation of the proposed Project would develop the Project site with warehouse uses, consistent with the M-2 zoning district, which does not conflict with zoning for forest land or timberland. Additionally, none of the surrounding land uses are zoned forest land, timberland, or timberland production. Therefore, there is no potential for the proposed Project to conflict with existing zoning for forest land or land zoned for timberland production. **No impact would occur.**

Threshold 3.2.4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As detailed previously, the Project site and adjacent lands are not occupied by forest resources. As such, implementation of the proposed Project would not result in the loss of forest land or conversion of forest land to nonforest use. **No impact would occur.**

Threshold 3.2.5: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The Project site is not currently or recently used for farmland or agricultural production; thus, no farmland or agricultural land under use would be converted. In addition, Important "Farmland" is defined in Section II (a) of Appendix G of the *State CEQA Guidelines* as "Prime Farmland," "Unique Farmland," or "Farmland of Statewide Importance." As discussed above in the response to Threshold 3.2.1, Important Farmland is not present on the Project site. The proposed Project would convert land that is largely undeveloped and designated as Farmland of Local Importance to developed uses. The conversion of Farmland of Local Importance is not considered a significant impact to agricultural land in accordance with Appendix G of the *State CEQA Guidelines*.

There are no forest or timberland resources on, or in the vicinity of, the Project site. Therefore, implementation of the proposed Project would not contribute or catalyze the conversion of forest land to nonforest use.

Overall, implementation of the proposed Project would not involve other changes in the existing environment that could result in the conversion of farmland to nonagricultural use, or conversion of forest land to nonforest use. **No impact would occur.**

3.2.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts related to agricultural and forestry resources.

3.2.8 Compliance Measures and Mitigation Measures

No compliance measures are applicable to the proposed Project.

3.2.9 Level of Significance after Mitigation

The proposed Project would not result in any significant adverse impacts related to agricultural or forestry resources, and no mitigation would be required.

3.2.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for agriculture and forestry. The cumulative impact area for agriculture and forestry is the city of Lake Elsinore. Neither the Project site nor any of the surrounding land uses contain Important Farmland (Prime Farmland, Unique Farmland, and Farmland of Statewide Importance) or are zoned for agricultural use, forest land, timberland, or timberland production.

Implementation of the proposed Project would result in the conversion of Farmland of Local Importance to non-agricultural (warehouse) uses. However, Farmland of Local Importance is not considered Important Farmland pursuant to Appendix G of the *State CEQA Guidelines*. Therefore, the conversion of Farmland of Local Importance to non-agricultural uses is not considered a significant impact to agricultural lands. In addition, the Project site and surrounding areas are not currently used for agriculture. Other future discretionary projects in the city are required to undergo environmental review pursuant to CEQA and would be required to identify appropriate mitigation measures to reduce significant impacts to agricultural resources. Therefore, the proposed Project's impacts pertaining to agricultural land would be less than cumulatively considerable.

The City has no Williamson Act contract lands. Therefore, there are no Williamson Act contract lands associated with other past, current, and probable future projects in the city of Lake Elsinore. Furthermore, the Project site is not under a Williamson Act contract. Therefore, the Project would not result in cumulatively considerable impacts related to Williamson Act contract lands.

The Project site and other areas within the city are not zoned for forest land or timberland, nor are they occupied by forest land resources. As such, implementation of the proposed Project in addition to future projects would not result in rezoning from forest land or timberland to nonforest land or non-timberland zoning, nor would reduction of forest land resources occur. Therefore, when considered in conjunction with past, present, and probable future projects, impacts pertaining to forest land and timberland would not be cumulatively considerable.

3.3 AIR QUALITY

This section has been prepared for the proposed Baker Street Warehouse Project (proposed Project) using methodologies and assumptions recommended in the air quality impact assessment guidelines of the South Coast Air Quality Management District (SCAQMD) in its *California Environmental Quality Act (CEQA) Air Quality Handbook*[1] and associated updates. In keeping with these guidelines, this section describes existing air quality and evaluates short-term impacts during construction, long-term emissions associated with operation, and how potential impacts correlate to human health. The analysis in this section is based on the findings of the *Baker Lake Elsinore Air Quality Impact Analysis*[2] and the *Baker Lake Elsinore Construction and Operational Health Risk Assessment*[3] prepared for the proposed Project (Appendices C-1 and C-2, respectively).

3.3.1 Scoping Process

Attendees of the public scoping meeting held on August 1, 2024, expressed a general concern for adverse air quality that may result from the proposed Project. The City of Lake Elsinore (City) received five comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to air quality. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to air quality included comments from the following:

- Armando Veliz, July 5, 2024, expressing concerns regarding traffic congestion and associated emissions.
- Jefrey Ong, July 10, 2024, expressing concerns regarding air pollution.
- The California Department of Justice's Bureau of Environmental Justice (Christie Vosburg for Rob Bonta), July 17, 2024, expressing concerns regarding the Project's potential impacts to air quality and public health, recommending that priority be placed on avoiding and/or mitigating land use conflicts and air quality impacts, and providing a document containing best practices and mitigation measures for warehouse projects.
- Briana Sara and Elliot Ruhland, July 19, 2024, expressing concerns regarding air quality and health and safety.
- The South Coast Air Quality Management District (Sam Wang), July 19, 2024, recommending that the Draft Environmental Impact Report include an adequate analysis regarding air quality, utilize SCAQMD's *CEQA Air Quality Handbook,* and comply with all applicable regulations. In addition, the comment recommended the Draft EIR consider including provided mitigation measures to reduce air quality impacts.

For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

1 South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.*
2 Urban Crossroads. 2025. *Baker Lake Elsinore Air Quality Impact Analysis*. June 3.
3 Urban Crossroads. 2025. *Baker Lake Elsinore Construction and Operational Health Risk Assessment*. June 3.

3.3.2 Methodology

Implementation of the proposed Project would result in criteria pollutant emissions associated with construction and operational sources. Construction activities would generate emissions from off-road construction equipment and on roadways as a result of construction-related truck hauling, vendor deliveries, and worker commuting. Operational activities would also generate emissions associated with miscellaneous on-site sources, such as natural gas combustion for cooking, heating, and landscaping equipment from the Onsite Development Area, and from operations-related traffic. This analysis utilizes the California Emissions Estimator Model (CalEEMod) version 2022.1 to quantify the criteria pollutant emissions for both construction and operation of the proposed Project. The maximum daily emissions are calculated for the criteria pollutants. The CalEEMod output for the proposed Project is contained in Appendix C-1.

CalEEMod provides a platform to calculate both construction emissions and operational emissions from a project. It calculates both the daily maximum and annual average for criteria pollutants as well as total or annual greenhouse gas (GHG) emissions. The model also provides default values for water and energy use. Specifically, the model performs the following calculations:

- Short-term construction emissions associated with demolition, site preparation, grading, building, architectural coating (painting), and paving from off-road construction equipment; on-road mobile equipment associated with workers, vendors, delivery, and hauling; fugitive dust associated with grading, demolition, truck loading, and roads; and volatile emissions of volatile organic compounds (VOCs) from architectural coating and paving.

- Operational emissions, such as on-road mobile vehicle traffic generated by the land uses, fugitive dust associated with roads, volatile emissions of VOCs from architectural coatings, off-road emissions from landscaping equipment, volatile emissions of VOCs from consumer products and cleaning supplies, natural gas usage in the buildings, electricity usage in the buildings, water usage by the land uses, and solid waste disposal by the land uses.

In addition, CalEEMod contains default values and existing regulation methodologies to use in each specific local air quality district region. Appropriate statewide default values can be utilized if regional default values are not defined. This analysis utilized Project-specific inputs and relevant model default factors, consistent with SCAQMD requirements.

The proposed Project's construction- and operation-related emissions were quantitatively estimated using CalEEMod and compared to the SCAQMD's thresholds of significance to evaluate whether the proposed Project would result in a potentially significant air quality impact.

Based on the SCAQMD's *Final Localized Significance Threshold Methodology*,[4] a localized significance threshold (LST) analysis was performed to evaluate the potential localized pollutant concentrations from emissions from both short-term construction activities and long-term on-site operations.

[4] South Coast Air Quality Management District. 2008. *Final Localized Significance Threshold Methodology.* July. Website: www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed June 2025).

In addition, to determine the potential health risk to people living and working near the proposed Project associated with construction and operational activities, a health risk assessment (HRA) was prepared for the proposed Project using the California Air Resources Board (CARB) Hotspots Analysis and Reporting Program Version 2 model, which includes the United States Environmental Protection Agency (USEPA) air dispersion model American Meteorological Society/USEPA Regulatory Model (AERMOD), and is included in Appendix C-2. For the purposes of an HRA, short-term emissions are of concern for analyzing acute health impacts, and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts.

3.3.3 Existing Environmental Setting

The city of Lake Elsinore is part of the South Coast Air Basin (SCAB) and is under the jurisdiction of SCAQMD. Background information about air pollutants and health effects, climate, meteorological conditions, and regional air quality conditions in the SCAB and local air quality conditions in the vicinity of the Project site is provided below.

3.3.3.1 Air Pollutants and Health Effects

Both State and federal governments have established health-based ambient air quality standards for six criteria air pollutants: carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, and suspended particulate matter. In addition, the State has set standards for sulfates, hydrogen sulfide (H_2S), vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. Two criteria pollutants, O_3 and NO_2, are considered regional pollutants because they (or their precursors) affect air quality on a regional scale. The remaining criteria pollutants, such as CO, SO_2, and lead, are considered local pollutants that tend to accumulate in the air locally.

The primary pollutants of concern in the Project area are O_3, CO, and suspended particulate matter. Significance thresholds established by an air quality district are used to manage total regional and local emissions within an air basin based on the air basin's attainment status for criteria pollutants. These emission thresholds were established for individual development projects that would contribute to regional and local emissions and could adversely affect or delay the air basin's projected attainment target goals for nonattainment criteria pollutants.

Because of the conservative nature of the SCAQMD significance thresholds and the basinwide context of individual development project emissions, there is no direct correlation between a single project and localized air quality-related health effects. One individual project that generates emissions exceeding a threshold does not necessarily result in adverse health effects for residents in the project vicinity. This condition is especially true when the criteria pollutants exceeding thresholds are those with regional effects, such as O_3 precursors like nitrogen oxides (NO_X) and VOCs.

Further, by its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. In developing thresholds of significance for air pollutants, the air quality districts have considered the emission levels for which a project's individual emissions would be

cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Occupants of facilities such as schools, daycare centers, parks and playgrounds, hospitals, and nursing and convalescent homes are considered more sensitive than the general public to air pollutants because these population groups have increased susceptibility to respiratory disease. Persons engaged in strenuous work or exercise also have increased sensitivity to poor air quality. Residential areas are considered more sensitive to air quality conditions than commercial and industrial areas because people generally spend longer periods of time at their residences, with greater associated exposure to ambient air quality conditions. Recreational uses are also considered sensitive compared to commercial and industrial uses due to greater exposure to ambient air quality conditions associated with exercise. These populations are referred to as sensitive receptors.

Air pollutants, their health effects, and other air pollution-related considerations are summarized in Table 3.3.A and described in more detail below.

Ozone. O_3 is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and NO_X. The main sources of ROG and NO_X, often referred to as O_3 precursors, are combustion processes (including combustion in motor vehicle engines) and the evaporation of solvents, paints, and fuels. Automobiles are typically the largest source of O_3 precursors. O_3 is referred to as a regional air pollutant because its precursors are transported and diffused by wind concurrently with O_3 production through the photochemical reaction process. O_3 causes eye irritation, airway constriction, and shortness of breath and can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema.

Carbon Monoxide. CO is an odorless, colorless gas usually formed as a result of the incomplete combustion of fuels. The single largest source of CO is motor vehicles. CO transport is limited—it disperses with distance from the source under normal meteorological conditions. However, under certain extreme meteorological conditions, CO concentrations near congested roadways or intersections may reach unhealthful levels that adversely affect local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service (LOS) or with extremely high traffic volumes. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Extremely high levels of CO, such as those generated when a vehicle is running in an unventilated garage, can be fatal.

Table 3.3.A: Sources and Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	• Precursor sources[1]: motor vehicles, industrial emissions, and consumer products	• Respiratory symptoms • Worsening of lung disease, leading to premature death • Damage to lung tissue • Crop, forest, and ecosystem damage • Damage to a variety of materials, including rubber, plastics, fabrics, paints, and metals
Particulate Matter Less Than 2.5 Microns in Diameter ($PM_{2.5}$)	• Cars and trucks (especially diesels). • Fireplaces and wood stoves • Windblown dust from roadways, agriculture, and construction	• Premature death • Hospitalization for worsening of cardiovascular disease • Hospitalization for respiratory disease • Asthma-related emergency room visits • Increased symptoms and increased inhaler usage
Particulate Matter Less Than 10 Microns in Diameter (PM_{10})	• Cars and trucks (especially diesels). • Fireplaces and wood stoves • Windblown dust from roadways, agriculture, and construction	• Premature death and hospitalization, primarily for worsening of respiratory disease • Reduced visibility and material soiling
Nitrogen Oxides (NO_X)	• Any source that burns fuels, such as cars, trucks, construction and farming equipment, and residential heaters and stoves	• Lung irritation • Enhanced allergic responses
Carbon Monoxide (CO)	• Any source that burns fuels, such as cars, trucks, construction and farming equipment, and residential heaters and stoves	• Chest pain in patients with heart disease • Headache • Lightheadedness • Reduced mental alertness
Sulfur Oxides (SO_X)	• Combustion of sulfur-containing fossil fuels • Smelting of sulfur-bearing metal ores • Industrial processes	• Worsening of asthma: increased symptoms, increased medication usage, and emergency room visits
Lead	• Contaminated soil	• Impaired mental functioning in children • Learning disabilities in children • Brain and kidney damage
Toxic Air Contaminants (TACs)	• Cars and trucks (especially diesels) • Industrial sources, such as chrome platers • Neighborhood businesses, such as dry cleaners and service stations • Building materials and products	• Cancer • Reproductive and developmental effects • Neurological effects

Source: California Air Resources Board. *Common Air Pollutants.* Website: https://ww2.arb.ca.gov/resources/common-air-pollutants (accessed July 2025).

[1] O_3 is not generated directly by these sources. Rather, chemicals emitted by these precursor sources react with sunlight to form O_3 in the atmosphere.

Particulate Matter. Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from human-made and natural sources. Particulate matter is categorized in two size ranges: PM_{10}, for particles less than 10 microns in diameter (i.e., coarse particulate matter), and $PM_{2.5}$, for particles less than 2.5 microns in diameter (i.e., fine particulate matter). Motor vehicles are the primary generators of particulates, through tailpipe emissions as well as brake pad and tire

wear, and road dust. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of such fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to CARB, studies in the United States and elsewhere have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks, and studies of children's health in California have demonstrated that particle pollution may significantly reduce lung function and growth in children.[5]

Nitrogen Dioxide. NO_2 is a reddish-brown gas that is a byproduct of combustion processes. Automobiles and industrial operations are the main sources of NO_2. Aside from its contribution to O_3 formation, NO_2 also contributes to other pollution problems, including a high concentration of fine particulate matter, poor visibility, and acid deposition. NO_2 may be visible as a coloring component on high-pollution days, especially in conjunction with high O_3 levels. NO_2 decreases lung function and may reduce resistance to infection.

Sulfur Dioxide. SO_2 is a colorless, acidic gas with a strong odor. It is produced by the combustion of sulfur-containing fuels such as oil, coal, and diesel. SO_2 has the potential to damage materials and can cause health effects at high concentrations. It can irritate lung tissue and increase the risk of acute and chronic respiratory disease.

Lead. Lead is a metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been mobile and industrial sources. As a result of the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Other stationary sources are waste incinerators, utilities, and lead-acid battery factories. Twenty years ago, mobile sources were the main contributor to ambient lead concentrations in the air. In the early 1970s, the USEPA established national regulations to gradually reduce the lead content in gasoline. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. The USEPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of the USEPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Toxic Air Contaminants. In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. Some examples of TACs include benzene, butadiene, formaldehyde, and H_2S. Potential human health effects of TACs include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs with varying degrees of toxicity. Individual TACs vary greatly in the health risk they present. At a given level of exposure, one TAC may pose a hazard that is many times greater than another.

TACs do not have ambient air quality standards, but they are regulated by the USEPA, CARB, and the SCAQMD. In 1998, CARB identified particulate matter from diesel-fueled engines as a TAC. CARB has completed a risk management process that identified potential cancer risks for a range of activities

[5] California Air Resources Board (CARB). 2020. *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10})*. Website: ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (accessed June 2025).

and land uses that are characterized by use of diesel-fueled engines.[6] High-volume freeways, stationary diesel engines, and facilities attracting heavy and constant diesel vehicle traffic (e.g., distribution centers, truck stops) were identified as posing the highest risk to adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high-volume transit centers, and schools with a high volume of bus traffic. Health risks from TACs are a function of both concentration and duration of exposure.

Unlike TACs emitted from industrial and other stationary sources noted above, most diesel particulate matter (DPM) is emitted from mobile sources—primarily "off-road" sources, such as construction and mining equipment, agricultural equipment, and truck-mounted refrigeration units, as well as trucks and buses traveling on freeways and local roadways.

The CARB Diesel Risk Reduction Plan is intended to substantially reduce DPM emissions and associated health risks through introduction of ultra-low-sulfur diesel fuel—a step already implemented—and cleaner-burning diesel engines.[7] The technology for reducing DPM emissions from heavy-duty trucks is well established, and both State and federal agencies are moving aggressively to regulate engines and emission control systems to reduce and remediate diesel emissions.

High-Volume Roadways. Air pollutant exposures and their associated health burdens vary considerably within places in relation to sources of air pollution. Motor vehicle traffic is perhaps the most important source of intra-urban spatial variation in air pollution concentrations. Air quality research consistently demonstrates that pollutant levels are substantially higher near freeways and busy roadways, and human health studies have consistently demonstrated that children living within 100 to 200 meters (approximately 325 to 650 feet) of freeways or busy roadways have reduced lung function and higher rates of respiratory disease. At present, it is not possible to attribute the effects of roadway proximity on noncancer health effects to one or more specific vehicle types or vehicle pollutants. Engine exhaust, from diesel, gasoline, and other combustion engines, is a complex mixture of particles and gases with collective and individual toxicological characteristics.

3.3.3.2 National and State Ambient Air Quality Standards

Both State and federal governments have established health-based ambient air quality standards for criteria air pollutants. Criteria pollutants are defined as those pollutants for which the federal and State governments have established ambient air quality standards, or criteria, for outdoor concentrations in order to protect public health.

Both the USEPA and CARB have established ambient air quality standards for the following common pollutants: CO, O_3, NO_2, SO_2, lead, and suspended particulate matter. Federal standards include both primary and secondary standards. Primary standards establish limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards

6 California Air Resources Board (CARB). 2000. *Fact Sheet – California's Plan to Reduce Diesel Particulate Matter Emissions*. October.

7 California Air Resources Board (CARB). 2000. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October. Prepared by the Stationary Source Division and Mobile Source Control Division. Website: https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpfinal.pdf (accessed June 2025).

set limits to protect public welfare, including protection against decreased visibility, and damage to animals, crops, vegetation, and buildings.[8]

In addition, the State has set standards for sulfates, H_2S, vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety. These ambient air quality standards are levels of contaminants that avoid specific adverse health effects associated with each pollutant. State and federal standards for the criteria air pollutants are listed in Table 3.3.B.

3.3.3.3 Existing Climate and Air Quality

The following provides a discussion of the local and regional air quality and climate in Lake Elsinore.

Climate and Meteorology. Air quality in the city is affected by various emission sources (e.g., mobile and industry), as well as atmospheric conditions (e.g., wind speed, wind direction, temperature, and rainfall). The combination of topography, low mixing height, abundant sunshine, and emissions from the second largest urban area in the United States gives the SCAB some of the highest pollutant concentrations in the country.

The annual average temperature varies little throughout the SCAB, ranging from the low to middle 60s degrees Fahrenheit (°F). With a more pronounced oceanic influence, coastal areas show less variability in annual minimum and maximum temperatures than inland areas. The climatological station closest to the Project area is located in Perris, California.[9] The monthly average maximum temperature recorded at this station ranged from 64.5°F in December to 96.9°F in August, with an annual average maximum of 78.7°F. The monthly average minimum temperature recorded at this station ranged from 34.7°F in January to 58.7°F in August, with an annual average minimum of 45.3°F. These levels are representative of the Project area.

The majority of annual rainfall in the SCAB occurs between December and March. Summer rainfall is minimal and is generally limited to scattered thundershowers in coastal regions and slightly heavier showers in the eastern portion of the SCAB and along the coastal side of the mountains. Average monthly rainfall at the Perris station varied from 0.06 inch in June to 1.97 inches in November, with an annual total of 10.42 inches. However, patterns in monthly and yearly rainfall totals are unpredictable due to fluctuations in the weather.

[8] United States Environmental Protection Agency (USEPA). 2024. NAAQS Table. December 16. Website: https://www.epa.gov/criteria-air-pollutants/naaqs-table#:~:text=Secondary%20standards%20provide%20public%20welfare,be%20revised%2C%20establishing%20new%20standards (accessed July 2025).

[9] Western Regional Climate Center. Recent Climate in the West. Perris, California (046816) Period of Monthly Climate Summary. Website: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca6816 (accessed June 2025).

Table 3.3.B: Federal and State Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,4]	Secondary [3,6]	Method [7]
Ozone (O_3)[8]	1-Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	–	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.07 ppm (137 µg/m³)		0.070 ppm (137 µg/m³)		
Respirable Particulate Matter (PM_{10})[9]	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		–		
Fine Particulate Matter ($PM_{2.5}$)[9]	24-Hour	–		35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	9.0 µg/m³ [o]	12.0 µg/m³ [o]	
Carbon Monoxide (CO)	1-Hour	20 ppm (23 mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 mg/m³)	–	Non-Dispersive Infrared Photometry (NDIR)
	8-Hour	9 ppm (10 mg/m³)		9 ppm (10 mg/m³)		
	8-Hour (Lake Tahoe)	6 ppm (7 mg/m³)		–	–	
Nitrogen Dioxide (NO_2)[10]	1-Hour	0.18 ppm (339 µg/m³)	Gas Phase Chemi-luminescence	100 ppb (188 µg/m³)	–	Gas Phase Chemi-luminescence
	Annual Arithmetic Mean	0.03 ppm (57 µg/m³)		53 ppb (100 µg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[11]	1-Hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 ppb (196 µg/m³)[k]	–	Ultraviolet Fluorescence; Spectro-photometry (Pararosaniline Method)
	3-Hour	–		–	0.5 ppm (1300 µg/m³)	
	24-Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas)	–	
	Annual Arithmetic Mean	–		0.030 ppm (for certain areas)[k]	–	
Lead (Pb)[12,13]	30-Day Average	1.5 µg/m³	Atomic Absorption	–	–	High-Volume Sampler and Atomic Absorption
	Calendar Quarter	–		1.5 µg/m³ (for certain areas)[l]	Same as Primary Standard	
	Rolling 3-Month Average	–		0.15 µg/m³		
Visibility-Reducing Particles [14]	8-Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No Federal Standards		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride [12]	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 2-3 (June 3, 2025).

Table notes continued on the following page.

[1] California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

[2] National standards (other than 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 PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.

[3] 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 CARB 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 USEPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the USEPA.

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

[9] On February 7, 2024, the national annual $PM_{2.5}$ standard was lowered from 12.0 $\mu g/m^3$ to 9.0 $\mu g/m^3$. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM_{10} standards (primary and secondary) of 150 $\mu g/m^3$ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

[10] To attain the 1-hour national standard, the three-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.

[11] On June 2, 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the three-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 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 ppb. California standards are in units of 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.

[12] CARB 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.

[13] The national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 $\mu g/m^3$ 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.

[14] In 1989, CARB 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.

°C = degrees Celsius
$\mu g/m^3$ = micrograms per cubic meter
CARB = California Air Resources Board
mg/m^3 = milligrams per cubic meter
ppb = parts per billion
ppm = parts per million
USEPA = United States Environmental Protection Agency

The SCAB experiences a persistent temperature inversion (increasing temperature with increasing altitude) as a result of the Pacific high, which is the semi-permanent high-pressure area of the north Pacific Ocean and is the dominating factor in California weather. This inversion limits the vertical dispersion of air contaminants, holding them relatively near the ground. As the sun warms the ground and the lower air layer, the temperature of the lower air layer approaches the temperature of the base of the inversion (upper) layer until the inversion layer finally breaks, allowing vertical mixing with the lower layer. This phenomenon is observed in mid-afternoon to late afternoon on hot summer days, when the smog appears to clear up suddenly. Winter inversions frequently break by midmorning.

Winds in the Project area blow predominantly from the southwest, with average speeds of 5.3 miles per hour (mph).[10] Summer wind speeds average slightly higher than winter wind speeds. Low average wind speeds, together with a persistent temperature inversion, limit the vertical dispersion of air pollutants throughout the SCAB. Strong, dry, north, or northeasterly winds, known as Santa Ana winds, occur during the fall and winter months and disperse air contaminants. The Santa Ana conditions tend to last for several days at a time.[11]

The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollution concentrations are the lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino counties. In the winter, the greatest pollution problems are CO and NO_X because of extremely low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and NO_X to form photochemical smog or O_3.

Attainment Status. CARB is required to designate areas of the State as attainment, nonattainment, or unclassified for all State standards. An attainment designation for an area signifies that pollutant concentrations did not violate the standard for that pollutant in that area. A nonattainment designation indicates that a pollutant concentration violated the standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An unclassified designation signifies that data do not support either an attainment or nonattainment status. The California Clean Air Act (CCAA) divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

Concerning O_3, CO, and NO_2, the USEPA designates areas as one of the following: does not meet the primary standards, cannot be classified, or better than national standards. For SO_2, areas are designated as: does not meet the primary standards, does not meet the secondary standards, cannot be classified, or better than national standards. Table 3.3.C provides a summary of the attainment status for the SCAB with respect to national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS).

[10] Weather Spark. 2025. *Climate and Average Weather Year Round in Lake Elsinore*. Website: https://weatherspark.com/y/1863/Average-Weather-in-Lake-Elsinore-California-United-States-Year-Round (accessed August 2025).

[11] Ibid.

Table 3.3.C: South Coast Air Basin Attainment Status

Pollutant	State	Federal
O_3 1 hour	Nonattainment	--
O_3 8 hour	Nonattainment	Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Nonattainment
CO	Attainment	Unclassifiable/Attainment
NO_2	Attainment	Unclassifiable/Attainment
SO_2	Attainment	Unclassifiable/Attainment
Lead	Attainment	Unclassifiable/Attainment
All others	Attainment/Unclassifiable	Attainment/Unclassifiable

Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 2-4 (June 3, 2025).
CO = carbon monoxide
N/A = not applicable
NO_2 = nitrogen dioxide
O_3 = ozone
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SO_2 = sulfur dioxide

Air Quality Monitoring Results. Air quality monitoring stations are located throughout the nation and are maintained by the local air pollution control district and State air quality regulating agencies. The SCAQMD, together with CARB, maintains ambient air quality monitoring stations in the SCAB. The air quality monitoring station closest to the Project area is the Lake Elsinore monitoring station, located approximately 2.45 miles southeast of the Project site. The Lake Elsinore monitoring station reports air quality statistics for O_3, CO, NO_2, and PM_{10}. The Lake Elsinore monitoring station does not provide data for $PM_{2.5}$; thus, data from the Metropolitan Riverside County 1 station, which is the closest monitoring station for $PM_{2.5}$, were utilized.[12] Data for SO_2 were omitted as attainment is regularly met in the SCAB and few monitoring stations measure SO_2 concentrations. The most recent 3 years of data available are shown in Table 3.3.D.

Pollutant monitoring results for 2021 to 2023 at the Lake Elsinore and Metropolitan Riverside County 1 monitoring stations detail that the federal PM_{10} standard had no exceedances during the 3-year period. The State PM_{10} standard had four exceedances in 2021, one exceedance in 2022, and five exceedances in 2023. The federal $PM_{2.5}$ levels had 10 exceedances in 2021 and 1 exceedance each in 2022 and 2023. The State 1-hour O_3 standards were exceeded 18 times in 2021, 17 times in 2022, and 10 times in 2023. The State and federal 8-hour O_3 standards were exceeded 18 times in 2021, 17 times in 2022, and 10 times in 2023. The CO and NO_2 standards were not exceeded in this area during the 3-year period.

[12] The Metropolitan Riverside County 1 monitoring station is approximately 10 miles north of the Project site.

Table 3.3.D: Ambient Air Quality in the Project Vicinity

Pollutant	Standard	2021	2022	2023
Carbon Monoxide (CO)				
Maximum 1-hour concentration (ppm)		0.9	0.9	1.3
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		0.8	0.6	0.7
Number of days exceeded:	State: > 9 ppm	0	0	0
	Federal: > 9 ppm	0	0	0
Ozone (O_3)				
Maximum 1-hour concentration (ppm)		0.118	0.121	0.120
Number of days exceeded:	State: > 0.09 ppm	18	17	10
Maximum 8-hour concentration (ppm)		0.097	0.091	0.103
Number of days exceeded:	State: > 0.07 ppm	18	17	10
	Federal: > 0.07 ppm	18	17	10
Coarse Particulates (PM_{10})				
Maximum 24-hour concentration (µg/m^3)		89	91	186
Number of days exceeded:	State: > 50 µg/m^3	4	1	5
	Federal: > 150 µg/m^3	0	0	1
Annual arithmetic average concentration (µg/m^3)		21.4	19.8	20.8
Exceeded for the year:	State: > 20 µg/m^3	Yes	No	Yes
	Federal: > 50 µg/m^3	No	No	No
Fine Particulates ($PM_{2.5}$)				
Maximum 24-hour concentration (µg/m^3)		82.1	38.5	48.7
Number of days exceeded:	Federal: > 35 µg/m^3	10	1	1
Annual arithmetic average concentration (µg/m^3)		12.6	10.4	10.5
Exceeded for the year:	State: > 12 µg/m^3	Yes	No	No
	Federal: > 15 µg/m^3	No	No	No
Nitrogen Dioxide (NO_2)				
Maximum 1-hour concentration (ppm)		0.044	0.037	0.047
Number of days exceeded:	State: > 0.250 ppm	0	0	0
Annual arithmetic average concentration (ppm)		0.007	0.007	0.007
Exceeded for the year:	Federal: > 0.053 ppm	No	No	No

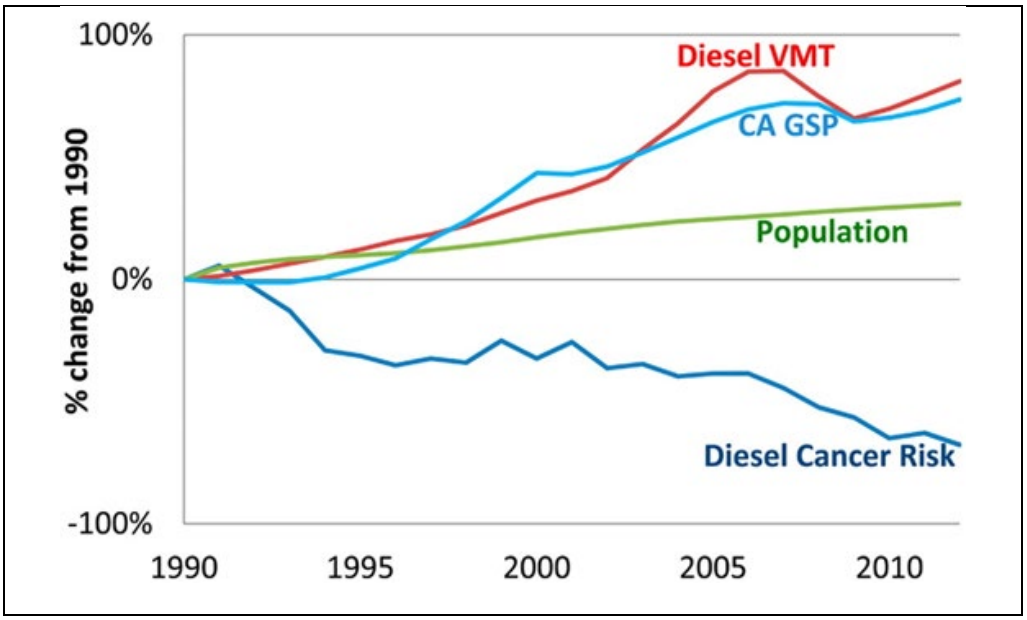
Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 2-5 (June 3, 2025).
ppm = parts per million

Toxic Air Contaminant Trends. In 1984, CARB adopted regulations to reduce TAC emissions from mobile and stationary sources, as well as consumer products. A CARB study showed that ambient concentrations and emissions of the seven TACs responsible for the most cancer risk from airborne exposure declined by 76 percent between 1990 and 2012.[13] Concentrations of DPM, a key TAC, declined by 68 percent between 1990 and 2012 despite a 31 percent increase in State population and an 81 percent increase in diesel vehicle miles traveled (VMT), as shown on Figure 3.3-1, below. The study also found that the significant reductions in cancer risk to California residents from the implementation of air toxics controls are likely to continue.

[13] Propper, Ralph, et al. 2015. Ambient and Emission Trends of Toxic Air Contaminants in California. *American Chemical Society: Environmental Science & Technology*. Website: https://pubs.acs.org/doi/pdf/10.1021/acs.est.5b02766?ref=article_openPDF (accessed June 2025).

The USEPA and CARB regulate direct emissions from motor vehicles. The SCAQMD is the regional agency primarily responsible for regulating air pollution emissions from stationary sources (e.g., factories) and indirect sources (e.g., traffic associated with new development), as well as monitoring ambient pollutant concentrations.

Figure 3.3-1: California Population, Gross State Product (GSP), Diesel Cancer Risk, and Diesel Vehicle Miles Traveled Regulatory Context



Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Exhibit 2-A (June 3, 2025).

3.3.4 Regulatory Setting

The following describes federal, State, regional, and local (e.g., City) regulations applicable to the proposed Project related to air quality.

3.3.4.1 Federal Regulations

The following federal regulations would be applicable to the proposed Project.

Clean Air Act. At the federal level, the USEPA has been charged with establishing and implementing national air quality programs and mandates pursuant to the Federal Clean Air Act (FCAA), which was enacted in 1963 and subsequently amended in 1970, 1977, and 1990.

The FCAA required the USEPA to establish NAAQS for the six criteria pollutants and required each state to prepare an air quality control plan referred to as a State Implementation Plan (SIP) for local areas that do not meet these standards. The FCAA Amendments of 1990 added requirements for states with nonattainment areas to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of the air basins as reported by their jurisdictional agencies. The

FCAA requires demonstration of reasonable progress toward attainment and provides for sanctions for failure to attain or meet interim milestones. The USEPA has the responsibility to review all SIPs to determine their conformity with the mandates of the FCAA and whether implementation will achieve air quality goals. Failure to submit an approvable SIP or to implement the plan within the mandated timeframe may result in sanctions on transportation funding and stationary air pollution sources in the air basin.

The USEPA is also required to develop National Emission Standards for Hazardous Air Pollutants, which are defined as those that may reasonably be anticipated to result in increased deaths or serious illness and that are not already regulated. An independent science advisory board reviews the health and exposure analyses conducted by the USEPA on suspected hazardous pollutants prior to regulatory development.

The SmartWay Program is a public-private initiative among the USEPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and State agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of pollution emissions) of the goods movement supply chains. SmartWay consists of four components:

1. **SmartWay Transport Partnership:** A partnership in which freight carriers and shippers commit to benchmarking operations, tracking fuel consumption, and improving performance annually.

2. **SmartWay Technology Program:** A testing, verification, and designation program to help freight companies identify equipment, technologies, and strategies that save fuel and lower emissions.

3. **SmartWay Vehicles:** A program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo.

4. **SmartWay International Interests:** A program that provides guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay.

SmartWay effectively refers to requirements geared toward reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all heavy-duty trucks will have to comply with the 2010 CARB GHG Regulation[14] that is designed with the SmartWay Program in mind to reduce emissions by making them more fuel-efficient. For instance, in 2015, 53-foot or longer dry vans or refrigerated trailers equipped with a combination of SmartWay-verified, low-rolling-resistance tires, and SmartWay-verified aerodynamic devices would obtain an approximately 10 percent or more fuel savings over traditional trailers.

Through the SmartWay Technology Program, the USEPA has evaluated the fuel-saving benefits of various devices through grants, cooperative agreements, emissions and fuel economy testing, demonstration projects, and technical literature review. As a result, the USEPA has determined that

[14] California Air Resources Board (CARB). CARB Tractor-Trailer Greenhouse Gas Regulation. Website: www.arb.ca.gov/our-work/programs/ttghg (accessed June 2025).

the following types of technologies provide fuel saving and/or emission-reducing benefits when used properly in their designed applications and has verified certain products:

- **Idle-Reduction Technologies:** Less idling of the engine when it is not needed would reduce fuel consumption.

- **Aerodynamic Technologies:** Aerodynamic technologies minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.

- **Low-Rolling-Resistance Tires:** Low-rolling-resistance tires can roll longer without slowing down, thereby reducing the amount of fuel used. Rolling resistance (or rolling friction or rolling drag) is the force resisting the motion when a tire rolls on a surface. The wheel will eventually slow down because of this resistance.

- **Retrofit Technologies:** Retrofit technologies include things such as diesel particulate filters, emissions upgrades (to a higher tier), etc., that would reduce emissions.

- **Federal Excise Tax Exemptions.** While the SmartWay program itself does not offer direct tax exemptions, its focus on efficiency and emissions reduction can make fleets eligible for various tax benefits offered by other programs, including those related to idling reduction devices and alternative fuels.

3.3.4.2 State Regulations

The following State regulations would be applicable to the proposed Project.

California Clean Air Act. In 1988, the CCAA required that all air quality districts in the State endeavor to achieve and maintain CAAQS for CO, O_3, SO_2, and NO_2 by the earliest practical date. The CCAA provides districts with the authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and areawide emission sources. Each nonattainment district is required to adopt a plan to achieve a 5 percent annual reduction, averaged over consecutive 3-year periods, in districtwide emissions of each nonattainment pollutant or its precursors. A Clean Air Plan, prepared by an air district, shows how an air district would reduce emissions to achieve air quality standards. Generally, the State standards for these pollutants are more stringent than the national standards.

California Air Resources Board. CARB is responsible for implementing the CCAA, which seeks to achieve maximum reduction of vehicular and other mobile emissions to attain CAAQS. CARB also established the CAAQS for the 10 air pollutants designated in the CCAA. These 10 State air pollutants are the six criteria pollutants designated by the FCAA, as well as four others (visibility-reducing particulates, H_2S, sulfates, and vinyl chloride). Generally, the CAAQS are more stringent than the NAAQS. The following are applicable CARB regulations:

- **California Code of Regulations (CCR) Title 24 Part 6:** California's Energy Efficiency Standards for Residential and Nonresidential Buildings were first adopted in 1978 as a strategy to reduce California's energy consumption and are adopted by the City pursuant to Section 15.02.010 (California Building Standards Code) of the City Municipal Code. Energy-efficient buildings require less electricity and natural gas; therefore, increased energy efficiency reduces fossil fuel consumption and decreases air quality emissions.

- **CCR Title 24 Part 11:** The California Green Building Standards Code (CALGreen) is a uniform regulatory code for all residential, commercial, and school buildings. Local jurisdictions may adopt more stringent requirements. The most recent approved update, consisting of the 2022 California Green Building Code Standards, became effective on January 1, 2023, and was adopted by the City pursuant to Section 15.02.010 (California Building Standards Code) of the City Municipal Code. The 2022 Title 24 standards will result in less energy use, thereby reducing air pollutant emissions associated with energy consumption in the SCAB and across California. Requirements of the 2022 CALGreen update that are applicable to the proposed Project include the following:

    - **5.106.4 Bicycle Parking.** Provide bicycle racks within 200 feet of the visitor's entrance for 5 percent of new visitor motorized vehicle parking spaces, with a minimum of one two-bicycle capacity rack.

    - **5.106.5.3 Electric Vehicle (EV) Charging.** Provide EV infrastructure and facilitate EV charging in compliance with the California Building Code and the California Electrical Code. The number of EV-capable spaces required are specified at approximately 20 percent of the total spaces. Provisions for medium- and heavy-duty EV spaces shall be included.

    - **5.106.12 Shade Trees.** Shade trees shall be planted to provide shade over 50 percent of the parking area within 15 years unless solar photovoltaic shade structures provide this shade.

    - **5.303.3 Water Conserving Plumbing Fixtures and Fittings.** All water fixtures shall comply with the California Code of Regulations, Title 20, (Appliance Efficiency Regulations), Section 1605 and Title 24, Section 5.303.3 (Water Conserving Plumbing Fixtures and Fittings).

    - **5.304.1 Outdoor Water Use.** Development shall comply with the City's water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.

    - **5.408.1 Construction Waste Management.** Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3, or meet the City's construction and demolition waste management ordinance, whichever is more stringent.

    - **5.410.1 Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals, or meet the City's local recycling ordinance, whichever is more restrictive.

- **CARB Regulations Adopted Starting in 1984 (e.g., Assembly Bill [AB] 1807 [Tanner, Statutes of 1983] and the Hot Spots Information and Assessment Act [AB 2588] in 1988):** Various CARB regulations adopted beginning in 1984 require CARB to identify and control toxic air pollutants to reduce the amount of TAC emissions from mobile and area sources, such as cars, trucks, stationary products, and consumer products, including mobile-source emissions of DPM, benzene, and 1,3-butadiene; those that are derived from stationary sources, such as perchloroethylene and hexavalent chromium; and those derived from photochemical reactions of emitted VOCs, such as formaldehyde and acetaldehyde.[15]

- **CARB's 2000 Diesel Risk Reduction Plan (DRRP):** The DRRP involves replacement and retrofit of diesel-fueled engines and the use of ultra-low-sulfur (less than 15 parts per million [ppm]) diesel fuel. As a result, DPM concentrations are expected to decline 71 percent from 2000 to 2020 even though the State's population increased 31 percent and the amount of diesel VMT increased 81 percent.[16]

- **CARB 2007 Off-Road Diesel Regulation:** This regulation pertains to off-road-duty diesel vehicles used in construction, mining, and industrial operations to reduce DPM and NO_X emissions. The regulation limits idling to no more than 5 consecutive minutes and imposes a timeline for performance requirements based on a fleet's average NO_X emissions, which can be met by replacing older vehicles with newer, cleaner vehicles or by applying exhaust retrofits.

- **CCR Title 13, Section 1956.8:** CCR Title 13, Section 1956.8, contains CARB-adopted standards to reduce emissions from various types of new on-road heavy-duty engines and vehicles, including the Heavy-Duty Diesel Vehicle Idling Reduction Program, and the Heavy-Duty Diesel In-Use Compliance Program.

- **CCR Title 13, Section 2025:** CCR Title 13, Section 2025, was adopted by CARB in 2008 to reduce emissions of DPM, NO_X, and other criteria pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles and applies to all on-road heavy-duty diesel-fueled vehicles with a gross vehicle weight rating greater than 14,000 pounds, agricultural yard trucks with off-road certified engines, and certain diesel-fueled shuttle vehicles of any gross vehicle weight rating. Older, heavier trucks (i.e., those with pre-year 2000 engines and a gross vehicle weight rating greater than 26,000 pounds) are required to have a particulate matter filter installed and to replace their engine with a 2010 engine between 2015 and 2020, depending on the model year. Effective December 31, 2014, the regulation was amended to require diesel trucks and buses that operate in California to be upgraded to further reduce emissions by, among other things, requiring mandatory replacement of lighter and older, heavier trucks so that by January 1, 2023, nearly all trucks and buses are required to have 2010 model year engines or equivalent.

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15 California Air Resources Board (CARB). 2021. 2020 Mobile Source Strategy. October. Website: www.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf (accessed June 2025).

16 Since the DRRP was completed in 2000, CARB has adopted Airborne Toxic Control Measures and regulations in alignment with the plan, including the landmark Truck and Bus Regulation, and has achieved a statewide reduction in ambient DPM levels of over 70 percent from 2000 levels.

AB 2588 Air Toxics "Hot Spots" Information and Assessment Act. Under AB 2588, stationary sources of air pollutants are required to report the types and quantities of certain substances that their facilities routinely release into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, identify facilities having localized impacts, determine health risks, and notify nearby residents of significant risks.

The California Air Resources Board Handbook. CARB has developed an *Air Quality and Land Use Handbook*[17] (CARB Handbook), which is intended to serve as a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. According to the CARB Handbook, air pollution studies have shown an association between respiratory and other noncancer health effects and proximity to high-traffic roadways. Other studies have shown that diesel exhaust and other cancer-causing chemicals emitted from cars and trucks are responsible for much of the overall cancer risk from airborne toxics in California. The CARB Handbook recommends that county and city planning agencies strongly consider proximity to these sources when finding new locations for "sensitive" land uses such as homes, medical facilities, daycare centers, schools, and playgrounds.

Land use designations with air pollution sources of concern include freeways, rail yards, ports, refineries, distribution centers, chrome plating facilities, dry cleaners, and large gasoline service stations. Key recommendations in the CARB Handbook include taking steps to avoid siting new, sensitive land uses:

- Within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day;
- Within 1,000 feet of a major service and maintenance rail yard;
- Immediately downwind of ports (in the most heavily impacted zones) and petroleum refineries;
- Within 300 feet of any dry-cleaning operation (for operations with two or more machines, provide 500 feet); and
- Within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater).

The CARB Handbook specifically states that its recommendations are advisory and acknowledges land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality-of-life issues.

The recommendations are generalized and do not consider site-specific meteorology, freeway truck percentages, or other factors that influence risk for a particular project site. The purpose of this

[17] California Air Resources Board (CARB). 2005. *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook). April.

guidance is to further examine project sites for actual health risk associated with the location of new sensitive land uses.

Title 13, Section 2449(d)(2) of the California Code of Regulations: Requires operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower (hp) and up that were not designed to be driven on road) to limit vehicle idling to 5 minutes or less.

Title 13, Sections 2013, et seq, of the California Code of Regulations: The Advanced Clean Fleets (ACF) Regulation is the latest development in CARB's decades-long history of setting increasingly stringent emission standards for mobile sources that are needed to protect the public health and welfare of Californians. The ACF Regulation requires fleets that are well suited for electrification to reduce emissions through requirements to both phase in the use of zero-emission vehicles (ZEVs) for targeted fleets and requirements that manufacturers only manufacture ZEV trucks starting in the 2036 model year.

3.3.4.3 Regional Regulations

The following regional regulations would be applicable to the proposed Project.

South Coast Air Quality Management District. The SCAQMD has jurisdiction over most air quality matters in the SCAB. This area includes all of Orange County, Los Angeles County except for the Antelope Valley, the nondesert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. Los Angeles County is a subregion of the SCAQMD jurisdiction. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the SCAB and is tasked with implementing certain programs and regulations required by the FCAA and the CCAA. The SCAQMD prepares plans to attain CAAQS and NAAQS. SCAQMD is directly responsible for reducing emissions from stationary (area and point) sources. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces such measures though educational programs or fines, when necessary.

- **Regulation IV – Prohibitions:** This regulation sets forth the restrictions for visible emissions, odor nuisance, fugitive dust, various air pollutant emissions, fuel contaminants, startup/shutdown exemptions, and breakdown events.
    - **Rule 402 – Nuisance:** This rule requires that no person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. The proposed Project will be required to comply with Rule 402.
    - **Rule 403 – Fugitive Dust:** This rule requires projects to incorporate fugitive dust control measures to prevent and reduce fugitive dust emissions and requires best available control measures to be applied to earthmoving and grading activities. The proposed Project will be required to comply with Rule 403.
- **Regulation XI – Source Specific Standards:** Regulation XI sets emissions standards for different sources.

- **Rule 1113 – Architectural Coatings:** This rule limits the amount of VOCs from architectural coatings and solvents, which lowers the emissions of odorous compounds. The proposed Project will be required to comply with Rule 1113.

- **Regulation XXIII – Facility Based Mobile Source Measures:** Regulation XXIII identifies measures for facility-based mobile sources.

  - **Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions (WAIRE) Program:** This rule requires the owners and operators of warehouses greater than 100,000 square feet to directly reduce NO_X and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The warehouse rule is a menu-based points system requiring warehouse operators to annually earn a specified number of points. These points can be earned by completing actions from a menu that can include acquiring and using natural gas, near-zero-emission and/or zero-emission on-road trucks, zero-emission cargo handling equipment, solar panels or zero-emission charging and fueling infrastructure, or other options. SCAQMD expects this rule to reduce emissions from warehouse uses by 10 to 15 percent.

The SCAQMD is responsible for demonstrating regional compliance with ambient air quality standards but it has limited direct involvement in reducing emissions from fugitive, mobile, and natural sources. To that end, the SCAQMD works cooperatively with CARB, the Southern California Association of Governments (SCAG), county transportation commissions (CTCs), local governments, and other federal and State government agencies. It has responded to this requirement by preparing a series of Air Quality Management Plans (AQMPs) to meet the CAAQS and NAAQS. SCAQMD and SCAG are responsible for formulating and implementing the AQMP for the SCAB to bring the basin into compliance with federal and State air quality standards. Every several years, the SCAQMD prepares a new AQMP, updating the previous plan and the 20-year horizon. The Final 2022 Air Quality Management Plan is the currently adopted AQMP. Key elements of the Final 2022 AQMP include the following:

- Calculating and taking credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation);

- A strategy with fair-share emission reductions at the federal, State, and local levels;

- Investment in strategies and technologies meeting multiple air quality objectives;

- Seeking new partnerships and significant funding for incentives to accelerate deployment of zero-emission and near-zero-emission technologies;

- Enhanced socioeconomic assessment, including an expanded environmental justice analysis;

- Attainment of the 24-hour $PM_{2.5}$ standard in 2019 with no additional measures;

- Attainment of the annual $PM_{2.5}$ standard by 2025 with implementation of a portion of the O_3 strategy; and

- Attainment of the 1-hour O_3 standard by 2022 with no reliance on "black box" future technology (FCAA Section 182(e)(5) measures).[18]

The 2022 AQMP builds upon measures already in place from previous AQMPs and includes a variety of additional strategies, such as regulation, accelerated deployment of available cleaner technologies (e.g., zero-emissions technologies, when cost-effective and feasible, and low-NO_X technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other FCAA measures.

Southern California Association of Governments. SCAG is a council of governments for Los Angeles, Orange, Riverside, San Bernardino, Imperial, and Ventura counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy and community development, and the environment. SCAG is the federally designated Metropolitan Planning Organization (MPO) for the majority of the Southern California region and prepares the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP), which address regional development and growth forecasts and form the basis for the land use and transportation control portions of the AQMP and are utilized in the preparation of the air quality forecasts and consistency analysis included in the AQMP. The RTP, RTIP, and AQMP are based on projections originating from local jurisdictions' land use planning documents.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG's Regional Comprehensive Plan (RCP) provides growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD. The RCP is a framework for decision making for local governments, assisting them in meeting federal and State mandates for growth management, mobility, and environmental standards while maintaining consistency with regional goals regarding growth and changes. Policies within the RCP include consideration of air quality, land use, transportation, and economic relationships by all levels of government.

SCAG adopted the Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal 2024)[19] on April 4, 2024. Connect SoCal 2024 is a long-range visioning plan that balances future mobility and housing needs with economic,

[18] FCAA § 182(e)(5) (42 U.S.C. § 7511a(e)(5)) allows "extreme" nonattainment areas to rely on the adoption of "new technologies" in their attainment demonstration with the expectation that new or improved control technologies will materialize. These measures are commonly referred to as "black box" measures because they are not defined specifically at the time of plan development. See: https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/black-box_final.pdf?sfvrsn=4, site (accessed June 2025).

[19] Southern California Association of Governments (SCAG). 2024. *Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments.* Website: https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (accessed June 2025).

environmental, and public health goals. Connect SoCal 2024 identifies that the SCAG area would reach the GHG emissions reduction target set by CARB, including the regional target of reducing GHG emissions from autos and light-duty trucks from 2005 levels by 19 percent by 2035.

3.3.4.4 Local Regulations

The following local regulations would be applicable to the proposed Project.

Good Neighbor Policy. The City adopted the Good Neighbor Policy for Logistics and Warehouse/ Distribution Uses (Policy Number 400-16) on April 25, 2023. The goal of this policy is to provide a framework through which large-scale logistics and warehouse projects can be designed and operated in a way that lessens any impacts on surrounding communities and the environment. The guidelines require the following standards to be implemented for warehousing facilities within the city:

- All construction and grading related activities shall comply with the SCAQMD Regulations in effect at the time work commences.
- The following environmentally responsible practices shall be required during construction:
    - The highest-rated CARB tier of construction equipment available shall be utilized.
    - Electric-powered hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors shall be used.
    - Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge if the utility provider can provide temporary power for this purpose.
- Identification in site plans of a location for future electric truck charging stations and installation of a conduit to that location.
- A Property Maintenance Program shall be submitted for review and approval by the Community Development Director, or designee, prior to the issuance of building permits. The program shall provide for the regular maintenance of building structures, landscaping, and paved surfaces in good physical condition and appearance. The methods and maximum intervals for maintenance of each component shall be specified in the program.
- Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.
- The applicant shall place a weatherproof sign at the entrance to the Project site identifying the approved days and hours of construction activity and install signage that clearly identifies the contact information of the development manager.
- Facility hours of business operation for projects with buildings located within 1,000 feet of a sensitive receptor shall be reviewed on a project-by-project basis. At no time shall refrigerated trucks parked outdoors run and/or idle outside of the facility hours of operation. Changes to the

hours of operation shall be reviewed on a project-by-project basis and shall be included in the Conditions of Approval for the Project.

- A City representative shall conduct periodic on-site inspections during and after construction to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities.

3.3.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed Project would have a significant adverse impact with respect to air quality if it would:

Threshold 3.3.1: Conflict with or obstruct implementation of the applicable air quality plan,

Threshold 3.3.2: Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable Federal or State ambient air quality standard,

Threshold 3.3.3: Expose sensitive receptors to substantial pollutant concentrations, or

Threshold 3.3.4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

3.3.5.1 Consistency with Applicable Air Quality Plans

Pursuant to the methodology provided in Chapter 12 of the *CEQA Air Quality Handbook,*[20] a project is consistent with the AQMP when it: (1) is consistent with the AQMP's growth assumptions established pursuant to projections of local planning agencies to determine control strategies for regional compliance status; and (2) would not increase the frequency or severity of an air quality standards violation or cause a new violation.

3.3.5.2 Regional Emissions Thresholds

SCAQMD has established daily emissions thresholds for construction and operation of a proposed project in the SCAB. The emissions thresholds were established based on the attainment status of the SCAB with regard to air quality standards for specific criteria pollutants. Because the concentration standards were set at a level that protects public health with an adequate margin of safety, these emissions thresholds are regarded as conservative and would overstate an individual project's contribution to health risks.

Table 3.3.E lists the CEQA significance thresholds for construction and operational emissions established for the SCAB.

[20] South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.* (Note: The 1993 CEQA Air Quality Handbook is no longer available online.)

Table 3.3.E: Regional Thresholds for Construction and Operational Emissions

Emissions Source	Pollutant Emissions Threshold (lbs/day)					
	VOC	NO_X	CO	PM_{10}	$PM_{2.5}$	SO_X
Construction	75	100	550	150	55	150
Operations	55	55	550	150	55	150

Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 3-1 (June 3, 2025).
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOC = volatile organic compounds

Projects in the SCAB with construction- or operation-related emissions that exceed any of their respective emissions thresholds would be considered significant under SCAQMD guidelines. These thresholds, which SCAQMD developed and that apply throughout the SCAB, apply as both project and cumulative thresholds. If a project exceeds these standards, it is considered to have both a project-specific and cumulative impact.

3.3.5.3 Local Microscale Concentration Standards

The significance of localized project impacts under CEQA depends on whether ambient CO levels in the vicinity of the Project site are above or below State and federal CO standards. Because ambient CO levels are below the standards throughout the SCAB, a project would be considered to have a significant CO impact if project emissions result in an exceedance of one or more of the 1-hour or 8-hour standards. The following are the applicable local emission concentration standards for CO:

- California State 1-hour CO standard of 20 ppm; and
- California State 8-hour CO standard of 9 ppm.

3.3.5.4 Localized Impacts Analysis

SCAQMD published its *Final Localized Significance Threshold Methodology* in June 2003 and updated it in July 2008,[21] recommending that all air quality analyses include an assessment of both construction and operational impacts on the air quality of nearby sensitive receptors. LSTs represent the maximum emissions from a project site that are not expected to result in an exceedance of the NAAQS or the CAAQS for CO, NO_2, PM_{10}, and $PM_{2.5}$, as shown in Table 3.3.F. LSTs are based on the ambient concentrations of that pollutant within each of the SCAQMD identified Source Receptor Areas (SRAs) and the distance to the nearest sensitive receptor. The Project site is in the Lake Elsinore SRA (SRA 25). Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to adverse air quality. The nearest sensitive receptors in proximity to the Project site is an existing residence located approximately 92 feet west of the Project site. Table 3.3.F shows the emissions thresholds that would apply based on the Project size and distance to nearby receptors during Project construction and operation, respectively.

[21] South Coast Air Quality Management District. 2008. *Final Localized Significance Threshold Methodology.* July. Website: www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed June 2025).

Table 3.3.F: SCAQMD Localized Significance Thresholds

Emissions Source Category	Pollutant Emissions				
	NO_2	CO		PM_{10}	$PM_{2.5}$
Averaging Time	1-Hour	1-Hour	8-Hour	24-Hour	24-Hour
Project Construction	0.18	20.0	9.0	10.4	10.1
Project Operation	0.18	20.0	9.0	2.5	2.5

Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 3-1 (June 3, 2025).
Note: The local Source Receptor Area is Lake Elsinore (SRA 25) based on a 92-foot distance from the nearest sensitive receptor.
CO = carbon monoxide
lbs/day = pounds per day
NO_2 = nitrogen dioxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District

3.3.5.5 Health Risk Assessment Thresholds

Both the State and federal governments have established health-based ambient air quality standards for seven air pollutants. For other air pollutants without defined significance standards, the definition of substantial pollutant concentrations varies. For TACs, "substantial" is taken to mean that the individual health risk exceeds a threshold considered to be a prudent risk management level.

The following limits for maximum individual cancer risk (MICR) and noncancer acute and chronic Hazard Index (HI) from project emissions of TACs are recommended by SCAQMD for use in determining the health risk for projects in the SCAB:

- **MICR:** MICR is the estimated probability of a maximally exposed individual (MEI) contracting cancer as a result of exposure to TACs over a period of 30 years for adults and 9 years for children in residential locations and over a period of 25 years for workers. The MICR calculations include multipathway consideration, when applicable.

  The cumulative increase in MICR that is the sum of the calculated MICR values for all TACs would be considered significant if it would result in an increased MICR greater than 10 in 1 million (1×10^5) at any receptor location. [22]

- **Chronic HI:** Chronic HI is the ratio of the estimated long-term level of exposure to a TAC for a potential MEI to its chronic reference exposure level. The chronic HI calculations include multipathway consideration, when applicable.[23]

[22] South Coast Air Quality Management District (SCAQMD). 2024. *Risk Assessment Procedures for Rules 1401, 1401.1, and 212.* October 21. Website: https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=8#:~:text=South%20Coast%20AQMD%20Rule%201401,Guidelines)%20for%20calculating%20health%20risks (accessed September 2025).

[23] Ibid.

The Project would be considered significant if the cumulative increase in total chronic HI for any target organ system would exceed 1.0 at any receptor location.[24]

- **Acute HI:** Acute HI is the ratio of the estimated maximum 1-hour concentration of a TAC for a potential MEI to its acute reference exposure level.

  The Project would be considered significant if the cumulative increase in total acute HI for any target organ system would exceed 1.0 at any receptor location.[25]

The SCAQMD *CEQA Air Quality Handbook*[26] (currently under amendment) states that emissions of TACs are considered significant if an HRA shows an increased risk of greater than 10 in 1 million. Based on guidance from SCAQMD in the document *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis,*[27] for the purposes of this analysis, the threshold of 10 in 1 million was used as the cancer risk threshold for the proposed Project.

3.3.6 Project Impacts

Threshold 3.3.1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

Significant and Unavoidable Impact. As discussed above, pursuant to the methodology provided in Chapter 12 of the *CEQA Air Quality Handbook,* a project is consistent with the AQMP when it: (1) would not increase the frequency or severity of an air quality standards violation or cause a new violation (Consistency Criterion 1); and (2) is consistent with the AQMP's growth assumptions established pursuant to projections of local planning agencies to determine control strategies for regional compliance status (Consistency Criterion 2). These criteria are discussed below:

Consistency Criterion 1. As demonstrated under Threshold 3.3.2, below, the proposed Project would result in significant and unavoidable long-term operational pollutant emissions. As such, the proposed Project would not be consistent with Criterion 1.

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24 South Coast Air Quality Management District (SCAQMD). 2024. *Risk Assessment Procedures for Rules 1401, 1401.1, and 212.* October 21. Website: https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=8#:~:text=South%20Coast%20AQMD%20Rule%201401,Guidelines)%20for%20calculating%20health%20risks (accessed September 2025).

25 Ibid.

26 South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.* November. Updated March 2023. Website: www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993) (accessed June 2025). (The SCAQMD air quality significance thresholds were updated in March 2023 to reflect the USEPA's redesignation of the Coachella Valley from Severe-15 to Extreme nonattainment for the 2008 ozone national ambient air quality standards.)

27 South Coast Air Quality Management District (SCAQMD). 2002. Mobile Source Toxics Analysis. Website: www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis (accessed June 2025).

Consistency Criterion 2. The 2022 AQMP demonstrates that the applicable ambient air quality standards can be achieved within the time frames required under federal law. Growth projections from local general plans adopted by cities in the district are provided to the SCAG, which develops regional growth forecasts, which are then used to develop future air quality forecasts for the AQMP. Development consistent with the growth projections in the City of Lake Elsinore General Plan is considered to be consistent with the AQMP.

As discussed above, SCAG adopted the 2020–2045 RTP/SCS, a planning document that supports the integration of land use and transportation to help the region meet the federal MPO requirements under the Sustainable Communities and Climate Protection Act. The proposed Project would be developed in accordance with all applicable rules and regulations contained in those plans. It should be noted that although the 2024–2050 RTP/SCS was released after approval of the 2022 AQMP, the 2022 AQMP is reliant in part upon the general plan land use designations. The City of Lake Elsinore General Plan Land Use designation of the Project site is Limited Industrial. This is consistent with the land use designation assumed by both the 2020–2045 RTP/SCS and the 2024–2050 RTP/SCS. The Project does not propose or require amendment of the site's current General Plan Land Use designation.

AQMP Consistency Conclusion. Based on the discussion above, the proposed Project would have the potential to conflict with or obstruct implementation of applicable air quality plans under Criterion 1 because the proposed Project would result in significant and unavoidable long-term operational pollutant emissions. As discussed in Threshold 3.3.2, below, although there is no feasible mitigation to reduce operational pollutant emissions to a less than significant level, **Project Design Features (PDFs) AQ-1** through **AQ-5** and **Mitigation Measures (MMs) AQ-1** through **AQ-10** (see Threshold 3.3.2) would require the implementation of all feasible measures to reduce operational impacts associated with the proposed Project. Impacts would be **significant and unavoidable**.

Threshold 3.3.2: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable Federal or State ambient air quality standard?

Significant and Unavoidable Impact. The SCAB is currently designated nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the SCAB is in nonattainment for the State PM_{10} standard. The SCAB's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. Therefore, additional analysis to assess cumulative impacts is not necessary.

The following analysis assesses the potential air quality impacts associated with construction and operation of the proposed Project.

Construction Emissions. During construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include CO, NO_x, VOCs, directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as diesel exhaust particulate matter.

Construction activities would include demolition, site preparation, grading, building construction, architectural coating, and paving activities. The proposed Project would also include off-site/lift station improvements that would consist of grading, building construction, paving, architectural coating, linear grubbing and land clearing, linear grading and excavation, linear drainage, utilities and sub-grade, and linear paving activities within the Offsite Improvements Area.

Construction-related effects on air quality are typically greatest during the grading and site preparation phases due to the disturbance of soils. If not properly controlled, these activities would temporarily generate particulate emissions. Sources of fugitive dust would include disturbed soils at construction sites. Unless properly controlled, vehicles leaving construction sites would deposit dirt and mud on local streets, which could be an additional source of airborne dust after it dries. PM_{10} emissions would vary from day to day, depending on the nature and magnitude of construction activity and local weather conditions. PM_{10} emissions would depend on soil moisture, silt content of soil, wind speed, and the amount of operating equipment. Larger dust particles would settle near the source, while fine particles would be dispersed over greater distances from the construction site.

Water or other soil stabilizers can be used to control dust, resulting in emission reductions of 50 percent or more. The SCAQMD has established Rule 403 (Fugitive Dust), which would require the contractor to implement measures that would reduce the amount of particulate matter generated during the construction period, which was assumed by CalEEMod.

In addition to dust-related PM_{10} emissions, heavy trucks and construction equipment powered by gasoline and diesel engines would generate CO, SO_2, NO_X, VOCs, and some soot particulate ($PM_{2.5}$ and PM_{10}) in exhaust emissions. If construction activities were to increase traffic congestion in the area, CO and other emissions from traffic would increase slightly while those vehicles idle in traffic. These emissions would be temporary in nature and limited to the immediate area surrounding the construction site.

Construction emissions were estimated for the proposed Project using CalEEMod. This analysis assumes that construction of the proposed Project is expected to commence in April 2026 and would last through August 2027 for Project build out of the Onsite Development Area, while construction would begin in September 2025 and last through May 2027 for the off-site/lift station improvements within the Offsite Improvements Area. It is anticipated that Project build out would require the off-haul of approximately 2,336 square feet of existing structures and the export of approximately 50,000 cubic yards of earthwork, which was included in CalEEMod. Consistent with the City of Lake Elsinore Good Neighbor Policy for Logistics and Warehouse/Distribute uses, this analysis assumes the use of Tier 4 Interim construction equipment. The number of worker and

hauling trips assumed in CalEEMod are default assumptions[28] that only assign vendor trips to the building construction phase. Vendor trips would likely occur during all phases of construction; as such, vendor trips in CalEEMod were adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. Additionally, because paving and architectural coating activities overlap with building construction, the vendor trips assigned to building construction activities are assumed to be the same trips used to cover paving and architectural coating. All other construction details are not yet known; therefore, CalEEMod default assumptions (e.g., construction worker and truck trips and fleet activities) were used. Construction-related emissions are presented in Table 3.3.G. CalEEMod output sheets are included in Appendix C-1.

The maximum daily emissions of VOCs, NO_X, sulfur oxides (SO_X), CO, PM_{10}, and $PM_{2.5}$ that would result from construction of the proposed Project are shown in Table 3.3.G and compared to the SCAQMD regional significance thresholds.

Table 3.3.G: Project Construction Emissions

Construction Year	Maximum Pollutant Emissions (lbs/day)					
	VOCs	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Summer						
2025	2.08	23.42	29.61	0.06	3.28	1.59
2026	22.52	59.01	87.28	0.22	8.87	3.31
2027	64.23	32.40	77.04	0.09	8.81	2.40
Winter						
2025	0.30	9.83	15.54	0.02	0.17	0.16
2026	3.09	38.92	79.42	0.12	8.37	2.21
2027	60.49	34.18	75.58	0.11	9.17	2.39
Maximum Daily Emissions	**64.23**	**59.01**	**87.28**	**0.22**	**9.17**	**3.31**
SCAQMD Threshold	75.0	100.0	550.0	150.0	150.0	55.0
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads. *Baker Lake Elsinore Air Quality Impact Analysis*. Table 3-5. June 3, 2025.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

As shown in Table 3.3.G, construction emissions associated with the proposed Project would not exceed the SCAQMD's thresholds. Therefore, construction of the proposed Project would not result in a cumulatively considerable increase of any criteria pollutant for which the Project region is in nonattainment under an applicable NAAQS or CAAQS. Construction impacts would be **less than significant**, and mitigation is not required.

[28] According to the CalEEMod User Guide, default assumptions in CalEEMod utilize widely accepted methodologies for estimating emissions that can be used when site-specific information is not available. Sources of these methodologies and default data include, but are not limited to, the USEPA AP-42 emission factors, CARB vehicle emission models, and studies commissioned by the California Energy Commission and California Department of Resources Recycling and Recovery.

Operational Emissions. Long-term air pollutant emission impacts are those associated with mobile source emissions (e.g., vehicle and truck trips), energy source emissions (e.g., natural gas), area source emissions (e.g., architectural coatings and the use of landscape maintenance equipment), on-site cargo handling equipment emissions, stationary source emissions (use of diesel-powered emergency generators), and transportation refrigeration units (TRUs) related to the proposed Project.

Mobile-source emissions include VOCs and NO_X emissions that contribute to the formation of O_3. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

The proposed Project would generate emissions from daily operations that would include heavy-duty truck trips from warehouse operations. The *Scoping Agreement for Traffic Impact Study*[29] determined that the proposed Project would generate a total of 2,384 total trips per day, consisting of 1,400 passenger car trips and 984 truck trips. In addition, the proposed Project is expected to generate approximately 295 total trips, including 182 passenger car trips and 113 truck trips, on Saturday and approximately 152 total trips, including 96 passenger car trips and 56 truck trips, on Sunday.

As the distances the warehouse haul trucks would travel is unknown, consistent with SCAQMD recommended truck trip lengths, it was conservatively assumed that the average trip length would be 15.3 miles for 2-axle trucks, 14.2 miles for 3-axle trucks, and 40 miles for 4+-axle trucks.[30] Weighing the average trip lengths using traffic trip percentages taken from the *Scoping Agreement for Traffic Impact Study,*[31] the trip length function for the proposed uses was assumed to be 28.54 miles for the high-cube cold storage and high-cube fulfillment warehouse uses and 30.47 miles for the manufacturing use with an assumption of 100 percent primary trips.

Energy-source emissions result from activities in buildings for which natural gas is used. The proposed Project would be all-electric; therefore, energy-source emissions would be nominal.

Typically, area source emissions consist of direct sources of air emissions located at the Project site. Area-source emissions associated with the Project would include emissions from the use of landscaping equipment and the use of consumer products.

In addition, the proposed Project would result in on-site cargo handling equipment emissions emanating from the Onsite Development Area. For this Project, the on-site modeled operational equipment includes up to four 175 hp, natural gas-powered cargo handling equipment, including

29 EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

30 South Coast Air Quality Management District (SCAQMD). 2021. *WAIRE Implementation Guidelines.* June. Website: https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/waire-implementation-guidelines.pdf#:~:text=The%20WAIRE%20Implementation%20Guidelines%20is%20a%20user%20guide,the%20document%20%28version%201.1%29%20reflects%20the%20following%20updates (accessed July 2025).

31 EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

a port tractor operating 4 hours per day for 365 days of the year. The on-site cargo handling equipment emissions were calculated off-model using CARB's California Emissions Factor Model (EMFAC) off-road emission factors.

The proposed Project was also conservatively assumed to include installation of two 300 hp diesel-powered emergency generators at the industrial buildings and one 350 hp diesel-powered emergency generator at the off-site lift station. The emergency generators were estimated to operate up to 1 hour per day, 1 day per week, up to 50 hours per year, for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency generators were calculated using CalEEMod.

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. Therefore, for modeling purposes, 48 one-way truck trips have the potential to include TRUs. TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on the EMFAC off-road emissions, developed by CARB. EMFAC does not provide emission rates per hour or mile as with the on-road emissions model and only provides emissions inventories. Emission results are produced in tons per day, while all activity, fuel consumption, and horsepower hours are reported at annual levels. The emissions inventory is based on specific assumptions, including the average horsepower rating of specific types of equipment and the hours of operation annually. The emissions inventory was converted into emission rates to calculate emissions from TRU operation.

Emissions estimates for operation of the Project, assuming compliance with all applicable rules (e.g., SCAQMD Rule 2305, CALGreen), were calculated using CalEEMod and are shown in Table 3.3.H.

The results shown in Table 3.3.H indicate that the proposed Project would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions; however, the daily emissions of NO_X would exceed the significance criteria for NO_X and mitigation would be required.

Implementation of **MM AQ-1** through **MM AQ-10** and **PDF AQ-1** through **PDF AQ-5** would incorporate strategies that would contribute to reducing heavy-duty truck emissions associated with the proposed Project. Although these mitigation measures would reduce criteria air pollutant emissions generated during operational activities associated with the proposed Project, these measures would provide emissions reductions that are not quantifiable. **MM AQ-1** through **MM AQ-10** and **PDF AQ-1** through **PDF AQ-5** include measures to reduce truck and other operational emissions to the extent feasible. In addition, trucks on site are required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling, resistant tires that would reduce fuel consumption and associated emissions.

NO_X impacts at the Project level are considered cumulatively significant because NO_X emissions are O_3 precursors and would therefore contribute considerably to existing O_3 nonattainment conditions within the SCAB. This is a cumulatively significant impact persisting over the life of the Project. O_3 concentrations are generally highest during the summer months, when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

Table 3.3.H: Project Operation Emissions

Source Category	Maximum Pollutant Emissions (lbs/day)					
	VOCs	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Summer						
Mobile-Source Emissions	8.50	77.34	125.68	0.90	43.93	13.93
Area-Source Emissions	30.13	0.37	43.53	0.00	0.08	0.06
Energy-Source Emissions	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Stationary-Source Emissions	1.56	4.36	3.98	0.01	0.23	0.26
TRU Emissions	13.80	14.87	1.68	0.00	0.50	0.46
On-Site Cargo Equipment	0.47	1.50	65.78	0.00	0.12	0.11
Total Project Emissions	**54.46**	**98.43**	**240.65**	**0.91**	**50.86**	**14.79**
SCAQMD Significance Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**
Winter						
Mobile-Source Emissions	8.19	81.09	105.81	0.88	49.94	13.93
Area-Source Emissions	22.98	0.00	0.00	0.00	0.00	0.00
Energy-Source Emissions	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01
Stationary-Source Emissions	1.56	4.36	3.98	0.01	0.23	0.23
TRU Emissions	13.80	14.87	1.68	0.00	0.50	0.46
On-Site Cargo Equipment	0.47	1.50	65.78	0.00	0.12	0.11
Total Project Emissions	**47.00**	**101.81**	**177.24**	**0.89**	**50.78**	**14.73**
SCAQMD Significance Threshold	55.0	55.0	550.0	150.0	150.0	55.0
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**No**	**No**

Source: Urban Crossroads. *Baker Lake Elsinore Air Quality Impact Analysis*. Table 3-8. June 3, 2025.
CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_X = sulfur oxides
VOCs = volatile organic compounds

NO_X consists of nitric oxide (NO), NO_2, and nitrous oxide (N_2O) and are formed when nitrogen combines with oxygen. Their lifespan in the atmosphere ranges from 1 to 7 days for NO and NO_2 to 170 years for N_2O. NO_X are typically created during combustion processes and are major contributors to smog formation and acid deposition (acid rain). Of the seven types of NO_X compounds, NO_2 is the most abundant in the atmosphere. As ambient concentrations of NO_2 are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO_2 than those indicated by regional monitors. NO_2 may result in adverse health effects.

Individuals exercising outdoors, children, and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered the most susceptible subgroups for O_3 effects. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. Elevated O_3 levels are associated with increased school absences. In recent years, a correlation between elevated ambient O_3 levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in communities with high O_3 levels. O_3 exposure under exercising conditions is known to increase the severity of the responses described above.

Exposure to NO_X may cause increases in resistance to air flow and airway contraction after short-term exposure in healthy subjects. Larger decreases in lung function are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sensitive groups. Other potential health effects may include increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions, and the effect may increase when exposure involves multiple air pollutants.

Both the State of California and the federal government have established health-based ambient air quality standards to protect the health and welfare of the populace with a reasonable margin of safety. However, the majority of NO_X emissions are derived from vehicle usage, and the proposed Project does not have regulatory authority to control tailpipe emissions. Although the proposed Project analysis above identifies that operational emissions associated with the proposed Project would exceed the SCAQMD's thresholds for NO_X, it should be noted that exceeding the SCAQMD's numeric regional mass daily thresholds does not necessarily correspond to a determination for health risk impacts to sensitive receptors. This is because the mass daily thresholds are in pounds per day emitted into the air, whereas health effects are determined based on the concentration of emissions in the air at a particular receptor (e.g., ppm by volume of air, or $\mu g/m^3$ of air).

As noted in the Brief of Amicus Curiae (Brief) by the SCAQMD in *Sierra Club v. County of Fresno* (Friant Ranch case), SCAQMD has among the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the State; thus, it is uniquely situated to express an opinion on how lead agencies should correlate air quality impacts with specific health outcomes.[32] As a responsible agency for air quality pursuant to CEQA, the SCAQMD receives 60 or more CEQA documents each month (approximately 500 per year) and provides comments on as many as 25 or 30 CEQA documents each month.[33] Therefore, the *Baker Lake Elsinore Air Quality Impact Analysis*[34] and the *Baker Lake Elsinore Construction and Operational Health Risk Assessment*[35] prepared for the proposed Project and this EIR rely on SCAQMD expertise, thresholds, and guidance to disclose the proposed Project's air quality impacts.

According to the SCAQMD, "SCAQMD staff does not currently know of a way to accurately quantify O_3-related health impacts caused by NO_X or VOC emissions from relatively small projects…On the other hand, this type of analysis may be feasible for projects on a regional scale with very high

[32] Brief for the South Coast Air Quality Management District as Amicus Curiae. 2015. *Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno and Friant Ranch, L.P.* After a Published Decision by the Court of Appeal filed May 27, 2014 (Fifth Appellate District Case No. F066798), Appeal from the Superior Court of California, County of Fresno (Case No. 11CECG00726). Page App-2. April 6.

[33] Ibid. Page 7.

[34] Urban Crossroads. 2025. *Baker Lake Elsinore Air Quality Impact Analysis*. June 3.

[35] Urban Crossroads. 2025. *Baker Lake Elsinore Construction and Operational Health Risk Assessment*. June 3.

emission of NO_X and VOCs, where impacts are regional."[36] The SCAQMD further stated, "… it takes a large amount of additional precursor emissions to cause a modeled increase in ambient O_3 levels over an entire region. For example, the SCAQMD's 2012 AQMP showed that reducing NO_X by 432 tons per day (157,680 tons/year) and reducing VOC by 187 tons per day (68,255 tons/year) would reduce O_3 levels at the SCAQMD's monitor site with the highest levels by only 9 parts per billion."[37]

The SCAQMD performed a health impact analysis in 2011 in which it was "able to correlate [a] very large emissions increase (e.g., 6,620 pounds per day of NO_X (1,208 tons per year), 89,180 pounds per day VOC (16,275 tons per year) to expected health outcomes from O_3 and particulate matter (e.g., 20 premature deaths per year and 89,947 school absences in the year 2030 due to O_3)."[38] As demonstrated in Table 3.3.H, above, operation of the proposed Project would generate up to 101.81 pounds per day of NO_X (1.5 percent of 6,620 pounds per day) and 54.46 pounds per day of VOC (0.1 percent of 89,180 pounds per day).[39] As such, it is not expected that the proposed Project would generate 6,620 pounds per day of NO_X or 89,190 pounds per day of VOC emissions. Therefore, emissions associated with the proposed Project are not sufficiently high enough to correlate health effects on a Basin-wide level.

Although Project-level NO_X emissions would contribute to existing O_3 nonattainment conditions within the SCAB, O_3 is a highly reactive and unstable gas that is formed when VOCs and NO_X, both byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight, which cannot be anticipated beyond a measure of a few weeks. As indicated in Table 3.3.H, the proposed Project would generate up to 101.81 pounds of NO_X per day. The proposed Project's daily NO_X emissions output would be approximately 1.5 percent[40] of the regional NO_X emissions disclosed in the SCAQMD's 2011 health impact analysis of a large regional project. Therefore, the proposed Project is considered a relatively small project, with emissions not sufficiently high enough to use a regional modeling program to correlate health effects on a Basin-wide level, "in part because ozone formation is not linearly related to emissions."[41] As such, individual health effects from exposure to NO_X emissions generated by the proposed Project would be small in scale and therefore speculative.

With implementation of **MM AQ-1** through **MM AQ-10** and **PDF AQ-1** through **PDF AQ-5** and the regulations implemented by the USEPA and CARB to improve truck efficiency, the long-term

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36 Brief for the South Coast Air Quality Management District as Amicus Curiae. 2015. *Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno and Friant Ranch, L.P.* After a Published Decision by the Court of Appeal filed May 27, 2014 (Fifth Appellate District Case No. F066798), Appeal from the Superior Court of California, County of Fresno (Case No. 11CECG00726). Page App-2. April 6.

37 Ibid. Page 11.

38 Ibid. Page 12.

39 To be conservative, the highest value for each pollutant is presented for either summer or winter.

40 Project emissions of 101.81 pounds of NO_X per day ÷ SCAQMD regional example of 6,620 pounds of NO_X per day = 1.5 percent.

41 Brief for the South Coast Air Quality Management District as Amicus Curiae. 2015. *Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno and Friant Ranch, L.P.* After a Published Decision by the Court of Appeal filed May 27, 2014 (Fifth Appellate District Case No. F066798), Appeal from the Superior Court of California, County of Fresno (Case No. 11CECG00726). Page 13. April 6.

operational NO_X emissions associated with the proposed Project would exceed the SCAQMD's regional significance thresholds and would cumulatively contribute to the nonattainment designations in the SCAB. The majority of the Project's operational-source NO_X emissions are generated by passenger cars and trucks accessing the Project. Neither the Project Applicant nor the City have regulatory authority to control tailpipe emissions. Therefore, operation of the proposed Project would result in a significant impact related to a cumulatively considerable net increase of a criteria pollutant for which the Project region is in nonattainment under an applicable NAAQS or CAAQS. Impacts would be **significant and unavoidable**.

Long-Term Microscale (CO Hot Spot) Analysis. Vehicular trips associated with the proposed Project would contribute to congestion at intersections and along roadway segments in the Project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, schoolchildren, the elderly, and hospital patients). Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable LOS or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended to determine a project's effect on local CO levels.

To establish a record of baseline CO concentrations affecting the SCAB, a CO hot-spot analysis was conducted in 2003 for four busy intersections in Los Angeles at the peak morning and afternoon time periods. A CO hot spot would occur if an exceedance of the State 1-hour standard of 20 parts per million (ppm) or the 8-hour standard of 9 ppm were to occur. The SCAB's 2003 hot-spot analysis did not identify any violation of CO standards. In addition, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour (vph), or 24,000 vph where vertical and/or horizontal air does not mix, in order to generate a significant CO impact.

An assessment of Project-related impacts on localized ambient air quality requires that future ambient air quality levels be projected. Ambient CO levels monitored at the Lake Elsinore monitoring station showed that the ambient 1-hour and 8-hour CO concentrations in 2023 were 1.3 ppm and 0.7 ppm, respectively (Table 3.3.D). The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

As described in the *Scoping Agreement for Traffic Impact Study,*[42] the intersection of Nichols Road and the southbound Interstate (I-)15 on-ramp would have the highest a.m. and p.m. traffic volumes (1,615 vph and 210 vph, respectively). As such, based on these traffic volumes and given the extremely low level of CO concentrations in the Project area, Project-related vehicles are not

[42] EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

expected to contribute significantly to or result in CO concentrations exceeding the State or federal CO standards. Impacts related to CO hot spots would be **less than significant**, and mitigation is not required.

Threshold 3.3.3: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. Sensitive receptors are defined as people who have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential dwelling units. The nearest sensitive receptors in proximity to the Project site is an existing residence located approximately 92 feet west of the Project site.

The following sections describe the potential impacts on sensitive receptors from construction and operation of the proposed Project.

Localized Impact Analysis. Based on SCAQMD's LST Methodology, emissions of concern during construction activities are NO_X, CO, $PM_{2.5}$, and PM_{10}. The LST Methodology states that off-site mobile emissions from the Project should not be included in the emissions compared to LSTs. Thus, for purposes of the construction LST analysis, only emissions included in the CalEEMod on-site emissions outputs were considered. In order to estimate localized pollutant concentrations resulting from Project construction, the SCAQMD-approved AERMOD dispersion model was utilized. In order to model worst-case conditions, the highest daily peak on-site emissions resulting from overlapping construction activity were modeled.

A ground-level release height and a 1-meter (approximately 3.28 feet) initial vertical dimension (sigma z) were utilized for fugitive dust emissions of PM_{10} and $PM_{2.5}$, consistent with SCAQMD's LST guidance. In order to account for equipment exhaust emissions from NO_2, CO, PM_{10}, and $PM_{2.5}$, a release height of 5 meters was utilized, consistent with SCAQMD's LST guidance. In addition, to account for meteorological conditions at the Project site, meteorological data from the SCAQMD's Lake Elsinore monitoring station were utilized, as this is the nearest station to the Project site for which meteorological data is available. Additionally, a receptor height of 2 meters and regulatory default options were utilized consistent with SCAQMD's LST guidance.

Localized air quality impacts were evaluated at sensitive receptor land uses nearest the Project site. As discussed above, the nearest sensitive receptor in proximity to the Project site is an existing residence located approximately 92 feet west of the Project site. The results of the LST analysis, summarized in Table 3.3.I, indicate that the proposed Project would not result in an exceedance of SCAQMD LSTs during Project construction. Thus, localized construction emissions would be less than significant.

Table 3.3.I: Construction Localized Impacts Analysis

Emissions Source	Pollutant Emissions[1]				
	NO_2	CO		PM_{10}	$PM_{2.5}$
Averaging Time	**1-Hour**	**1-Hour**	**8-Hour**	**24-Hour**	**24-Hour**
Peak Day Localized Emissions	0.01	0.02	0.00	0.49	0.24
Background Concentration[2,3]	0.04	1.3	0.70	-	-
Total Concentration	**0.05**	**1.32**	**0.70**	**0.49**	**0.24**
SCAQMD Localized Significance Threshold	0.18	20.0	9.0	10.4	10.1
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 3-9 (June 3, 2025).
Notes:
[1] PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m^3. All others are expressed in ppm.
[2] The highest concentration from the last 3 years of available data.
[3] Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO_2.
CO = carbon monoxide
lbs/day = pounds per day
NO_2 = nitrogen dioxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District

For purposes of the operational analysis, and as identified above, the LST analysis generally includes on-site sources, including emissions associated with area, energy, mobile, and on-site cargo handling equipment sources. However, the CalEEMod outputs do not separate on-site and off-site emissions from mobile sources. As such, to identify the maximum potential impact, the modeled emissions include all on-site Project-related area sources and on-site Project-related mobile emissions. In order to account for on-site mobile emissions, a trip length of 0.65 mile was utilized for both trucks and passenger cars. In addition, to account for any potential impacts to on-site receptors as a result of operational activity, a scenario conservatively assuming 2027 emissions was analyzed. As shown in Table 3.3.J, operational localized emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed receptors. Thus, localized operational emissions would be less than significant.

Table 3.3.J: Operational Localized Impacts Analysis

Emissions Source	Pollutant Emissions[1]				
	NO_2	CO		PM_{10}	$PM_{2.5}$
Averaging Time	**1-Hour**	**1-Hour**	**8-Hour**	**24-Hour**	**24-Hour**
Peak Day Localized Emissions	<0.01	0.02	0.02	0.21	0.12
Background Concentration[2,3]	0.04	1.3	0.07	-	-
Total Concentration	**0.05**	**1.32**	**0.72**	**0.21**	**0.12**
SCAQMD Localized Significance Threshold	0.18	20.0	9.0	10.4	10.1
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**

Source: Urban Crossroads, *Baker Lake Elsinore Air Quality Impact Analysis*, Table 3-10 (June 3, 2025).
Notes:
[1] PM_{10} and $PM_{2.5}$ concentrations are expressed in µg/m^3. All others are expressed in ppm.
[2] Highest concentration from the last three years of available data.
[3] Based on SCAQMD's LST Methodology, background concentrations are considered only for CO and NO_2.
CO = carbon monoxide
lbs/day = pounds per day
NO_2 = nitrogen dioxide
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District

Toxic Air Contaminants. To determine the potential health risk to people living and working near the proposed Project associated with the exhaust of diesel-powered trucks and equipment, an HRA[43] was prepared for the proposed Project that is included in Appendix C-2. For the purposes of an HRA, short-term emissions are of concern for analyzing acute health impacts, and long-term emissions are of concern for analyzing chronic and carcinogenic health impacts. A screening-level multi-pathway assessment has been conducted. This technique was chosen as recommended in the Office of Environmental Health Hazard Assessment (OEHHA) *Air Toxic Hot Spots Program Risk Assessment Guidelines*.[44]

The HRA was conducted using three standard models: (1) CARB's EMFAC model, Version 2021 (EMFAC2021)[45] for vehicle emissions factors and percentages of fuel type within the overall vehicle fleet; (2) the USEPA's AERMOD air dispersion model[46] to determine how the TACs would move through the atmosphere after release from sources both on site and along truck routes; and (3) CARB's HARP model to translate the pollutant concentrations from AERMOD into individual health risks at the nearby sensitive receptor locations.

The HRA includes analyzing the inhalation, dermal soil, mother's milk, and homegrown produce pathways. This technique was chosen as prescribed in SCAQMD's *AB 2588 and Rule 1402 Supplemental Guidelines*.[47]

The OEHHA has determined that long-term exposure to diesel exhaust particulates poses the highest cancer risk of any TAC it has evaluated. Exposure to diesel exhaust can also have immediate health effects. Diesel exhaust can irritate the eyes, nose, throat, and lungs, and it can cause coughs, headaches, lightheadedness, and nausea. In studies with human volunteers, DPM made people with allergies more susceptible to the materials to which they are allergic, such as dust and pollen. Exposure to diesel exhaust also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. For risk assessment procedures, the OEHHA specifies that the surrogate for whole diesel exhaust is DPM.

The conservative nature of this analysis is due primarily to the following factors:

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43 Urban Crossroads. 2025. *Baker Lake Elsinore Construction and Operational Health Risk Assessment*. June 3.

44 California Environmental Protection Agency (CalEPA) Office of Environmental Health Hazard Assessment (OEHHA). 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. March. Website: https://oehha.ca.gov/air/air-toxics-hot-spots (accessed June 2025).

45 California Air Resources Board (CARB). MSEI – Modeling Tools, Emissions Factor Model, Version 2021 (EMFAC2021). Website: www.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools (accessed June 2025).

46 United States Environmental Protection Agency (USEPA). AERMOD Modeling System. Website: www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models (accessed June 2025)

47 South Coast Air Quality Management District (SCAQMD). 2024. *AB2588 and Rule 1402 Supplemental Guidelines*. September. Website: https://www.aqmd.gov/docs/default-source/planning/risk-assessment/forms-and-guidelines/ab-2588-supplemental-guidelines-2024.pdf?sfvrsn=6 (accessed June 2025).

- The CARB-adopted diesel exhaust unit risk factor (URF) of 300 in 1 million per µg/m^3 is based on the upper 95th percentile of estimated risk for each of the epidemiological studies used to develop the URF. Therefore, the risk factor is already representative of the conservative risk posed by DPM.

- The emissions derived assume that every truck accessing the Project site will idle for 15 minutes.

Improvements to diesel fuel and diesel engines, as required by the Truck and Bus Regulation,[48] have resulted in lower emissions of some of these TACs. These improvements resulted in a 75 percent reduction in particle emissions from diesel-powered trucks and other equipment in 2010 and an 85 percent reduction by 2020 as compared to 2000 levels.[49] These improvements are anticipated to continue into the foreseeable future. Electric trucks are also on the horizon and, once in use, would eliminate the emissions of DPM.

Construction Health Risk Assessment. A construction HRA, which evaluates construction-period health risk to the surrounding off-site existing receptors, was performed for construction of the proposed Project, including the Onsite Development Area and Offsite Improvement Area. To estimate the potential cancer risk associated with construction of the proposed warehouses from equipment exhaust (including DPM), a dispersion model was used to translate an emission rate from the source location to a concentration at the existing receptor location of interest (i.e., surrounding residences, schools, and worksites). Dispersion modeling varies from a simpler, more conservative screening-level analysis to a more complex and refined detailed analysis. This refined assessment was conducted using the CARB exposure methodology, with the air dispersion modeling performed using the USEPA's AERMOD dispersion model. The model provides a detailed estimate of exhaust concentrations based on site and source geometry, source emissions strength, distance from the source to the receptor, and meteorological data.

Table 3.3.K, below, identifies the results of the analysis at the MEI. Based on the results of the analysis, the receptor with the greatest potential exposure to Project construction-source DPM emissions is an existing residence located approximately 155 feet east of the Project site.

Table 3.3.K: Project Construction Health Risk Levels for Nearby Residents

Location	Maximum Cancer Risk	Maximum Noncancer Chronic Risk (Hazard Index)	Maximum Noncancer Acute Risk (Hazard Index)
Residential MEI Risk Levels	1.35	<0.01	<0.01
SCAQMD Significance Threshold	**10.0 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Urban Crossroads, *Baker Lake Elsinore Construction and Operational Health Risk Assessment*, Table ES-1 (June 3, 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

[48] California Air Resources Board (CARB). 2019. Truck and Bus Regulation Compliance Requirement Overview. June 18. Website: www.arb.ca.gov/msprog/onrdiesel/documents/fsregsum.pdf (accessed June 2025).

[49] Office of Environmental Health Hazard Assessment (OEHHA). 2001. *Health Effects of Diesel Exhaust.* May 21. Website: oehha.ca.gov/air/health-effects-diesel-exhaust (accessed June 2025).

As shown in Table 3.3.K, the maximum cancer risk at the residential receptor MEI would be 1.35 in 1 million, less than the threshold of 10 in 1 million. The chronic and acute health risks at the residential receptor MEI would be 0.001, which is well below the SCAQMD threshold of 1.0. Therefore, construction of the proposed Project would not exceed SCAQMD thresholds and would not expose nearby existing residential receptors to substantial pollutant concentrations. Impacts would be **less than significant**.

Operational Health Risk Assessment. The first step of an HRA is to characterize the Project-related emissions of TACs. According to the TIA, the proposed Project would generate a total of 2,384 total trips per day, consisting of 1,400 passenger car trips and 984 truck trips.

While the TAC emissions from gasoline-powered vehicles have a small health effect compared to DPM, this HRA includes all the traffic information described and both gasoline- and diesel-powered vehicle emissions. For the diesel exhaust emissions, it is sufficient to only consider the DPM (PM_{10} and $PM_{2.5}$) portion of the exhaust; all the TACs for the gasoline exhaust emissions are contained in the ROG emissions. Using speciation data from CARB,[50] the emission rates of the TAC components in gasoline exhaust are derived from the total ROG emissions. The TAC components of the gasoline vehicle ROG exhaust are 1,3-butadiene, benzene, ethylbenzene, methyl ethyl ketone (MEK), naphthalene, propylene, styrene, toluene, and xylenes.

The trucks would operate in two modes: stationary idling and moving on and off the Project site. The emissions from trucks while idling result in a much higher concentration of TACs at any nearby sensitive receptors compared to the emissions from moving trucks. This is due to the dispersion of emissions that occurs with distance and with travel of the vehicle. The HRA assumed vehicles traveling on site would maneuver slowly, averaging approximately 5 miles per hour (mph), and that vehicles traveling on roadways would average 25 mph. Although the trucks will spend time at higher speeds, their emissions are greater at lower speeds, so using 5 and 25 mph results in a conservative analysis.

For the moving emissions, each roadway was modeled as a line source (made up of multiple adjacent volume sources as opposed to a single point source) per standard procedure. The DPM emission rate for each line volume source was calculated by multiplying the emission factor (based on the average travel speed along the roadway) by the number of trips and the distance traveled along each roadway segment. On-site truck idling was estimated to occur at building loading docks as well as in truck trailer parking areas. Although the Project's diesel-fueled truck and equipment operators will be required by State law to comply with CARB's idling limit of 5 minutes, SCAQMD recommends that the on-site idling emissions be calculated assuming 15 minutes of truck idling. As such, this analysis calculates truck idling at 15 minutes, consistent with SCAQMD's recommendation. An idling duration of 5 minutes was assumed for the truck trailer parking portions of the Project. Idling emissions at building loading docks were modeled in AERMOD as line sources, which consist of multiple adjacent volume sources.

[50] California Air Resources Board (CARB). Speciation Profiles Used in ARB Modeling. Website: www.arb.ca.gov/ei/speciate/speciate.htm (accessed June 2025).

EMFAC2021 was used to determine the emissions factors of idling and operating diesel trucks to determine the total emissions of PM_{10}. Although the TAC of concern from diesel trucks is DPM, EMFAC2021 does not include emissions factors for DPM. DPM is a component of the overall exhaust from the Project-related trucks. This HRA conservatively assumes the DPM emissions to be equal to the PM_{10} emissions when the DPM is actually only a portion of the overall PM_{10} in the truck exhaust. While it is expected that the truck emissions rate will continue to reduce over time, an HRA only allows for a single emission rate to represent the entire 30-year exposure period. The use of emissions factors for the earliest year the proposed Project could start operations (2027) was selected for this HRA to be conservative.

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. For modeling purposes, a total of 95 two-way truck trips have been estimated to include TRUs. TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on CARB's OFFROAD Model, Version 2021 (OFFROAD2021).

In addition, the three emergency generators would be diesel-fueled and would potentially result in exposure of sensitive receptors to DPM. Consistent with SCAQMD guidance, the emergency generators were modeled as a point source.

The carcinogenic and chronic health risks from the proposed Project are shown in Table 3.3.L. The residential MEI with the greatest potential exposure to Project operational-source DPM emissions is approximately 92 feet east of the Project site. The worker receptor MEI is approximately 1,890 feet northeast of the Project site, and the school receptor MEI is Temescal Valley High School, approximately 2,347 feet northeast of the Project site. The residential risk incorporates both the risk for a child living in a nearby residence for 9 years (the standard period of time for child risk) and an adult living in a nearby residence for 30 years (considered a conservative period of time for an individual to live in any one residence).

Table 3.3.L: Project Operation Health Risk Levels for Nearby Residents and Workers

Location	Maximum Cancer Risk	Maximum Noncancer Chronic Risk (Hazard Index)	Maximum Noncancer Acute Risk (Hazard Index)
Residential MEI Risk Levels	5.95	0.01	0.01
Worker MEI Risk Levels	0.54	<0.01	<0.01
School MEI Risk Levels	0.17	<0.01	<0.01
SCAQMD Significance Threshold	**10.0 in 1 million**	**1.0**	**1.0**
Significant?	**No**	**No**	**No**

Source: Urban Crossroads, *Baker Lake Elsinore Construction and Operational Health Risk Assessment*, Table ES-2 (June 3, 2025).
MEI = maximally exposed individual
SCAQMD = South Coast Air Quality Management District

As shown in Table 3.3.L, the MEI inhalation cancer risk associated with the proposed Project would be 5.95 in 1 million at the residential receptor MEI, 0.54 in 1 million at the worker receptor MEI, and 0.17 in 1 million at the school receptor MEI. In addition, as shown in Table 3.3.L, the chronic and acute health risks would be 0.01 at the residential receptor MEI and less than 0.01 at the

worker receptor MEI and school receptor MEI, which would all be below the threshold of 1.0. Therefore, operation of the proposed Project would not exceed SCAQMD thresholds and would not expose nearby existing residential receptors to substantial pollutant concentrations. Impacts would be **less than significant**.

Additionally, results of the HRA determined that the combined maximum incremental cancer risk associated with Project construction and operational DPM emissions at the MEI would be 4.20 in 1 million, which is below the threshold of 10 in 1 million. The chronic and acute health risks would be 0.01, which would not exceed the threshold of 1.0.[51] As these results show, all health risk levels to nearby receptors from Project-related emissions of TACs from construction and operation of the proposed Project would be below the SCAQMD's HRA thresholds. As such, health risk impacts related to the exposure of sensitive receptors to substantial pollutant concentrations would be **less than significant**. Mitigation is not required.

Threshold 3.3.4: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. Land uses generally associated with odor complaints include agricultural uses (livestock and farming); wastewater treatment plants; food processing plants; chemical plants; composting operations; refineries; landfills; dairies; and fiberglass molding facilities. The proposed Project does not contain land uses typically associated with emitting objectionable odors.

Construction. Project construction would generate limited odors over the short term, primarily from equipment exhaust. The painting of buildings and structures or the installation of asphalt surfaces may also create odors. However, construction activity would be temporary and would cease after individual construction is completed. Additionally, construction activities that would generate odors are expected to be isolated to the immediate vicinity of the construction site.

Additionally, the Project Applicant would be required to implement standard control measures to limit fugitive dust and construction equipment emissions, which would reduce odors, in accordance with the following regulations:

- **SCAQMD Rule 402:** A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; which endanger the comfort, repose, health or safety of any such persons or the public; or which cause, or have a natural tendency to cause, injury or damage to business or property.

- **SCAQMD Rule 403:** Requires that fugitive dust be controlled with best available control measures so the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Implementation of dust suppression techniques is also

[51] Urban Crossroads. 2025. *Baker Lake Elsinore Construction and Operational Health Risk Assessment*. June 3. Table ES-3.

required to prevent fugitive dust from creating a nuisance off site. Applicable dust suppression techniques include the following:

- Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.
- Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind-driven fugitive dust, must have an application of water at least twice per day to at least 80 percent of the unstabilized area.
- All trucks hauling dirt, sand, soil, or other loose materials are to be covered or maintain at least 2 feet of freeboard in accordance with the requirements of California Vehicle Code Section 23114 (freeboard means vertical space between the top of the load and top of the trailer).
- Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.

- **Title 13, Section 2449(d)(2) of the California Code of Regulations:** Requires operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 hp and up that were not designed to be driven on road) to limit vehicle idling to 5 minutes or less.

The Project Applicant would also be required to comply with SCAQMD Rule 1113, which limits the VOC content of architectural coatings (e.g., paint), and SCAQMD Rule 1108, which identifies standards regarding the application of asphalt. Adherence to the standards identified in SCAQMD Rules 1113 and 1108 is required for all construction projects in the city to reduce emissions and objectionable odors.

Adherence to the SCAQMD rules identified above and CCR Title 13, Section 2449(d)(2), would reduce odor impacts to people on or near the Project site during construction. Additionally, as previously discussed, construction activities would be temporary, and odors generated from construction activities would be isolated to the immediate vicinity of the construction site. Therefore, Project construction activities would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be **less than significant**, and mitigation is not required.

Operation. Land uses generally associated with long-term objectionable odors include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. The proposed warehouse buildings are not expected to include uses that would generate long-term objectionable odors. In addition, it is expected that Project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with current solid waste regulations. Therefore, operation of the proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. Impacts would be **less than significant**, and mitigation is not required.

3.3.7 Level of Significance Prior to Mitigation

The following potential air quality impacts would be less than significant prior to mitigation: (1) construction air quality impacts; (2) CO hot-spot impacts; (3) localized impacts; (4) exposure of sensitive receptors to substantial pollutant concentrations during Project construction and operation; and (5) odors. Operational air quality impacts would be potentially significant prior to mitigation.

3.3.8 Project Design Features and Mitigation Measures

3.3.8.1 Project Design Features

The following PDFs would be incorporated as part of the Project design.

PDF AQ-1 **Truck Parking.** The Project shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and on-site queuing for trucks that is away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public road right-of-way or nearby residential areas.

PDF AQ-2 **Driveways.** The proposed truck driveways are placed on streets that do not have fronting sensitive receptors.

PDF AQ-3 **Screening.** The Project sites shall be densely screened with landscaping along all bordering streets and site boundaries, with trees spaced no further apart than 25 feet on center. Fifty percent of the landscape screening shall include a minimum of 36-inch box trees as feasible. Truck courts would be further screened from the right-of-way by screen walls. Facility operators will be responsible for establishing a long-term maintenance mechanism to ensure that the landscaping remains in place and functional in accordance with the approved landscaping plan.

PDF AQ-4 **Rideshare and Commute Trip Reduction Program.** Upon exceedance of 250 employees, facility operations will establish a rideshare and commute trip reduction program, such as IE Commuter, in accordance with South Coast Air Quality Management District (SCAQMD) Rule 2202, with the intent of discouraging single-occupancy vehicle trips and promoting alternate modes of transportation, such as carpooling and transit, where feasible.

PDF AQ-5 **Signage.** Prior to receipt of occupancy permits, the Project Developer/Owner/Operator shall post signs that all parking of trucks must be within designated on-site areas and not within the surrounding community or public streets.

3.3.8.2 Mitigation Measures

The following mitigation measures shall be implemented by the proposed Project.

MM AQ-1 **Electrification.** To facilitate the future installation of infrastructure that would charge the batteries powering the motors of electric-powered trucks, the City Planning Department shall ensure that the following provisions are met:

1. Prior to the receipt of occupancy permits, an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric-powered trucks; Conduit shall be installed from this designated area where the panel would be located to the on-site location where the charging facilities would be and where electric-powered trucks would park and connect to charging facilities to charge the batteries powering the motors of the electric trucks.

2. Prior to the receipt of occupancy permits, tenants that plan to operate electric trucks would be required to construct electrical charging infrastructure in addition to the required conduits.

MM AQ-2 **Electric Vehicle Charging Stations and Designated Carpool Parking Stalls.** Prior to the receipt of occupancy permits, the Project shall install passenger car electric vehicle (EV) charging stations and designated carpool parking stalls per the provisions of the California Green Building Standards Code and require that each building be constructed with an adequately sized electrical panel(s) and conduit to accommodate EV charging stations at a minimum of 5 percent of the passenger car parking spaces.

MM AQ-3 **Alternative Fuels.** In order to promote alternative fuels and help support "clean" truck fleets, the developer/successor-in-interest shall provide building occupants with information related to the South Coast Air Quality Management District's (SCAQMD) Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, and California Air Resources Board (CARB) regulations. Tenants shall be notified about the availability of: (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; (3) access to alternative fueling stations proximate to the site that supply compressed natural gas; and (4) the United States Environmental Protection Agency's SmartWay program.

MM AQ-4 **Idling Regulations.** Prior to issuance of a certificate of occupancy, legible, durable, weatherproof signs shall be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations. At a minimum, each sign shall include the following instructions for truck drivers to shut off engines when not in use:

1. Instructions for drivers of diesel trucks to restrict idling to more than 5 minutes once the vehicle is stopped, the transmission is set to "neutral" or "park," and the parking brake is engaged.

2. Telephone numbers of the building facilities manager and CARB to report violations.

MM AQ-5 **Truck Fleet Operations.** All future operations shall adhere to the following:

1. The site shall have clearly marked entry and exit points for trucks and service vehicles.

2. Facility operators shall maintain records of their fleet equipment owned by the facility and ensure that all diesel-fueled medium-heavy-duty (MHD) trucks and heavy-heavy-duty (HHD) trucks use year 2010 or newer engines. The records should be maintained on site and made available for inspection by the lead agency.

3. Facility operators shall train their managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.

4. Signs should be posted in the appropriate locations and/or handouts should be provided that show the locations of nearest food options, fueling, truck maintenance services, and other similar convenience services.

5. Each facility shall designate a compliance officer responsible for implementing the measures described herein and/or in the Project conditions of approval and mitigation measures. Contact information shall be provided to the City and updated annually, and signs shall be posted in visible locations providing the contact information for the compliance officer to the surrounding community. The compliance officer also shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.

6. Signs shall be posted in the appropriate locations directing heavy truck drivers to park and perform any self-maintenance of trucks in designated on-site areas and not within the surrounding community or on public streets.

7. The Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route.

MM AQ-6 **Electric Vehicle Charging and Future Truck Charging Capability.** Prior to issuance of building permits, the following features shall be demonstrated on the Project's building plans to the extent feasible over minimum California Code of Regulations (CCR) Title 24 requirements. Installation shall be verified by the City prior to issuance of a certificate of occupancy.

1. For use by employees and visitors conducting business at the building, install automobile EV charging stations at the minimum number required by CCR Title 24. All charging stations shall be equipped with Level 2 or faster chargers. Signs shall be posted indicating that the charging stations are for exclusive use by the building's employees and by visitors conducting business at the building.

2. Install appropriate electrical infrastructure sufficiently sized to accommodate the potential installation of additional auto and truck EV charging stations in the future.

3. Install raceways for conduit to tractor-trailer parking areas in logical, gated locations determined by the Project Applicant during construction document plan check, for the purpose of accommodating the future installation of EV truck charging stations at such time this technology becomes commercially available. The charging station location(s) are to be located inside the gated and secured truck courts.

MM AQ-7 **Water-Efficient Fixtures.** All water fixtures within the Project shall be water efficient (toilets/urinals using 1.5 gallons per minute [gpm] or less, showerheads using 2.0 gpm or less, and faucets using 1.28 gpm or less).

MM AQ-8 **City Review of Construction Documents.** Prior to issuance of building permits, the following features shall be demonstrated on the Project's building and landscape plans to the extent feasible. Installation shall be verified by the City prior to issuance of a certificate of occupancy:

1. Install Energy Star-rated heating, cooling, lighting, and appliances.

2. Structures shall be equipped with outdoor electric outlets in the front and rear to facilitate use of electrical lawn and garden equipment.

MM AQ-9 **Tenant Lease Agreement.** Prior to issuance of a certificate of occupancy, the following language shall be included within tenant lease agreements in order to reduce operational air pollutant emissions to the extent feasible:

1. Information about energy efficiency, energy-efficient lighting and lighting control systems, energy management, and existing energy incentive programs.

2. Information about funding opportunities, such as the Carl Moyer Program, that provide incentives for using cleaner-than-required engines and equipment.

3. Requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site at such time this technology becomes commercially available. This requirement shall apply to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.

4. Requirements to use exclusively zero-emission light and medium-duty delivery trucks and vans once such trucks are widely commercially available as reasonably determined by the Lake Elsinore Planning Division. Zero-emission light and medium-duty trucks (EV) shall ordinarily be considered widely commercially available if the vehicle is capable of serving the intended purpose and is widely available for purchase for less than 125% the cost of a Class 7 or 8 light or medium-duty combustion-engine truck meeting the emissions standards in place at the time the comparison is made (model year 2014 or later emissions standards). In order to be capable of serving the intended purpose, the EV must be able to perform the same function as a comparable combustion engine vehicle (miles traveled on a full tank/charge, access to fueling/charging infrastructure, load capacity, climbing ability, performance in different climates). For the purpose of this cost comparison, "cost" shall mean the total vehicle cost for the first five (5) years of ownership, including any purchase incentives, rebates, and fuel and electricity costs. Any comparison must be like-for-like, i.e., must compare an EV with a new production combustion engine truck of the same class and substantially similar trim level that is widely available for purchase and immediate delivery in the area of the Project at the time the comparison is made.

5. Requirements to operate in compliance with, and monitor compliance with, all current and applicable air quality regulations for on-road trucks, including the CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program, and Statewide Truck and Bus Regulation.

6. Requirements and identification of the responsible party to maintain and replace rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed Project would comply with existing solar requirements of the California Energy Code in effect during permitting of the Project (at the time of construction drawing plan check submittal). In the event the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed

Project would be required to meet the CCR Title 24 energy efficiency standards in effect during permitting of the proposed Project.

7. Requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weatherproof signs that were installed at initial building occupancy placed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations.

8. The tenant agreement shall include notification that the tenant shall comply with CARB Truck and Bus regulation, including requirements that only haul trucks meeting model year 2010 engine emission standards shall be used for the on-road transport of materials to and from the Project site.

9. Requirements for the building owner to provide a Green Cleaning Products and Paint Education Program available to the building tenant, to keep at the building's office, break room, or leasing space, or on an accessible website.

MM AQ-10 **Truck Emissions.** The City's occupancy permitting shall require that all facility-owned and operated fleet equipment with a gross vehicle weight rating greater than 14,000 pounds accessing the site meet or exceed 2014 model-year emissions equivalent engine standards as currently defined in CCR Title 13, Division 3, Chapter 1, Article 4.5, Section 2025. Facility operators that own vehicles subject to Section 2025 shall maintain records on site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and State upon request.

3.3.9 Level of Significance after Mitigation

The results shown in Table 3.3.H indicate that the proposed Project would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions; however, the daily emissions of NO_X would exceed the significance criteria for NO_X and mitigation would be required. Implementation of **MM AQ-1** through **MM AQ-10** and **PDF AQ-1** through **PDF AQ-5** would incorporate strategies that would contribute to reducing emissions, including those from heavy-duty truck emissions associated with the proposed Project. Although these mitigation measures would reduce criteria air pollutant emissions generated during operational activities associated with the proposed Project, these measures would provide emissions reductions that are not quantifiable. With implementation of **MM AQ-1** through **MM AQ-10** and **PDF AQ-1** through **PDF AQ-5**, emissions associated with operation of the proposed Project would remain above the SCAQMD significance thresholds. Therefore, impacts would remain **significant and unavoidable**.

3.3.10 Cumulative Impacts

As defined in the *State CEQA Guidelines*, cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future

projects within the cumulative impact area for air quality. The cumulative impact area for air quality related to the proposed Project is the SCAB. Each project in the SCAB is required to comply with SCAQMD rules and regulations and is subject to independent review.

The SCAB is currently designated nonattainment for the federal and State standards for O_3 and $PM_{2.5}$. In addition, the SCAB is in nonattainment for the PM_{10} standard. The SCAB's nonattainment status is attributed to the region's development history. Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

In developing thresholds of significance for air pollutants, the SCAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

Therefore, if the proposed Project's annual emissions of construction- or operations-related criteria air pollutants exceed any applicable threshold established by the SCAMQD, the proposed Project would result in a considerable contribution to a cumulatively significant impact.

As discussed under Threshold 3.3.2, above, construction emissions associated with the proposed Project would not exceed the SCAQMD thresholds for VOCs, CO, SO_X, $PM_{2.5,}$ or PM_{10} emissions. The results shown in Table 3.3.H indicate that operation of the proposed Project would not exceed the significance criteria for daily VOCs, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions; however, the daily emissions of NO_X would exceed the significance criteria and mitigation would be required. Even with the implementation of **MM AQ-1** through **MM AQ-10** and **PDF AQ-1** through **PDF AQ-5**, operational impacts of NO_X emissions would exceed SCAQMD thresholds. Therefore, air quality emissions associated with the proposed Project could result in cumulatively considerable impacts, even with the implementation of mitigation. Cumulative impacts would be **significant and unavoidable**.

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3.4 BIOLOGICAL RESOURCES

This section evaluates the potential impacts to biological resources that may result from construction and operation of the proposed Project. The analysis contained in this section is based on the following project-specific technical reports and existing resource documents:

- Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* September 2 (Appendix D-1).

- Glenn Lukos Associates, Inc. 2024. Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas and Vernal Pools, and Narrow Endemic/Criteria Area Plants for the Baker Industrial Project. February 28. Revised March 6, 2025, May 14, 2025, and July 3, 2025 (Appendix D-2).

- *JPR 24-05-03-01 (LEAP 2023-04/Baker Street Industrial Project) Findings Complete 07.31.2025. Email from Breanna Machuca (California Department of Fish and Wildlife) to Damaris Abraham (City of Lake Elsinore).* Received October 2, 2025 (Appendix D-3).

3.4.1 Scoping Process

The City of Lake Elsinore (City) received four comment letters related to biological resources during the public review period of the Notice of Preparation (NOP). For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Environmental Impact Report (EIR).

- The California Department of Fish and Wildlife (CDFW), August 14, 2024, recommending an assessment of the flora and fauna within and adjacent to the Project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats; a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the Project; a discussion of alternatives, including the "No Project" Alternative; inclusion of an objective for the Project to be consistent with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP); identification of mitigation measures and alternatives that are appropriate and adequate to avoid or minimize potential impacts, to the extent feasible; identification of the specific Area Plan and Area Plan Subunit within which the Project is located, and the associated Planning Species and Biological Issues and Considerations that may apply to the Project; inclusion of an analysis of edge effects related to Project construction and operation, such as noise, lighting, trespass, and toxics, and that Project-specific mitigation measures to avoid and minimize any effects be included; determination if any portion of the Project would occur on Stephens' kangaroo rat (*Dipodomys stephensi*; SKR) habitat; and compliance with the Lake and Streambed Alteration program.

- California Native Plant Society (CNPS) Riverside-San Bernardino Chapter, August 10, 2024, requesting that vegetation mapping follow *The Manual of California Vegetation, Second Edition*, include a thorough analysis of impacts to rare plants known to occur on site, and provide recommendations for a project alternatives analysis.

- The Endangered Habitats League (EHL), July 15, 2024, requesting an analysis evaluating the Project's consistency with the MSHCP and a thorough alternatives analysis to determine if there are less biologically sensitive sites available.

- Jefrey Ong, July 10, 2024, expressing concerns regarding the potential for air and noise pollution associated with the proposed Project to harm local wildlife.

- Briana Sara and Elliot Ruhland, August 19, 2024, expressing concerns regarding the Project's encroachment into natural habitats, thereby threatening local plants and wildlife.

3.4.2 Methodology

This section describes the methods used to evaluate biological resources and associated impacts and presents the California Environmental Quality Act (CEQA) criteria used to evaluate the impacts. All proposed development occurs in areas not described for conservation or consists of off-site street improvements (not consisting of road widening) within an existing developed roadway. The Project consists of four elements: (1) proposed warehouse buildings (Onsite Development Area); (2) street and utility improvements (Offsite Improvement Area); (3) a proposed Construction/Improvements Buffer along Baker Street; and (4) and proposed Regional Conservation Authority (RCA) Conserved Lands (Restoration Area). These project elements, except the 33.65 acres of Restoration Area, are considered part of the development footprint for purposes of evaluating impacts to biological resources.

For the purpose of this analysis, a special-status species is one that meets one or more of the following criteria: listed or considered for listing or proposed for listing under the Federal Endangered Species Act (FESA) or California Endangered Species Act (CESA); CDFW Species of Special Concern, Fully Protected Species, or Watch List Species; and/or listed as having a California Rare Plant Rank (CRPR) of 1 or 2.[1]

This section also evaluates the proposed Project's consistency with applicable habitat conservation plans (HCPs), specifically the MSHCP, and relevant policies. Under this approach, a policy or program conflict is not in and of itself considered a significant environmental impact. An inconsistency between the proposed Project and an applicable plan is a legal determination that may or may not indicate the likelihood of an environmental impact. In some cases, an inconsistency may result in an underlying physical impact that is significant and would require mitigation.

As noted above, the proposed Project consists of four elements: (1) proposed warehouse buildings and associated drive aisles, parking, and loading areas (Onsite Development Area); (2) street and utility improvements (Offsite Improvement Area); (3) a proposed Construction/Improvements Buffer along Baker Street; and; (4) and proposed RCA Conserved Lands (Restoration Area). These project elements, except the 33.65 acres of Restoration Area, are considered part of the development footprint for purposes of evaluating impacts to biological resources.

[1] See California Code Regulations Title 14, Section 15380.

As noted in Table 3.4.A, the acreage of off-site improvements identified in Section 2.0, Project Description, of this EIR is greater than that referenced in the *Biological Technical Report for the Baker Industrial Project* (Appendix D-1). This discrepancy is due to the inclusion of approximately 4.03 acres of existing roadway within the off-site improvements, which did not require biological surveys.

Table 3.4.A: Project Element Acreages in the Methodology Discussion

EIR Project Description Nomenclature of Project Areas	Biological Technical Report Nomenclature of Project Areas
65.81 acre Onsite Development Area	65.81 acre Industrial Project (on site)
37.86 acre Offsite Improvement Area	6.11 acre Baker Street Improvements (off site) 27.70 acre Additional Street Improvements (off site)
33.65 acre Restoration Area	33.66 acre RCA Conserved Lands (on site)
2.72 acre Construction/Improvements Buffer	2.73 acre City Maintenance Area along Baker Street (off site)
Total: 140.04 acres	**Total: 136.01 acres**

Source: Email from Heather Roberts (EPD Solutions, Inc.) received September 22, 2025.
EIR = Environmental Impact Report RCA = Regional Conservation Authority

3.4.2.1 Habitat Assessment and Biological Surveys

The evaluation of biological resources as part of a habitat assessment of the Project site included literature review and pedestrian field surveys of the Project site conducted by Glenn Lukos Associates, Inc. (GLA). The field surveys, including transect surveys for plant and wildlife species, were conducted on site and augmented with information from databases and other resources.[2]

As discussed in detail below, the Project site is within the boundaries of the MSHCP, specifically Criteria Cells 4157, 4166, 4169, 4266, and Cell Group W (Criteria Cells 4060 and 4067) in Subunit 3: Elsinore. [3] The site is not located within any of the following MSHCP survey areas:

- Amphibian survey area;
- Mammal survey area; or
- Delhi sands flower-loving fly (*Rhaphiomidas terminatus abdominalis*) survey area.

Because the site is not located within MSHCP-designated survey areas for these resources and no evidence exists that these species inhabit the Project site, focused surveys for these resources were not required for MSHCP compliance and, therefore, were not conducted for this analysis.

Section 6.1.2 of the MSHCP defines riparian/riverine areas as, "…lands which contain Habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or areas with fresh water

[2] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. September 2 (Appendix D-1).

[3] A Criteria Cell is a roughly 160 acre rectangle overlaid onto parcels within the Multiple Species Habitat Conservation Plan (MSHCP) Plan Area and has areas described for conservation (i.e., reserve assembly). Per the Western Riverside County RCA MSHCP Mapping Tool, the Project site is partially within MSHCP Criteria Cells 4157, 4166, 4169, 4266, 4060, and 4067. Website: https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=2b9d4520bd5f4d35add35fb58808c1b7 (accessed September 9, 2025).

flow during all or a portion of the year."[4] Riparian/riverine areas as defined by the MSHCP are present within the survey area; therefore, a jurisdictional delineation of the study area was prepared as detailed below.

A majority of the Project site is located within Criteria Cell 4166, which is proposed to contribute to the assembly of Proposed Linkage 2, specifically habitat composed of Collier Marsh, Alberhill Creek, and Temescal Creek. Furthermore, the Project site is located within the following MSHCP survey areas:

- Burrowing owl (*Athene cunicularia*) survey area;
- Narrow Endemic Plant Species Survey Area (NEPSSA); and
- Criteria species survey area (plants).

Literature Search. Prior to beginning the field surveys, a literature review was completed to determine the locations and types of biological resources with the potential to exist in the Project site. The following data searches were conducted for each subsequent year in which fieldwork was performed (i.e., 2020 through 2024).[5] Included in this effort was a review of the California Natural Diversity Database (CNDDB); the CNPS Rare Plant Program Inventory of Rare and Endangered Plants of California; the Consortium of California Herbaria (CCH) data portal; the Natural Resource Conservation Service (NRCS) soil data; MSHCP species, habitat, and sensitive soil maps, current and historic aerial photography; United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC); and USFWS National Wetlands Inventory.

Survey Process. e evaluation of biological resources and habitat assessment for the Project site included literature review and reports from all recent and historical on-site surveys. The field surveys were conducted on site and augmented with information from databases and other resources. A summary of field surveys conducted for the Project are listed on Table 3.4.B, below.

Burrowing Owl Surveys. The CDFW Special Animals List[6] shows that burrowing owl is currently designated a "Candidate for listing as Endangered" under CESA and a "California Species of Concern" by the CDFW. Burrowing owl is protected by California Fish and Game Code Sections 3503, 3503.5, 3513, and 3800,[7] and is a covered species under the MSHCP. The Project site is within the MSHCP burrowing owl survey area. Suitable foraging, dispersing, and breeding habitat for the burrowing owl was identified on the Project site, and additional studies were conducted pursuant to the 2006 MSHCP Burrowing Owl Survey Instructions.

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4 Riverside County Transportation and Land Management Agency. 2004. *Western Riverside County Multiple Species Habitat Conservation Plan.* Section 6.1.2. Website: https://rctlma.org/western-riverside-county-multiple-species-habitat-conservation-plan-mshcp-1 (accessed September 2025).

5 Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* Page 12. September 2 (Appendix D-1).

6 California Department of Fish and Wildlife (CDFW). 2023. Special Animals List. Periodic publication. Sacramento, California. Page 72. October. Website: https://nrm.dfg.ca.gov/FileHandler.ashx? DocumentID= 109406&inline (accessed October 2023).

7 California Legislative Information. 2021. Fish and Game Code of California. Website: http://leginfo. legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=FGC&tocTitle=+Fish+and+Game+Code+-+FGC (accessed October 2023).

Table 3.4.B: Summary of Field Surveys

Survey	Survey Date(s)
2020	
Least Bell's Vireo Focused Surveys	4/13, 5/5, 5/18, 5/28, 6/8, 6/19, 7/15, 7/28
Southwestern Willow Flycatcher Focused Surveys	5/18, 6/9, 6/23, 7/1, 7/16
Rare Plant Surveys	4/13, 4/23, 5/5, 5/20
Special-Status Animal Habitat Assessments	4/13
Evaluation of MSHCP Vernal Pools and Fairy Shrimp Habitat	4/13, 4/23
Evaluation of MSHCP Riparian/Riverine Areas	4/13, 4/23
2021	
Evaluation of MSHCP Vernal Pools and Fairy Shrimp Habitat	2/9
Delineation of Federal and State Jurisdictional Waters	2/9
2022	
Vegetation Mapping	3/9, 4/4
Burrowing Owl Focused Surveys	3/9, 4/4, 5/2, 6/3
Rare Plant Surveys	3/14, 4/4, 4/6,5/3
Delineation of Federal and State Jurisdictional Waters	4/20, 7/29
2023	
Dry Season Fairy Shrimp Surveys (Soil Collection)	10/19, 11/2
2024	
Wet-Season Fairy Shrimp Surveys	1/26 to 5/22
Crotch's Bumble Bee Focused Surveys	5/22, 7/4
2025	
Crotch's Bumble Bee Focused Surveys	4/1, 6/3, 7/7

Source: Glenn Lukos Associates, Inc., *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 2-1 (September 2, 2025) (Appendix D-1).
GLA = Glenn Lukos Associates, Inc.
MSHCP = Multiple Species Habitat Conservation Plan

A habitat assessment for burrowing owl was conducted on April 13, 2020. Focused burrowing owl surveys were subsequently conducted on March 9, April 4, May 2, and June 3, 2022. These surveys covered the entire Project site, as well as a 500-foot buffer zone, which was visually inspected using binoculars.[8] The site was surveyed on foot, mapping the locations of California ground squirrel (*Otospermophilus beecheyi*) burrows and/or man-made "burrow surrogates" that were suitable for burrowing owl use. Focused surveys were completed via early-morning pedestrian transects over 100 percent of those areas of the site identified in the burrow search as having burrows or structures capable of supporting burrowing owls.

Riparian Birds. Least Bell's vireo (*Vireo bellii pusillus*; LBV) and southwestern willow flycatcher (*Empidonax traillii extimus*; SWFL) are both riparian birds listed as endangered under CESA and FESA. GLA biologists conducted focused surveys for LBV in 2020 in accordance with the 2001 USFWS survey guidelines. Similarly, GLA biologists conducted focused surveys for SWFL in 2020 in accordance with the 2010 USFWS survey guidelines. Although suitable habitat for other riparian bird species, such as

[8] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Pages 17–18. September 2. (Appendix D-1).

yellow warbler (*Setophaga petechia*) and yellow breasted chat (*Icteria virens*), is present on site, both species are covered under the MSHCP and do not require additional focused surveys. As a result, no focused surveys were conducted for these species. All suitable habitat within the Project site was surveyed, which consisted of on-site and adjacent off-site riparian vegetation associated with Alberhill Creek.[9]

Vernal Pool and Fairy Shrimp. The Project site contains four seasonal pond features that were evaluated for the federally threatened vernal pool fairy shrimp (*Branchinecta lynchi*) and the federally endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*). While the federally endangered Riverside fairy shrimp (*Streptocephalus woottoni*) is known to occur in the region, this species is generally not expected to be present due to the depth of the ponds and the maximum ponding duration of all ponds. Despite this, 2023 and 2024 protocol surveys conducted address the Riverside fairy shrimp.

Habitat assessments for vernal pools and fairy shrimp were conducted on April 13 and 23, 2020, and February 9, 2021. Based on these initial site evaluations, four ponded features were identified as having potential for listed fairy shrimp species. Of these, three of the features were subsequently identified as MSHCP vernal pools, while the fourth feature consisted of a nonvernal pool stock pond.[10] GLA biologists conducted focused dry-season fairy shrimp surveys on October 19 and November 2, 2023, followed by focused wet-season fairy shrimp surveys from January 26 through May 22, 2024. Protocol surveys were conducted in accordance with the USFWS Survey Guidelines for Listed Large Branchiopods.

Crotch's Bumble Bee. As of June 2019, Crotch's bumble bee (*Bombus crotchii*; CBB) was designated as a Candidate species for listing as endangered under CESA. Due to CBB not being an MSHCP covered species, impacts to CBB habitat resulting in "take" would require an Incidental Take Permit (ITP) from CDFW. GLA biologists reviewed vegetation maps and plant inventory lists to determine the extent of potential floral foraging resources for CBB, as well as evaluated burrow presence to determine the extent of potential nesting and/or overwintering resources. The presence of suitable foraging and nesting/overwintering resources dictated the need for focused CBB surveys.[11] Protocol surveys were conducted in 2023 and 2024 in accordance with CDFW's 2023 Survey Considerations for CESA Candidate Bumble Bee Species. Detections of CBB were documented via GPS and suspected CBB individuals were photographed for verification. Biologists spent an estimated 3 hours assessing the highest-quality patches of blooming plants within approximately 50 acres of vegetation supporting suitable plants per survey. In this process, minimal time was spent in lower-quality habitat.[12]

Rare Plants. The Project site is within the MSHCP NEPSSA for nine special-status plant species: Munz's onion (*Allium munzii*), San Diego ambrosia (*Ambrosia pumila*), slender-horned spineflower (*Dodecahema leptoceras*), many-stemmed dudleya (*Dudleya multicaulis*), spreading navarretia (*Navarretia fossalis*), California orcutt grass (*Orcuttia californica*), San Miguel savory (*Clinopodium*

[9] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Appendix C. September 2. (Appendix D-1).

[10] Ibid. Page 17.

[11] Ibid. Page 18.

[12] Ibid. Page 23.

chandleri), Hammitt's clay-cress (*Sibaropsis hammittii*) and Wright's trichocoronis (*Trichocoronis wrightii* var. *wrightii*). The site is also in the Criteria Area Species Survey Area (CASSA) for seven special-status plants: thread-leaved brodiaea (*Brodiaea filifolia*), Davidson's saltscale (*Atriplex serenana* var. *davidsonii*), Parish's brittlescale (*Atriplex parishii*), smooth tarplant (*Centromadia pungens* spp. *laevis*), round-leaved filaree (*California macrophylla*), Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*), and little mousetail (*Myosurus minimus* ssp. *apus*).

Plants for the approximately 140.04 acre Project site were inventoried by GLA biologists during general and focused plant surveys conducted in 2020 and 2022. The 2020 and 2022 surveys were conducted in accordance with the following guidelines: CDFW's *2018 Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*, CNPS's *Inventory of Rare and Endangered Plants of California* (Sixth Edition, 2001), USFWS' *2000 Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed, Proposed and Candidate Plants*, and James Nelson's *1984 Rare Plant Survey Guidelines*. Surveys were conducted at appropriate times, based on precipitation patterns and species-specific flowering periods. Meandering transects were used to systematically survey target areas of suitable habitat. All plant species observed during the field surveys were identified and documented.[13]

Jurisdictional Waters. GLA biologists determined the limits of jurisdictional waters within the Project site on February 9, 2021, and April 20 and July 29, 2022. Aerial imagery, topographic maps, soil maps, and the USFWS National Wetlands Inventory were reviewed for the site prior to the field surveys in order to determine potential locations of United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW jurisdiction. The 2021 and 2022 surveys were conducted in accordance with the following guidelines and methods: USACE's *1987 Corps Wetland Delineation Manual*, USACE's *2008 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region*, *2021 State Wetland Definition and Procedures for Discharges of Dredged or Fill*, and the *2025 National Ordinary High Water Mark Field Delineation Manual for Rivers and Streams*, as needed. Surveys were conducted using a sub-meter Trimble GPS to record the limits of jurisdiction and data was collected on Wetland Determination Data Forms.[14]

3.4.3 Existing Environmental Setting

The Project site is an undeveloped, approximately 140.04 acre site,[15] located southwest of Interstate (I-)15, Lake Elsinore Outlet Center, and Temescal Creek/Collier Marsh within the city of Lake Elsinore. The Project site is located within MSHCP Criteria Cells 4157, 4166, 4169, and 4266, and Cell Group W (Criteria Cells 4060 and 4067) in Subunit 3: Elsinore. Approximately 89.44 acres of the Project site's 140.04 acres occur within a Criteria Cell.

13 Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Page 15. September 2. (Appendix D-1).

14 Ibid. Pages 24 and 25.

15 The Project site acreage varies slightly among the various biological technical studies and does not include paved and dirt roads for purposes of the biological surveys.

Prior to the completion of the Joint Project Review (JPR),[16] approximately 33.66 acres, including 32 acres within the northeastern portion of Cell 4166 that includes and is adjacent to Alberhill Creek/Collier Marsh, were placed into conservation with the RCA. The RCA issued JPR Findings on July 31, 2025.

3.4.3.1 Vegetation

The Project site consists of nine vegetation communities and land covers, including Akali Grassland, Akali Playa, Disturbed/Developed, Open Water, Riversidean Sage Scrub, Semi-Natural Herbaceous Grassland, Disturbed Semi-Natural Herbaceous Grassland, Southern Willow Riparian Scrub and Vernal Pool. Vegetation mapping for the Project was developed using the CDFW's 2025 *List of Vegetation Alliances and Associations*, which is based on *A Manual of California Vegetation, Second Edition*. Vegetation types on the Project site are shown on Figure 3.4-1 and listed in Table 3.4.C. Only a portion of the Project site is within Criteria Cells; thus, Table 3.4.C identifies the on-site acreages of vegetation types that are inside and outside of Criteria Cells.

Table 3.4.C: Vegetation Within Project Site

Vegetation Community/Land Use	Project Site (acres)	
	Inside Criteria Cells	Outside Criteria Cells
Akali Grassland	3.59	0
Akali Playa	0.73	0
Disturbed/Developed	20.08	10.62
Open Water	0.09	0
Riversidean Sage Scrub	2.49	0.52
Semi-Natural Herbaceous Grassland	38.88	30.84
Disturbed Semi-Natural Herbaceous Grassland	20.72	4.59
Southern Willow Riparian Scrub	1.14	0
Vernal Pool	1.72	0
Totals	**89.44**	**46.57**
Cumulative Total	**136.01**	

Source: Glenn Lukos Associates, Inc., Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California, Table 4-1 (September 2, 2025) (Appendix D-1).
Note: Disturbed/Developed Land Cover does not include 4.03 acres of existing roadway within the off-site improvements that was not surveyed.
GLA = Glenn Lukos Associates, Inc.

Alkali Grassland. The Project site contains 3.59 acres of Alkali Grassland. This vegetation type is only located within RCA Conserved Lands (proposed Restoration Area). Alkali Grassland is dominated by alkali weed (*Cressa truxillensis*), silverscale saltbush (*Atriplex argentea*), alkali mallow (*Malvella leprosa*), Harding grass (*Phalaris aquatica*), neckweed (*Veronica peregrina*), and foxtail barley (*Hordeum murinum*). Alkali Grassland supports the special-status plant species Coulter's goldfields,

[16] Joint Project Review (JPR) is a process by the Western Riverside County Regional Conservation Authority (RCA) to evaluate development projects located within the Multiple Species Habitat Conservation Plan (MSHCP) "Criteria Cells."

San Jacinto valley crownscale (*Atriplex coronata* var. *notatior*), and vernal barley (*Hordeum intercedens*).[17]

Alkali Playa. The Project site contains approximately 0.73 acre of Alkali Playa. This vegetation type is only located within the Restoration Area. Alkali playa is dominated by plant species adapted to salty substrates, including alkali weed, alkali heath (*Frankenia salina*), saltgrass (*Distichlis spicata*), silverscale saltbush, and bush seepweed (*Suaeda nigra*). Alkali Playa supports the special-status plant species Coulter's goldfields, San Jacinto Valley crownscale, and vernal barley.[18]

Disturbed/Developed. The Project site contains 30.70 acres of Disturbed/Developed. This land cover is dominated by coastal heron's bill (*Erodium cicutarium*), Russian thistle (*Salsola tragus*), London rocket (*Sisymbrium irio*), cheeseweed (*Malva parviflora*), and summer mustard (*Hirschfeldia incana*). Disturbed/Developed encompasses paved roads, unpaved access roads, and former residential lots and is located within Baker Street, Pierce Street, Terra Cotta Road, Nichols Road, and Collier Avenue.[19]

Open Water. The Project site contains approximately 0.09 acre of Open Water. This land use type encompasses a perennial segment of Alberhill Creek that traverses the northern extent of the RCA Conserved Lands (Restoration Area).[20]

Riversidean Sage Scrub. The Project site contains 3.01 acres of Riversidean Sage Scrub, located in the southwestern portion of the Project site. This vegetation community is dominated by brittlebush (*Encelia farinosa*), California sagebrush (*Artemisia californica*), black sage (*Salvia mellifera*), and California buckwheat (*Eriogonum fasciculatum*). Its understory consists of common sandaster (*Corethrogyne filaginifolia*), clustered tarweed (*Deinandra fasciculata*), blue dicks (*Dichelostemma capitatum*), wild cucumber (*Marah macrocarpa*), California plantain (*Plantago erecta*), splendid mariposa (*Calochortus splendens*), common Mediterranean grass (*Schismus barbatus*), and various brome species (*Bromus* spp.).[21]

Semi-Natural Herbaceous Grassland. The Project site contains approximately 69.72 acres of Semi-Natural Herbaceous Grassland; this is also the dominant vegetation community within the site. This vegetation type exhibits significant historic disturbance, which is currently made up of exotic species. Semi-Natural Herbaceous Grassland is dominated by common fiddleneck (*Amsinckia intermedia*), London rocket, cheeseweed, and coastal heron's bill. In early spring, it contains sporadic occurrences of native wildflowers such as lupine (*Lupinus bicolor*), chick lupine (*Lupinus microcarpus*), goldfields (*Lasthenia californica*), and red maids (*Calandrinia menziesii*). In late spring and early summer, it is dominated with nonnative grass species including red brome (*Bromus rubens*), ripgut brome (*Bromus diandrus*), foxtail barley, and slim oat (*Avena barbata*).[22]

17 Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Pages 37–38. September 2 (Appendix D-1).
18 Ibid. Page 38.
19 Ibid.
20 Ibid. Pages 37–38.
21 Ibid. Pages 38–39.
22 Ibid. Page 39.

Disturbed Semi-Natural Herbaceous Grassland. The Project site contains 25.31 acres of Disturbed Semi-Natural Herbaceous Grassland, which is located in the central portion of the site along Baker Street. While this vegetation type is similar to Semi-Natural Herbaceous Grassland, it exhibits more frequent disturbances from routine mowing and disking. Disturbed Semi-Natural Herbaceous Grassland is dominated by summer mustard, stinknet (*Oncosiphon piluliferum*), prickly lettuce (*Lactuca serriola*), London rocket, cheeseweed, coastal heron's bill, red brome, ripgut brome, foxtail barley, and slim oat. Although similar to the vegetation community described above, Disturbed Semi-Natural Herbaceous Grassland lacks native wildflowers.[23]

Southern Willow Riparian Scrub. The Project site contains approximately 1.14 acres of Southern Willow Riparian Scrub. This vegetation type is dominated by shrubby willows (*Salix* spp.) in association with mule fat (*Baccharis salicifolia*), and an assortment of young and mature willow trees, including black willow (*Salix gooddingii*), red willow (*Salix laevigata*), and arroyo willow (*Salix lasiolepis*). It also includes sporadic occurrences of mule fat, tamarisk (*Tamarix ramosissima*), western ragweed (*Ambrosia psilostachya*), big saltbush (*Atriplex lentiformis*), saltgrass, and yerba mansa (*Anemopsis californica*).[24]

Vernal Pool. The Project site contains approximately 1.72 acres of the Vernal Pool vegetation community, consisting of three separate vernal pools. The northernmost seasonal pool (Vernal Pool 3) is partially sustained by runoff from an adjacent ephemeral drainage, whereas the other two pools (Vernal Pools 1 and 2) are depressional features that inundate from direct rainfall and runoff from the immediate local watershed. This vegetation community is dominant by alkali plagiobothrys (*Plagiobothrys leptocladus*), alkali weed, alkali mallow, common toad rush (*Juncus bufonius*), and Harding grass. It also supports special-status plants consisting of Coulter's goldfields, small-flowered microseris (*Microseris douglasii* ssp. *platycarpha*), San Jacinto Valley crownscale, and vernal barley.[25]

3.4.3.2 Plant Species

The MSHCP requires habitat assessments, surveys, and impact evaluations for certain special-status plant species within the designated survey areas for each species. These survey areas are referred to as NEPSSA and CASSA plants in the MSHCP, and each survey area is associated with a suite of species that require assessment of impact potential. The Project site is within MSHCP survey areas for NEPSSA and CASSA plant species. As noted in Table 3.4.B, focused rare plants surveys were conducted on April 13 and 23; May 5 and 20, 2020; and March 14, April 4 and 6, and May 3, 2022. Rare plant types on the Project site are shown on Figure 3.4-2. GLA biologists detected the following special-status plants within the Project site (Table 3.4.D): San Diego ambrosia, Coulter's goldfields, San Jacinto Valley crownscale, vernal barley, and small-flowered microseris. Additionally, there is a 2017 record of little mousetail occurring within the Project site in a pool adjacent to Baker Street. Despite this plant species and pool not being detected during focused surveys, it is possible that it occurs on site.

[23] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Page 39. September 2 (Appendix D-1).
[24] Ibid. Pages 39–40.
[25] Ibid. Page 40.

Table 3.4.D: Special-Status Plants Detected

Species	Status
San Diego ambrosia *Ambrosia pumila*	US: FE CA: 1B.1 MSHCP: S
San Jacinto Valley crownscale *Atriplex coronata* var. *notatior*	US: FE CA: 1B.1 MSHCP: S
Vernal barley *Hordeum intercedens*	US: – CA: 3.2 MSHCP: C
Coulter's goldfields *Lasthenia glabrata* ssp. *coulteri*	US: – CA: 1B.1 MSHCP: S
Small-flowered microseris *Microseris douglasii* ssp. *platycarpha*	US: – CA: 4.2 MSHCP: C
Little mousetail *Myosurus minimus* ssp. *apus*	US: – CA: 3.1 MSHCP: S

Source: California Department of Fish and Wildlife (CDFW). 2025. California Natural Diversity Database (CNDDB), RareFind 5 Version 5.2.14. Records of occurrence for the USGS *Lake Elsinore, Lake Mathews, Steele Peak, Perris, Romoland, Murrieta, Wildomar, Sitton Peak,* and *Alberhill* quadrangle maps. Sacramento, CA: CDFW, Natural Heritage Division Website: https://apps.wildlife.ca.gov/rarefind/view/RareFind.aspx (accessed August 2025).
S = Species is covered and adequately conserved under the Multiple Species Habitat Conservation Plan (MSHCP), but surveys are required within indicated habitats and/or survey areas
C = Species is adequately conserved under the MSHCP
FE = Federally listed as Endangered
1B = California Rare Plant Rank 1B – rare, threatened, or endangered in California and elsewhere
3 = California Rare Plant Rank 3 – a review list of plants about which more information is needed
4 = California Rare Plant Rank 4 – a watch list of plants of limited distribution

San Diego Ambrosia. Rare plant surveys in 2020 and 2022 detected San Diego ambrosia occurring within multiple locations throughout the Project site, limited to mostly the development footprint. A small population of this species was detected on the edge of Vernal Pool 3, within RCA Conserved Lands (the Restoration Area). An estimated 9,000 plants within 0.44 acre were documented by GLA biologists.[26] San Diego ambrosia is covered and adequately conserved under the MSHCP, but surveys are required within indicated habitats and/or survey areas, specifically within the NEPSSA, where suitable habitat is present.

San Jacinto Valley Crownscale. Rare plant surveys in 2020 and 2022 detected San Jacinto Valley crownscale occurring within Vernal Pool 1, which includes RCA Conserved Lands (Restoration Area) and the development footprint. A population estimated at 1,500 individuals of this species was detected within RCA Conserved Lands (Restoration Area) and a few individuals within the development footprint. San Jacinto Valley crownscale is covered and adequately conserved under the

[26] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Page 46. September 2 (Appendix D-1).

MSHCP, but surveys are required within indicated habitats and/or survey areas. The Project site is not within a survey area for this species.[27]

Vernal Barley. Rare plant surveys in 2020 and 2022 detected vernal barley occurring within RCA Conserved Lands (Restoration Area) and the development footprint (specifically, within Vernal Pool 3 and within RCA Conserved Lands along Alberhill Creek). A small population of this species was detected within Vernal Pool 3, which was estimated at less than 10 individuals.[28] A larger population (estimated at a few thousand) is located within RCA Conserved Lands (Restoration Area) along with Coulter's goldfields. Vernal barley is covered and adequately conserved under the MSHCP.

Coulter's Goldfields. Rare plant surveys in 2020 and 2022 detected Coulter's goldfields occurring within multiple locations throughout the Project site, including the development footprint. Specifically, this species was detected in Vernal Pools 1, 2, and 3 and RCA Conserved Lands (Restoration Area). An estimated 9,000 plants within 2.71 acres were documented by GLA biologists. Approximately 0.50 acre of the 2.71 acres are within the development footprint.[29] Coulter's goldfields is covered and adequately conserved under the MSHCP, but surveys are required within indicated habitats and/or survey areas.

Small-flowered Microseris. Rare plant surveys in 2020 and 2022 detected five individuals of small-flowered microseris occurring within Vernal Pool 2, which is within RCA Conserved Lands (Restoration Area).[30] Small-flowered microseris is covered and adequately conserved under the MSHCP.

Little Mousetail. Little mousetail was not detected during the 2020 and 2022 rare plant surveys. This species was historically reported as occurring within the Project site within a vernal pool adjacent to Baker Street in 2017. The vernal pool adjacent to Baker Street was not detected during surveys of the site. Therefore**,** it is possible that little mousetail occurs within Vernal Pool 3 where Coulter's goldfields was detected during the 2020 and 2022 rare plant surveys since Vernal Pool 3 is near the historical 2017 occurrence.[31] Little mousetail is covered and adequately conserved under the MSHCP, but surveys are required within indicated habitats and/or survey areas.

3.4.3.3 Animal Species

Multiple focused surveys were conducted for special-status animal species: fairy shrimp, CBB, LBV, SWFL, and burrowing owl. The Project site currently provides suitable habitat for the special-status animal species listed in Table 3.4.E.

As described in Section 2.1.4 of the MSHCP, 146 Covered Species are addressed in the MSHCP. A total of 118 of those species are considered adequately conserved under the MSHCP. The remaining 28 Covered Species need to meet certain conservation requirements to be considered adequately

[27] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Page 47. September 2 (Appendix D-1).
[28] Ibid. Page 48.
[29] Ibid. Page 46 and 47.
[30] Ibid. Page 49.
[31] Ibid.

Table 3.4.E: Special-Status Species Detected

Species	Status
Crotch's bumble bee *Bombus crotchii*	US: – CA: SCE MSHCP: –
Western spadefoot *Spea hammondii*	US: FPT CA: SSC MSHCP: C
Cooper's hawk *Accipiter cooperii* (nesting)	US: – CA: WL MSHCP: C
California horned lark *Eremophila alpestris actia*	US: – CA: WL MSHCP: C
Yellow-breasted chat *Icteria virens* (nesting)	US: – CA: SSC (breeding) MSHCP: C
Yellow warbler *Setophaga petechia* (nesting)	US: CA: SSC (breeding) MSHCP: C
Least Bell's vireo *Vireo bellii pusillus* (nesting)	US: FE CA: SE (breeding) MSHCP: C

Source: Glenn Lukos Associates, Inc., *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 4-3 (September 2, 2025) (Appendix D-1).
C = Species is adequately conserved under the MSHCP
FPT = Federally Proposed Threatened
FE = Federally Endangered
S = Species is covered and adequately conserved under the MSHCP, but surveys are required within indicated habitats and/or survey areas
SE = State Endangered
SCE = State Candidate as Endangered
SSC = CDFW Species of Special Concern
WL = CDFW Watch List Species

conserved. The species-specific conservation objectives for the remaining 28 species can be found in Section 9.0 of the MSHCP. For those species considered adequately conserved, take authorization is allowed through the California Natural Community Conservation Planning (NCCP) Permit and for animals through the Section 10(a) Permit issued in conjunction with the Implementing Agreement (IA) of the MSHCP. For example, according to Table 9-3 of the MSHCP, for California spotted owl (*Strix occidentalis occidentalis*) to be considered adequately conserved under the MSHCP, a Memorandum of Understanding must be executed with the United States Forest Service that addresses management for this species on USFS land. As noted above, the conservation objectives for the 28 remaining Covered Species varies by species.

Habitat for riparian bird species, including LBV, SWFL, and western yellow-billed cuckoo (*Coccyzus americanus occidentalis*), is present within the Project site but only within RCA Conserved Lands (the Restoration Area) and not in the areas planned for development. Within the suitable riparian habitat

on site, riparian bird species listed in Table 3.4.E were detected. The MSHCP indicates that the Project site is not within a MSHCP designated amphibian or mammal survey area but is within a burrowing owl survey area.

Burrowing Owl. The Project site, including the off-site improvements footprint, is located within the MSHCP Burrowing Owl Survey Area and suitable habitat is present. Protocol surveys for this species conducted in 2022 were negative for the presence of this species. Several small mammal burrows suitable for burrowing owl were observed during the 2022 survey effort. However, the only indication of burrowing owl sign was a single owl pellet observed at a burrow within the Restoration Area along the fence line. The age of the pellet could not be determined; however, the absence of additional signs and the lack of owl sightings during the surveys suggest it may have been a transient owl not occupying the site at the time of the surveys.[32] Burrowing owl is covered and adequately conserved under the MSHCP, but surveys are required within indicated habitats and/or survey areas.

Crotch's Bumble Bee. During focused CBB surveys conducted in May 2024, three female CBBs (one queen and two daughters) were observed foraging on white sage (*Salvia apiana*) and California buckwheat within Riversidean sage scrub vegetation and white sage within the adjacent grasslands. Other CBB individuals were also observed flying to and from the grassland habitat within the flatter part of the Project site. No CBB individuals were detected in 2025.

Western Spadefoot. Focused surveys were not required and not conducted for western spadefoot. However, during the 2024 wet season fairy shrimp surveys, western spadefoot tadpoles were detected within Vernal Pools 1, 2, and 3. It was not possible during biological surveys to confirm whether western spadefoot from the vernal pools aestivated[33] in burrows within the development footprint; however, it remains a possibility. Although western spadefoot tadpoles were observed in Vernal Pools 1, 2, and 3, the presence of crayfish (*Procambarus clarkii*) in Vernal Pools 1 and 3 may pose a potential predation risk.[34] Western spadefoot is covered and adequately conserved under the MSHCP.

Cooper's Hawk. Cooper's hawk was observed foraging within the Project site; however, this species would not nest within the development footprint. This species typically nests within deciduous, mixed, and evergreen forests and deciduous stands of riparian habitat, which the development footprint lacks.[35] Cooper's hawk is covered and adequately conserved under the MSHCP.

California Horned Lark. California horned lark was observed foraging within the Project site in grasslands, and there is potential for this species to nest on site.[36] California horned lark is covered and adequately conserved under the MSHCP.

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32 Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. Pages 63–64. September 2 (Appendix D-1).

33 Aestivation is a state of animal dormancy, similar to hibernation, although taking place in the summer rather than the winter.

34 *Glenn Lukos Associates, Inc. Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* Page 58. September 2, 2025. (Appendix D-1).

35 Ibid. Page 61.

36 Ibid. Page 62.

Yellow-Breasted Chat. During the focused LBV and SWFL surveys conducted in 2020, this species was detected in Alberhill Creek near Nichols Road and within the RCA Conserved Lands (Restoration Area).[37] However, the development footprint does not offer suitable habitat for yellow-breasted chat. Yellow-breasted chat is covered and adequately conserved under the MSHCP.

Yellow Warbler. During the focused LBV and SWFL surveys conducted in 2020, this species was detected in Alberhill Creek near Nichols Road and within the RCA Conserved Lands (Restoration Area).[38] However, the development footprint does not offer suitable habitat for yellow warbler. Yellow warbler is covered and adequately conserved under the MSHCP.

Least Bell's Vireo. Focused LBV and SWFL surveys were conducted in 2020, and a male LBV was detected within Alberhill Creek during each visit in proximity to the Nichols Road crossing of the creek. LBV is covered and adequately conserved under the MSHCP.

3.4.3.4 On-Site Aquatic Resources

The Project site is undeveloped, featuring a mix of steep and flat topography. Six ephemeral drainages (Drainages A, B, C, D, E, and F), three vernal pools (Vernal Pools 1, 2, and 3), one stock pond, and Alberhill Creek are present within the Project site (Figure 3.4-6).[39] Acreage totals are shown in Table 3.4.F. CDFW jurisdiction consists of features exhibiting flow sign indicators that include break in bank slope, flow patterns, changes in soil characteristics, water marks, and those supporting associated riparian habitat.

Alberhill Creek. Alberhill Creek consists of Southern Willow Scrub Riparian Scrub, Alkali Playa, Open Water, and Semi-Natural Herbaceous Grassland. It is tributary to Temescal Creek, which contributes significant flows to the Santa Ana River, which is tributary to a Traditional Navigable Water (TNW), the Pacific Ocean. Alberhill Creek is the only USACE jurisdictional area, totaling 2.33 acres of wetland waters of the United States (WOTUS), within the Project site. This feature consists of 2.33 acres of Regional Water Quality Control Board (RWQCB) wetland Waters of the State (WOTS), and 2.36 acres of CDFW Riparian, including 2.36 acres of MSHCP riparian.[40] The majority of the portion of Alberhill Creek that is within the Project site is within the Restoration Area.

Drainage A. Drainage A is an ephemeral drainage that consists of Semi-Natural Herbaceous Grassland, Disturbed Semi-Natural Herbaceous Grassland, and Alkali Grassland. It generally flows west to northeast, crossing under Baker Street into Vernal Pool 3 and merging with Alberhill Creek. This feature consists of 0.15 acre of RWQCB nonwetland WOTS, 0.18 acre of CDFW streambed, and 0.18 acre of MSHCP riverine.[41] Portions of Drainage A occur within the development footprint and Restoration Area.

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37 *Glenn Lukos Associates, Inc. Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* Page 60. September 2, 2025. (Appendix D-1).

38 Ibid. Page 59.

39 Ibid. Page 66.

40 Ibid. Page 68.

41 Ibid. Pages 68 and 69.

Table 3.4.F: Jurisdictional Waters

Feature	USACE Wetland WOTUS (acres)	RWQCB Nonwetland WOTS (acres)	RWQCB Wetland WOTS (acres)	CDFW Streambed (acres)	CDW Riparian (acres)	MSHCP Riparian (acres)	MSHCP Riverine (acres)
Alberhill Creek	2.33	–	2.33	–	2.36	2.36	–
Drainage A	–	0.15	–	0.18	–	–	0.18
Drainage B	–	0.13	–	0.13	–	–	0.13
Drainage C	–	0.03	–	0.03	–	–	0.03
Drainage D	–	0.07	–	0.09	–	–	0.09
Drainage E	–	0.02	–	0.04	–	–	0.04
Drainage F	–	0.20	–	0.20	–	–	0.20
Vernal Pool 1	–	–	0.45	–	–	–	–
Vernal Pool 2	–	–	0.41	–	–	–	–
Vernal Pool 3	–	–	0.86	–	0.86	–	–
Stock Pond	–	–	–	–	–	–	–
Total	**2.33**	**0.60**	**4.05**	**0.67**	**3.22**	**2.36**	**0.67**

Source: Glenn Lukos Associates, Inc. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Tables 4-4, 4-5, 4-6, and 4-7 (September 2, 2025) (Appendix D-1).
CDFW = California Department of Fish and Wildlife
MSHCP = Multiple Species Habitat Conservation Plan
RWQCB = Regional Water Quality Control Board
USACE = United States Army Corps of Engineers
WOTS = Waters of the State
WOTUS= Waters of the United States

Drainage B. Drainage B is an ephemeral drainage that consists of Semi-Natural Herbaceous Grassland and Disturbed Semi-Natural Herbaceous Grassland. It generally flows west to north, conveying stormwater and irrigation runoff from an adjacent rural residence. This feature consists of 0.13 acre of RWQCB nonwetland WOTS, 0.13 acre of CDFW streambed, and 0.13 acre of MSHCP riverine.[42]

Drainage C. Drainage C is an erosional ephemeral drainage that consists of Semi-Natural Herbaceous Grassland. It generally flows in a south to north direction, originating offsite from adjacent hillsides. This feature consists of 0.03 acre of RWQCB non-wetland WOTS, 0.03 acre of CDFW streambed, and 0.03 acre of MSHCP riverine. [43]

Drainage D. Drainage D is an erosional ephemeral drainage that consists of Semi-Natural Herbaceous Grassland. It generally flows west to northeast toward an existing rural residence. This feature consists of 0.07 acre of RWQCB nonwetland WOTS, 0.09 acre of CDFW streambed, and 0.09 acre of MSHCP riverine.[44]

Drainage E. Drainage E is an ephemeral drainage that consists of Semi-Natural Herbaceous Grassland. It generally flows northwest to southeast, originating as runoff from Nichols Road, and conveys a

[42] *Glenn Lukos Associates, Inc. Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* Page 69. September 2, 2025. (Appendix D-1).
[43] Ibid. Page 69.
[44] Ibid. Page 70.

surficial connection to Alberhill Creek. This feature consists of 0.02 acre of RWQCB nonwetland WOTS, 0.04 acre of CDFW streambed, and 0.04 acre of MSHCP riverine.[45]

Drainage F. Drainage F is a roadside ephemeral drainage that consists of Disturbed/Developed. It runs parallel to Nichols Road and generally flows west to east, originating as runoff from the adjacent hillsides of Nichols Road. This feature consists of 0.20 acre of RWQCB nonwetland WOTS, 0.20 acre of CDFW streambed, and 0.20 acre of MSHCP riverine.[46]

Stock Pond. The 0.17 acre stock pond is a manmade agricultural feature created for the purpose of agricultural crop irrigation and/or stock watering. This pond is located south of Baker Street within the development footprint. This feature is considered nonjurisdictional due to stock ponds not being considered WOTS.[47]

Vernal Pools. Section 6.1.2 of the MSHCP defines vernal pools as "seasonal wetlands that occur in depression areas that have wetland indicators of all three parameters (soils, vegetation, and hydrology) during the wetter portion of the growing season, but normally lack wetland indicators of hydrology and/or vegetation during the drier portion of the growing season." Seasonal pooling suitable as fairy shrimp habitat was within the Project site; therefore, focused surveys for fairy shrimp were conducted, as described above. Areas described below and detailed in Table 3.4.G met the MSHCP definition for vernal pools.

Table 3.4.G: MSHCP Vernal Pools

Feature	Ponding Surface Area (acres)	Maximum Observed Depth (inches)	Estimated Average Depth (inches)	Pool Volume (acre-feet)
Vernal Pool 1	0.45	18	8	0.30
Vernal Pool 2	0.41	22	10	0.34
Vernal Pool 3	0.86	22	10	0.72
Total	**1.72**			

Source: Glenn Lukos Associates, Inc., *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 4-8 (September 2, 2025) (Appendix D-1).

Vernal Pool 1. Vernal Pool 1 is located in proximity to Alberhill Creek just east of Baker Street and accepts surface sheet flows from the southerly hills directly southwest of Baker Street. Species observed within Vernal Pool 1 consist of salt grass, Coulter's goldfields, vernal barley, and San Jacinto Valley crownscale. It had presence of surface soil cracks, wetland vegetation, and moderately to very strongly alkaline soils. This feature consists of 0.45 acre of RWQCB wetland WOTS.[48] The entirety of Vernal Pool 1 is within the Restoration Area.

45 *Glenn Lukos Associates, Inc. Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* Page 70. September 2, 2025. (Appendix D-1).
46 Ibid. Page 70 and 71.
47 Ibid. Page 71. See U.S.C., tit. 33, Section 1344(f)(1)(C).
48 Ibid.

Vernal Pool 2. Vernal Pool 2 is located in proximity to Alberhill Creek just east of Baker Street and supported by direct rainfall supplemented by surface sheet flows from the southwest. Vernal Pool 2 supports a small population of Coulter's goldfields. It had presence of surface soil cracks, and seasonally ponded soils. This feature consists of 0.41 acre of RWQCB wetland WOTS.[49] A small portion (0.01 acre) of Vernal Pool 2 is within the development footprint.

Vernal Pool 3. Vernal Pool 3 is located in proximity to Alberhill Creek just east of Baker Street and is supported by direct rainfall and Drainage A flows. Vernal Pool 3 supports Coulter's goldfields and vernal barley. This feature consists of 0.86 acre of RWQCB wetland WOTS.[50] A small portion (0.16 acre) of Vernal Pool 3 is within the development footprint.

3.4.4 Regulatory Setting

Policies and regulations that potentially apply to the biological resources associated with the Project are listed below. Any impacts that conflict with these policies and regulations could be considered significant under CEQA.

3.4.4.1 Federal Regulations

United States Endangered Species Act (16 U.S.C. Section 1531, et seq.). The USFWS, pursuant to FESA, protects endangered and threatened species. FESA defines an endangered species as a species in danger of extinction throughout all or a significant part of its range and a threatened species as one that is likely to become endangered in the foreseeable future. USFWS also identifies species proposed for listing as endangered or threatened. Other than for federal actions, there is no formal protection for Candidate species under FESA. However, consultation with USFWS regarding species proposed for listing can prevent project delays that could occur if a species is listed prior to project completion.

Clean Water Act (33 U.S.C. Section 1251, et seq.). Section 401 of the Clean Water Act (CWA) requires certification for any federal permit or license authorizing impacts to WOTUS (i.e., waters that are within federal jurisdiction), such as Section 404 of the CWA and Section 10 of the Safe Rivers and Harbors Act, to ensure that the impacts do not violate State water quality standards. When a project could impact waters outside of federal jurisdiction, the RWQCB has the authority under the Porter-Cologne Water Quality Control Act to issue Waste Discharge Requirements (WDRs) to ensure that impacts do not violate state water quality standards. CWA Section 401 Water Quality Certifications, WDRs, and waivers of WDRs are also referred to as orders or permits. WOTS are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (California Water Code 13050[e]).

Migratory Bird Treaty Act (16 U.S.C. Section 703, et seq.). The federal Migratory Bird Treaty Act (MBTA) governs the intentional killing and poaching of migratory birds and their eggs, parts, and nests. Harassment and habitat modification are not included unless they result in the direct loss of birds, nests, or eggs. Section 704 of the MBTA states that the United States Secretary of the Interior is authorized and directed to determine if, and by what means, the take of migratory birds should be

[49] *Glenn Lukos Associates, Inc. Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California.* Page 71. September 2, 2025. (Appendix D-1).

[50] Ibid.

allowed and to adopt suitable regulations permitting and governing take while ensuring that take is compatible with protection of the species. Most bird species are protected under the MBTA.

3.4.4.2 State Regulations

California Endangered Species Act (California Fish and Game Code Section 2050, et seq.). CESA was developed to protect species of fish, wildlife, and plants that are in danger of, or threatened with, extinction because their habitats are threatened with destruction, adverse modification, or severe curtailment, or because of overexploitation, disease, predation, or other factors.

"Take" as defined under CESA means hunt, pursue, capture, or kill, or attempt to hunt, pursue, capture, or kill.[51] Under certain conditions, CESA has provisions for take through a 2081 Permit or a Section 2081 Memorandum of Understanding. The impacts of the authorized take must be minimized and fully mitigated. No permit may be issued if the issuance of the permit would jeopardize the continued existence of the species.

California Environmental Quality Act (14 CCR Section 15000 et seq.). Section 15380(b) of the *CEQA Guidelines* provides that a species not listed on the federal or State lists of protected species may be considered rare or endangered if the species can be shown to meet specified criteria. These criteria have been modeled after the definitions in FESA, CESA and § 2780–2781 of Article 1 of the California Fish and Game Code dealing with the California Wildlife Protection Act of 1990. This section was included in the guidelines primarily to address situations in which a public agency is reviewing a project that may have a significant effect on a species that has not yet been listed by either the USFWS or CDFW. However, as confirmed by *Nassiri v. City of Lafayette* (2024) 103 Cal.App.5th 910, determination that a nonlisted species is nevertheless rare or endangered should be based on the specific facts of the project at issue and should not rely on other ancillary lists prepared by federal and State agencies.

California Fish and Game Code. Various sections of the California Fish and Game Code provide protection to nesting birds and birds of prey, as well as species protected under the MBTA. Sections 3505, 3503.5, and 3800 of the California Fish and Game Code prohibit the destruction, possession, or take of the nest or eggs of any bird as otherwise provided for in the Fish and Game Code. Under the California Fish and Game Code, take is defined as "to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Section 3503.5 specifically extends this protection to the nests or eggs of any bird of prey (species of the Orders *Falconiformes* [falcons, hawks, eagles, ospreys] *or Strigiformes* [owls]). The unlawful take, sale, or purchase (whole or in part) of any aigrette or egret, osprey, bird of paradise, goura, or numidi is prohibited under Section 3505. Section 3513 prohibits the unlawful take or possession of any migratory nongame bird as designated in the MBTA, or any part of such migratory nongame bird, except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Streambed Alteration Agreements. Sections 1600 et seq. of the California Fish and Game Code define the responsibilities of the CDFW and require public and private applicants to obtain an agreement for projects that would "… substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake, or deposit or dispose of

[51] California Fish and Game Code Section 86.

debris, waste, or other material containing crumbled, flaked, or ground pavement where it may pass into any river, stream, or lake."[52] CDFW wardens and/or unit biologists typically have the responsibility for negotiating and issuing Streambed Alteration Agreements. The CDFW, through provisions of the Fish and Game Code (Sections 1601–1603), is empowered to enter into agreements for any substantial alteration of a river, stream, or lake where fish or wildlife resources may be adversely affected. Streams (and rivers) are defined by the presence of a channel bed and banks, and at least an intermittent flow of water.

Native Plant Protection Act (California Fish and Game Code Section 1900, et seq.). Sections 1900–1913 of the Native Plant Protection Act (NPPA) direct the CDFW to carry out the Legislature's intent to "… preserve, protect and enhance endangered or rare native plants of this state."[53] The NPPA gives the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take.[54]

3.4.4.3 Regional Regulations

Western Riverside County Multiple Species Habitat Conservation Plan. The MSHCP covers 146 species and 14 natural communities within a plan area of about 1.26 million acres, or 1,970 square miles, extending from the western Riverside County boundary to the San Jacinto Mountains. Roughly 506,000 acres are planned for conservation. The MSHCP was implemented in 2003 and is administered by the RCA.

The purpose of the MSHCP is to conserve large contiguous blocks of habitat to maintain species richness and density, ensure population viability, protect habitats from encroachment, and reduce nonnative species invasion. The Criteria Area consists of quarter-section (160-acre) criteria cells within the MSHCP planning boundary that will be used to assemble 153,000 acres of new conservation land (the Conservation Area). The MSHCP provides for the assembly of a reserve consisting of Core Areas and Linkages for the conservation of Covered Species.[55] The MSHCP provides an incentive-based program (the Habitat Evaluation and Acquisition Negotiation Strategy) for adding land to the MSHCP. A Core is the largest planning unit, and its extent is large enough to support the population of several species. A Linkage is a habitat connection between Cores that is wide enough and long enough to provide live-in habitat and movement corridors for plants, herbivores, and carnivores. Projects in proximity to the MSHCP Conservation Area may result in edge effects that would adversely affect biological resources within the MSHCP Conservation Area. MSHCP Urban/Wildlands Interface Guidelines (MSHCP Section 6.1.4) are intended to reduce such indirect effects.

The MSHCP requires focused surveys for certain plant and animal species for project sites within designated survey areas where potential suitable habitat is present. In addition to species that have designated survey areas, surveys for listed riparian birds are required when suitable riparian habitat is

52 California Fish and Game Code Section 1602.
53 California Fish and Game Section 1900.
54 California Fish and Game Section 1904.
55 Western Riverside County Regional Conservation Authority. 2022. Habitat Conservation. Website: https://www.wrc-rca.org/habitat-conservation/ (accessed January 2, 2024).

present, and surveys for listed fairy shrimp species are required when vernal pools or other suitable habitat is present.

The MSHCP sets forth conservation goals for each covered species. A development project must either demonstrate that the conservation goals for each covered species (that were identified within the Project site) have been met or prepare a DBESP report enumerating mitigation measures to achieve equivalent or superior preservation for each not conserved covered species through deed restriction, conservation easement, or other appropriate method. Mitigation measures may include restoration and/or enhancement of on-site and/or off-site habitat.

The City was a party to the IA for the MSHCP when it was implemented in 2004. There were 13 total cities that were parties to the original IA, and 4 additional cities have become member agencies of the RCA since the IA was adopted in 2004. Since being a part of the original IA, the City is part of the Joint Powers Agreement (JPA) that governs the RCA's operations and administers the MSHCP.

As noted above, the Project site is in the MSHCP plan area, including Criteria Cells 4157, 4166, 4169, and 4266; Cell Group W (Criteria Cells 4060 and 4067); the burrowing owl survey area; NEPSSA; and CASSA for plants.

"Covered species adequately conserved" under the MSHCP means covered species where the species objectives set forth in the MSHCP are met and which are provided take authorization through the NCCP Permit and, for animals, through the FESA Section 10(a) Permit issued for the MSHCP.

MSHCP Mitigation Fees. Developments within the MSHCP Plan Area are charged mitigation fees, which are one of the primary sources of funding for implementing the MSHCP.

Fees for projects located within the city limits of Lake Elsinore are payable to the City, while fees for projects in unincorporated Riverside County are payable to the County of Riverside (County).

MSHCP Construction Guidelines. Project construction activities are required to comply with the Construction Guidelines set forth in Section 7.5.3 of the MSHCP.

MSHCP Best Management Practices. The design and construction of projects developed within the MSHCP are required to comply with MSHCP Best Management Practices (BMPs) set forth in Appendix C of the MSHCP.

Stephens' Kangaroo Rat Habitat Conservation Plan. The MSHCP and the SKR HCP are the principal habitat conservation plans in western Riverside County. Riverside County established a boundary in 1996 to protect SKR, a federally and State threatened species. As described in the MSHCP IA, a Section 10(a) Permit and California Fish and Game Code Section 2081 Management Authorization were issued to the Riverside County Habitat Conservation Agency (RCHCA) for the Long-Term SKR HCP and was approved by the USFWS and CDFW in August 1990. Relevant terms of the SKR HCP have been incorporated into the MSHCP and its IA. The SKR HCP will continue to be implemented as a separate HCP; however, to provide the greatest conservation for the largest number of Covered Species, the Core Reserves established by the SKR HCP are managed as part of the MSHCP Conservation Area, consistent with the SKR HCP. Actions shall not be taken as part

of the implementation of the SKR HCP that will significantly affect other Covered Species. Take of SKR outside of the boundaries but within the MSHCP area is authorized under the MSHCP and the associated permits.

3.4.4.4 Local Regulations

City of Lake Elsinore General Plan Policies. The goals and policies outlined in the City's General Plan related to biological resources include:

> **Biological Resources (Section 4.2)**
>
> **Policy 1.1:** The City shall continue to participate in the Western Riverside County Multiple Species Habitat Conservation Plan, the LEAPS program, and the Implementing Agreement; with a strategy that focuses on quality assemblage of conservation acreage. The City shall work toward the lower end of the conservation acreage range as promised by the County during the adoption of the MSHCP by the City.
>
> **Policy 1.4:** Encourage revegetation with native plants compatible with natural surrounding habitat where soils have been disturbed during construction, and discourage plants identified in the MSHCP as unsuitable for conservation areas.
>
> **Policy 2.1:** Biological resources analyses of proposed projects shall include discussion of potential impacts on any plant or wildlife species that is officially listed as threatened or endangered by the USFWS and/or CDFW but not covered by the MSHCP.
>
> **Policy 2.2:** Development or modification shall be discouraged in areas containing riparian habitat of high functions and values or corridors with 80% or more of natural native habitat that link larger patches of natural native habitat containing 80% or more native plant species. Further, development in areas described for conservation, including areas planned for riparian/riverine restoration included in the MSHCP shall also be discouraged.
>
> **Policy 2.3:** The City shall encourage the development of a Native Tree Planting and Maintenance Program that presents guidelines for selecting and locating trees to support wildlife, improve air and water quality, and reduce energy consumption.

City of Lake Elsinore Municipal Code. Section 5.116 of the Municipal Code establishes Tree Preservation Regulations that are described below.

> **Section 5.116 (Significant Palm Trees).** This section serves to outlines its purpose to protecting significant palms are defined by the Code as species of the family Palmaceae that, unless specifically provided otherwise, exceed 5 feet in height measured from the ground at the base of the trunk to the base of the crown. City

Municipal Code requires that permits be obtained for the removal or relocation of significant palms.[56]

3.4.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed Project would have a significant adverse impact with respect to air quality if it would:

Threshold 3.4.1: 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 CDFW or USFWS,

Threshold 3.4.2: 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 CDFW or USFWS,

Threshold 3.4.3: 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,

Threshold 3.4.4: 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,

Threshold 3.4.5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or

Threshold 3.4.6: Conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.

3.4.6 Project Impacts

Threshold 3.4.1: **Would the project 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 CDFW or USFWS?**

Less than Significant with Mitigation Incorporated. To address regional biological resources and habitat sustainability, the MSHCP was developed in 2001 by the County of Riverside in cooperation with State and federal agencies. The MSHCP applies to unincorporated and incorporated Riverside County land, excluding Native American tribal land, west of the crest of the San Jacinto Mountains to the Orange County line. It applies to a total area of approximately 1.26 million acres (approximately 1,997 square miles) and is one of the largest conservation plans in the United States. The MSHCP

[56] City of Lake Elsinore. Lake Elsinore Municipal Code § 5.116.010. Website: https://www.codepublishing.com/CA/LakeElsinore/html/ LakeElsinore05/LakeElsinore05116.html#5.116.010 (accessed September 8, 2025).

covers multiple species and multiple habitats within multiple jurisdictions. The City is a member agency to the MSHCP.

The MSHCP was conceived and developed, and is being implemented specifically to address the direct, indirect, cumulative, and growth-related effects on covered species resulting from build out of planned land use and infrastructure, including the proposed Project. The MSHCP involves efforts by the County, State, and federal governments; the 18 cities in western Riverside County; and private and public entities engaged in construction activities that potentially affect the species covered under the MSHCP. The MSHCP specifies an obligation of local projects, both public and private, to mitigate their impacts on species.

Biological resources on the Project site were evaluated through various reconnaissance-level biological resource assessments and focused field studies conducted at the site between 2020 and 2025 including: general biological field survey, vegetation mapping, burrowing owl habitat suitability assessment, focused burrowing owl surveys, focused fairy shrimp surveys (wet and dry), focused LBV, focused SWFL surveys, rare plant surveys, CBB surveys, and a jurisdictional delineation as detailed in the Biological Resource Assessment and MSHCP Consistency Analysis (Appendix D-1).

The Project site is located within the boundaries of the MSHCP and is mapped within MSHCP Criteria Cells 4157, 4166, 4169, and 4266 and Cell Group W (Criteria Cells 4060 and 4067); the burrowing owl survey area; NEPSSA; and CASSA for plants. The Project site supports nine vegetation communities and land covers, including Akali Grassland, Akali Playa, Disturbed/Developed, Open Water, Riversidean Sage Scrub, Semi-Natural Herbaceous Grassland, Disturbed Semi-Natural Herbaceous Grassland, Southern Willow Riparian Scrub, and Vernal Pool.

Project implementation would result in permanent impacts to eight of the nine vegetation communities, excluding Alkali Playa. These impacts would be considered potentially significant due to the incremental loss of the habitat types and subsequent impacts to special-status species. Table 3.4.H describes impact totals for vegetation within Criteria Cells, and Table 3.4.I describes impact totals for vegetation outside Criteria Cells.

Several special-status species were detected as occurring within the Project site, as discussed above in Section 3.4.3.3, including: San Diego ambrosia, San Jacinto Valley crownscale, vernal barley, Coulter's goldfields, small-flowered microseris, CBB, western spadefoot, Cooper’s hawk, California horned lark, yellow-breasted chat, yellow warbler, and LBV. Additionally, little mousetail may be present on site despite not being detected during focused surveys, and burrowing owl may inhabit the site prior to construction despite not being detected during focused surveys because suitable habitat is present. **Mitigation Measures (MMs) BIO-1** through **BIO-9** have been identified to address potential impacts to special-status species found within the site and reduce potential impacts to a less than significant level.

Table 3.4.H: Vegetation Impacts Within Criteria Cells

Vegetation Community/ Land Use	Impacted				Avoided	Total Acreage
	Industrial Project – On Site (acres)	Baker Street – Offsite (part of Off-site Improvement Area)	Construction/ Improvements Buffer (acres)	Additional Street Improvements (part of Off-Site Improvement Area)	RCA Conserved Lands (Restoration Area)	
Akali Grassland	0	0.07	0.39	0	3.13	**3.59**
Akali Playa	0	0	0	0	0.73	**0.73**
Disturbed/Developed	1.27	1.48	0.22	15.61	1.50	**20.08**
Open Water	0	0	0	0	0.09	**0.09**
Riversidean Sage Scrub	2.42	0.04	0	0.03	0	**2.49**
Semi-Natural Herbaceous Grassland	18.63	0.14	0.17	0.40	19.54	**38.88**
Disturbed Semi-Natural Herbaceous Grassland	11.93	2.72	1.49	0.20	4.38	**20.72**
Southern Willow Riparian Scrub	0	0	0	0.06	1.08	**1.14**
Vernal Pool	0	0	0.17	0	1.55	**1.72**
Totals	**34.25**	**4.45**	**2.44**	**16.30**	**32.00**	**89.44**

Source: Glenn Lukos Associates, Inc., *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 5-1 (September 2, 2025) (Appendix D-1).
Note: Disturbed/Developed Land Cover does not include 4.03 acres of existing roadway within the off-site improvements that were not surveyed.
GLA = Glenn Lukos Associates, Inc.

Table 3.4.I: Vegetation Impacts Outside Criteria Cells

Vegetation Community/ Land Use	Impacted				Avoided	Total Acreage
	Industrial Project – On Site (acres)	Baker Street – Offsite (Part of Off-site Improvement Area)	Construction/ Improvements Buffer (acres)	Additional Street Improvements (Part of Off-Site Improvement Area)	RCA Conserved Lands (Restoration Area)	
Akali Grassland	0	0	0	0	0	0
Akali Playa	0	0	0	0	0	0
Disturbed/Developed	0.44	0.80	0	9.38	0	10.62
Open Water	0	0	0	0	0	0
Riversidean Sage Scrub	0.47	0.05	0	0	0	0.52
Semi-Natural Herbaceous Grassland	27.11	0.73	0.29	1.05	1.66	30.84
Disturbed Semi-Natural Herbaceous Grassland	3.54	0.08	0	0.97	0	4.59
Southern Willow Riparian Scrub	0	0	0	0	0	0
Vernal Pool	0	0	0	0	0	0
Totals	**31.56**	**1.66**	**0.29**	**11.40**	**1.66**	**46.57**

Source: Glenn Lukos Associates, Inc., *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 5-1 (September 2, 2025) (Appendix D-1).
Note: Disturbed/Developed Land Cover does not include 4.03 acres of existing roadway within the off-site improvements that were not surveyed.
GLA = Glenn Lukos Associates, Inc.

Protocol rare plant surveys conducted in 2020 and 2022 detected San Diego ambrosia within the development footprint and Restoration Area. Impacts to San Diego ambrosia would be potentially significant due to this species occupying the site and being protected under FESA. To mitigate the loss of San Diego ambrosia within the development footprint (0.44 acre), a San Diego Ambrosia Translocation Plan (Ambrosia Plan) would be developed through implementation of **MM BIO-1** to ensure no net loss of San Diego ambrosia habitat and restoration of 1.32 acres of habitat within the Restoration Area. Direct impacts to San Diego ambrosia can be mitigated and would be reduced to less than significant levels with implementation of **MM BIO-1.**

Protocol rare plant surveys conducted in 2020 and 2022 also detected Coulter's goldfields within the development footprint and Restoration Area. Through Project implementation, impacts to Coulter's goldfields would be potentially significant due to this species occupying the site. To mitigate the loss of Coulter's goldfields within the development footprint (0.50 acre), the Project would restore/expand Coulter's goldfields habitat within Vernal Pool 3 (0.75 acre), within the Alberhill Creek floodplain (0.75 acre), and the development of a Habitat Mitigation Monitoring Plan (HMMP) to address mitigation for Coulter's goldfields. Direct impacts to Coulter's goldfields can be mitigated and would be reduced to less than significant levels with implementation of **MM BIO-2,** which requires the development of an HMMP to address mitigation for Coulter's goldfields within Vernal Pool 3 and within the Alberhill Creek floodplain.

Protocol CBB surveys conducted in 2024 detected CBB within the development footprint, but this species was not detected during CBB surveys conducted in 2025 (see Figure 3.4-3). Impacts to CBB would be potentially significant due to this species occupying the Project site prior to development of the Project, as well as due to this species occupying the site in 2024 and being protected under CESA. Direct impacts to CBB can be mitigated by implementation of **MM BIO-3,** which dictates updated focused CBB surveys immediately prior to site disturbance, and **MM BIO-4,** which dictates the restoration of 25.58 acres of the Restoration Area by removing nonnative plant resources. Implementation of **MMs BIO-3** and **BIO-4** would reduce Project impacts to less significant levels for impacts to CBB.

GLA biologists conducted a habitat assessment for burrowing owl on April 13, 2020, for the Project site in accordance with MSHCP protocol. Due to there being suitable habitat for burrowing owl within the Project site and surrounding 500-foot buffer, focused burrowing owl surveys were conducted between March 9, 2022, and June 3, 2022. Focused surveys concluded that burrowing owl does not currently occupy the site; however, a single pellet within the Restoration Area was identified (Figure 3.4-4). Since suitable habitat is present on site, potential for burrowing owl to occupy the site in the future is possible and would be potentially significant without the implementation of mitigation measures. Direct impacts to burrowing owls would be reduced to less than significant levels with the implementation of which **MM BIO-5,** requires a preconstruction presence/absence survey for burrowing owls within 30 days prior to site disturbance.

LBV and SWFL focused surveys were conducted in 2020 in accordance with the 2010 USFWS survey guidelines. Although SWFL was not detected, LBV was detected in almost every survey that occurred adjacent to Alberhill Creek. See Figure 3.4-5 for occupied LBV habitat. If construction is to begin during the LBV breeding season (March 15 to September 30), impacts to LBV would be potentially significant due to nesting birds being protected under the California Fish and Game Code and LBV being protected

under CESA and FESA. LBV territory is directly adjacent to proposed off-site improvements and approximately 0.25 mile northeast of on-site improvements; therefore, indirect effects such as noise, dust, and vibration may be potentially significant. Indirect impacts to LBV from development of the Project site would be reduced to less than significant levels with implementation of **MMs BIO-6** and **BIO-7** by ensuring the installation of sound barriers and conducting environmental awareness training, pre-construction focused LBV surveys, and noise monitoring.

If construction is to begin during the bird breeding season (February 1 through September 15), impacts to nesting birds, including special-status birds, could occur. Similar to the on-site improvements section, direct impacts to sensitive and common avian species from development of the Project site would be reduced to less than significant levels with the implementation of **MM BIO-8** by ensuring that nesting birds would be protected until the young have fledged.

GLA biologists conducted focused fairy shrimp surveys (wet and dry) in 2021 and 2022 for the Project site in accordance with MSHCP protocol. While listed fairy shrimp species were not detected, western spadefoot tadpoles were observed within Vernal Pools 1, 2, and 3. Impacts to western spadefoot would be potentially significant due to potential for this species to occupy the development footprint and due to spadefoot being protected under FESA. Direct impacts to western spadefoot would be avoided and reduced to less than significant levels with implementation of **MM BIO-9.** These measures prohibit disturbance of vernal pools prior to clearance of western spadefoots, installation of construction fencing along all project components prior to construction, installation of exclusionary fencing around all disturbance areas, hydrology monitoring during the western spadefoot breeding season, western spadefoot clearance prior to pool inundation, monitoring of exclusionary fencing, and monitoring of vernal pools for metamorphs.

Additionally, these impacts have been offset and reduced to a less than significant level through the conservation of approximately 33.66 acres within the Project site, known as the Restoration Area, as discussed in Section 3.4.3. The Restoration Area is within the northeastern portion of Criteria Cell 4166 that includes and is adjacent to Alberhill Creek/Collier Marsh and consists of Alkali Grassland, Alkali Playa, Disturbed/Developed, Open Water, Semi-Natural Herbaceous Grassland, Disturbed Semi-Natural Herbaceous Grassland, Southern Willow Scrub, and Vernal Pool. The Restoration Area had the following special-status species detected: San Diego ambrosia, San Jacinto Valley crownscale, vernal barley, Coulter's goldfields, small-flowered microseris, LBV, western spadefoot, yellow warbler, and yellow-breasted chat. Several types of mitigation are proposed within the Restoration Area, as discussed above.

As part of its involvement in the MSHCP, the Project would pay MSHCP Local Development Mitigation Fees, which will support the funding, acquisition, and preservation of lands that are part of the MSHCP Reserve. Payment of the mitigation fees and compliance with all applicable requirements of the MSHCP provide full mitigation under CEQA, the National Environmental Policy Act (NEPA), FESA, and CESA for impacts to MSHCP-covered species and habitats. The MSHCP also addresses indirect impacts through Cores and Linkages, Criteria Cells, and MSHCP fees. Implementation of **MMs BIO-1** through **BIO-9,** as applicable, would reduce potential impacts on special-status species associated with Project implementation to **less than significant with mitigation incorporated**.

Threshold 3.4.2: **Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**

Less than Significant with Mitigation Incorporated. MSHCP Section 6.1.2 requires the assessment of impacts to riparian habitats, riverine areas, and vernal pools, including focused surveys for sensitive riparian species when suitable habitat is present. GLA biologists conducted an evaluation of the site and its MSHCP Riparian/Riverine areas in April 2020. Following this, a jurisdictional delineation was conducted in February 2021 and April and July 2022. As detailed in Section 3.4.3.4, the Project site consists of six ephemeral drainages (Drainages A, B, C, D, E, and F), three vernal pools (Vernal Pools 1, 2, and 3), one stock pond, and Alberhill Creek. As detailed in Table 3.4.J, the Project site contains 3.03 acres of MSHCP riparian/riverine areas (see Figure 3.4-6). Of this, 2.36 acres are associated with Alberhill Creek, consisting of 1.14 acres of Southern Willow Riparian Scrub, 0.73 acre of Alkali Playa, 0.09 acre of Open Water, and 0.40 acre of Semi-Natural Herbaceous Grassland. Additionally, 1.72 acres of vernal pools are present on site, as detailed in Table 3.4.J.

Table 3.4.J: MSHCP Riparian/Riverine

Feature	Riverine (acres)	Riparian (acres)	Total (acres)
Alberhill Creek	–	2.36	2.36
Drainage A	0.18	–	0.18
Drainage B	0.13	–	0.13
Drainage C	0.03	–	0.03
Drainage D	0.09	–	0.09
Drainage E	0.04	–	0.04
Drainage F	0.20	–	0.20
Total	**0.67**	**2.36**	**3.03**

Source: Glenn Lukos Associates, Inc. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 4-7 (September 2, 2025) (Appendix D-1).

As detailed in Table 3.4.K, the proposed Project would permanently impact 0.50 acre of riverine areas and 0.17 acre of vernal pools and impacts would be potentially significant. Impacts to the 0.67 acre of MSHCP riparian/riverine areas would be reduced to a less than significant level through application of **MM BIO-10.** A minimum 1:1 of re-establishment credits (0.50 acre) and purchase of re-habilitation credits from the Riverpark Mitigation Bank (1.0 acres) would be implemented. Impacts to vernal pools (0.17 acre) would be mitigated by expanding Vernal Pools 2 and 3 on the northern side at a minimum 3:1 replacement ratio (0.51 acre) and through enhancement of alkali grassland habitat. The Project shall provide a receipt to show proof of purchase for the mitigation credits as detailed in **MM BIO-11.** Additionally, the Project would also develop a San Diego Ambrosia Translocation Plan and a Habitat Mitigation and Monitoring Plan (HMMP), as previously described in **MMs BIO-1** and **BIO-2.**

Table 3.4.K: Impacts to Jurisdictional Waters

Feature	RWQCB Nonwetland (acres)	RWQCB Wetland (acres)	RWQCB Total Impacts (acres)	CDFW Non-Riparian Stream (acres)	CDFW Riparian Stream (acres)	CDFW Total Impacts (acres)
Drainage A	0.04	–	0.04	0.05	–	0.05
Drainage B	0.13	–	0.13	0.13	–	0.13
Drainage C	0.03	–	0.03	0.03	–	0.03
Drainage D	0.07	–	0.07	0.09	–	0.09
Drainage F	0.20	–	0.20	0.20	–	0.20
Vernal Pool 2	–	0.01	0.01	–	–	–
Vernal Pool 3	–	0.16	0.16	–	0.16	0.16
Total	**0.47**	**0.17**	**0.64**	**0.50**	**0.16**	**0.66**

Source : Glenn Lukos Associates, Inc. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Tables 5-3 and 5-4 (September 2, 2025) (Appendix D-1).

Implementation of **MMs BIO-1, BIO-2, BIO-10,** and **BIO-11** would reduce potential impacts on MSHCP riparian/riverine habitat associated with Project implementation to **less than significant with mitigation incorporated**.

Threshold 3.4.3: **Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

Less than Significant with Mitigation Incorporated. As discussed above in Threshold 3.4.2 and Section 3.4.3.4, the Project site consists of three vernal pools (Vernal Pools 1, 2, and 3) and Alberhill Creek. As detailed in Table 3.4.F, the Project site has vernal pools consisting of 1.72 acres of RWQCB wetland WOTS and Alberhill Creek, which consists of 2.33 acres of USACE wetland WOTUS/RWQCB wetland WOTS. The Project does not propose impacts to Alberhill Creek, as it occurs within the Restoration Area. Project implementation would result in 0.17 acre impacts to vernal pools (Vernal Pools 2 and 3). As discussed above in Threshold 3.4.2, direct impacts to vernal pools that may be potentially significant and can be reduced to less than significant levels with implementation of **MMs BIO-1, BIO-2, BIO-10,** and **BIO-11.**

Focused fairy shrimp surveys conducted in 2023 and 2024 did not detect listed fairy shrimp species on site. Therefore, the Project would not have impacts to listed fairy shrimp species. During focused fairy shrimp surveys, western spadefoot tadpoles were detected. As discussed in Threshold 3.4.1, direct impacts to western spadefoot may be potentially significant and can be reduced to less than significant levels with implementation of **MMs BIO-1** through **BIO-2** and **BIO-9.** Implementation of **MMs BIO-10** and **BIO-11,** as applicable, would reduce potential impacts on vernal pools and associated special-status species to **less than significant with mitigation incorporated**.

Threshold 3.4.4: **Would the project 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 with Mitigation Incorporated. The Project site is within the Elsinore Area Plan of the MSHCP. The Project site is within Criteria Cells 4157, 4166, 4169, and 4266 and Cell Group W (Cell 4060 and 4067). However, the development footprint is not within areas described for conservation or development is within existing roadways (not planned for road expansion). The Project site was evaluated for its function as a wildlife corridor that species would use to move between wildlife habitat zones. Features (e.g., mountain canyons and riparian corridors) typically used by wildlife as corridors are present within the Project site.

A majority of the Project site is located within Criteria Cell 4166, which will contribute to the assembly of Proposed Linkage 2, specifically habitat consisting of Alberhill Creek/Collier Marsh and Temescal Creek. Through Project implementation, Alberhill Creek/Collier Marsh will not be impacted. Instead, 33.66 acres have been conserved and would be enhanced (i.e., the Restoration Area). This includes conservation of 32 acres within Criteria Cells 4067 and 4166, as shown in Table 3.4.L. These conserved lands contribute to the assembly of Proposed Linkage 2.

Table 3.4.L: Criteria Cell Acreage

Criteria Cell	Riverine (acres)	Riparian (acres)	RCA Conserved Lands (Restoration Area) (acres)	Total (acres)
4060 (Cell Group W)	–	1.26	–	1.26
4067 (Cell Group W)	0.18	3.39	1.89	5.28
4157	0.13	2.83	–	2.83
4166	0.03	9.90	30.11	74.26
4169	0.09	3.26	–	3.26
4266	0.04	2.55	–	2.55
Total	**34.25**	**23.19**	**32.00**	**89.44**

Source: Glenn Lukos Associates, Inc., *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California,* Table 1-2 (September 2, 2025.)(Appendix D-1).

The Project would support MSHCP goals relating to wildlife movement through conservation of the 33.66-acre Restoration Area. Thus, impacts to wildlife corridors or nursery sites are not expected from construction or operational activities of the proposed Project.

Section 6.1.4 of the MSHCP identifies guidelines to address indirect effects associated with development in proximity to the MSHCP Conservation Area. The site consists of a Restoration Area that has been added to the MSHCP Reserve as Additional Reserve Lands (ARL). As part of its development approval process, the City generally requires the imposition of conditions (as necessary) to promote compliance with Section 6.1.4 of the MSHCP. The Section 6.1.4 Guidelines include:

- **Drainage:** Incorporation of measures to ensure the quantity and quality of runoff does not adversely alter or degrade biological resources or ecosystems. The Project includes **Regulatory Compliance Measures (RCMs) WQ-1** through **WQ-4** to ensure compliance with the National Pollutant Discharge Elimination System (NPDES) requirements; control erosion and sedimentation, ensure water quality, and satisfy drainage and Municipal Separate Storm Sewer System (MS4) Permit requirements (see Section 3.10, Hydrology and Water Quality).

- **Toxics:** Incorporation of measures to ensure the use of chemicals or chemical byproducts does not result in discharges to MSHCP Conservation Areas. The Project includes **RCM HAZ-1,** requiring the preparation of a Hazardous Materials Business Plan (HMBP) that governs the treatment of hazardous materials during on-site construction and operation (see Section 3.9, Hazards and Hazardous Materials).

- **Lighting:** Incorporation of shielding for Project lighting and directing such lighting away from MSHCP Conservation Areas. The City's Municipal Code provides lighting guidelines governing general lighting throughout Lake Elsinore (Municipal Code Section 17.112.040) and lighting for parking requirements (Municipal Code Section 17.148.110). The City's general lighting requirement requires that "outdoor lighting fixtures in excess of 60 watts shall be oriented and shielded to prevent direct illumination above the horizontal plane passing through the luminaire and prevent any glare or direct illumination on adjacent properties or streets." Additionally, all lighting shall be directed away from the MSHCP Conservation Area (see Section 3.1, Aesthetics).

- **Noise:** For planning purposes, ensuring noise in MSHCP Areas does not exceed the exterior residential noise standard. Operation of the proposed Project would not result in long-term exceedances of the City's exterior residential noise standard (see Section 3.13, Noise).

- **Invasive Species:** Prohibition of invasive or nonnative plant species in areas adjacent to MSHCP Conservation Areas. The Project's conceptual landscape plan includes a variety of native and drought-tolerant species (see Section 3.1, Aesthetics). Additionally, due to being in a Very High Fire Hazard Severity Zone, a Fuel Modification Plan would include, but is not limited to, fire-resistive, native plant species in landscaping. The final landscape material proposed and landscape plan shall be approved by the City and would conform to applicable water-efficient and drought-tolerant requirements.

Project implementation may result in potentially significant impacts to nesting birds if construction occurs during the bird breeding season (typically February 1 through September 15). The Project site may be used by hawks, ravens, or other common or special-status open-ground birds for nesting. Shrubs and other vegetation may provide nest sites for smaller birds, and burrowing owls may nest in ground squirrel burrows, pipes, or similar features. Most birds and their active nests are protected from "take" (meaning destruction, pursuit, possession, etc.) under Sections 3503–3801 of the California Fish and Game Code. Activities that cause destruction of active nests, or that cause nest abandonment and subsequent death of eggs or young, may constitute violations of this law. To avoid potential effects to fully protected raptors, special-status bird species, and other nesting birds protected by the California Fish and Game Code, and for compliance with MSHCP ITP Condition 5, State regulations require a nesting bird preconstruction survey to be conducted by a qualified biologist no more than 3 days prior to ground-disturbing activities. Should nesting birds be found, an exclusionary buffer would be established by the qualified biologist. The nesting bird preconstruction survey and exclusionary buffer (as necessary) would be implemented through **MM BIO-8** as described above. Additionally, **RCMs HAZ-1** and **WQ-1** through **WQ-4** would ensure indirect effects associated with development in proximity to the MSHCP Conservation Area remain less than significant. With implementation of **MM BIO-8** and **RCMs HAZ-1** and **WQ-1** through **WQ-4,** impacts to nesting birds

and indirect effects associated with development in proximity to the MSHCP Conservation Area would be reduced to **less than significant with mitigation incorporated.**

Threshold 3.4.5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less than Significant with Mitigation Incorporated. The Project site lies within the MSHCP boundaries. As discussed previously in Threshold 3.4.1, the proposed Project as designed, with mitigation applied, would comply with all applicable policies and ordinances protecting biological resources. Special-status plant and wildlife species and water resources occur within the Project site; as a result, impacts to these biological resources may be potentially significant. Therefore, **MMs BIO-1** through **BIO-11** would be implemented to reduce impacts to **less than significant with mitigation incorporated**.

Implementation of the Project is subject to all applicable federal, State, and local policies and regulations related to the protection of biological resources and tree preservation. Additionally, the Project is required to comply with the City's Significant Palm Tree ordinance (Section 5.116 of the Municipal Code). While protected trees may occur within the Restoration Area, no protected trees exist within the development footprint; therefore, the Project would not be subject to the City of Lake Elsinore's Significant Palm Tree ordinance.

Threshold 3.4.6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less than Significant with Mitigation Incorporated. The Project site lies within the MSHCP. As discussed in Section 3.4.2.1, the site is within a NEPSSA, a CASSA for plants, and MSHCP designated survey areas for burrowing owl. The Project site is not within an MSHCP-designated amphibian or mammal survey area. Additionally, the Project site is within MSHCP Criteria Cells 4157, 4166, 4169, and 4266 and Cell Group W (Cells 4060 and 4067).

As described in Threshold 3.4.1, the Project would pay MSHCP Local Development Mitigation Fees, which would support the funding, acquisition, and preservation of lands that are part of the MSHCP Reserve. Payment of the mitigation fees and compliance with all applicable requirements of the MSHCP would provide full mitigation under CEQA, NEPA, FESA, and CESA for impacts to MSHCP-covered species and habitats. The MSHCP also addresses indirect impacts through Cores and Linkages, Criteria Cells, and MSHCP fees. Further, **MMs BIO-1** through **BIO-11** would be implemented to reduce impacts to **less than significant with mitigation incorporated**.

3.4.7 Level of Significance Prior to Mitigation

Prior to mitigation, impacts related to biological resources, including jurisdictional waters, special-status plants, special-status wildlife, MSHCP riparian/riverine, and vernal pools, would be potentially significant.

3.4.8 Regulatory Compliance Measures and Mitigation Measures

MM BIO-1 **San Diego Ambrosia Translocation Plan.** To mitigate the loss of 0.44 acre of habitat with long-term conservation value for San Diego ambrosia, the Project shall develop and implement a San Diego Ambrosia Translocation Plan (Ambrosia Plan). The Ambrosia Plan shall identify proposed receiver sites within the Restoration Area where ambrosia stems and where soils will be translocated. The receiver sites shall be located within a minimum of 1.32 acres of contiguous degraded habitat in the Alberhill Creek floodplain to be restored by the Project. The proposed restoration area consists of an area dominated by nonnative grasses and forbs where San Diego ambrosia was detected in the past (per public records), but due to overgrowth by invasive vegetation, San Diego ambrosia was not detected during plant surveys for the Project. The general components of the Ambrosia Plan shall include the salvage and collection of individual ambrosia stems from the donor sites. Approximately 10 percent of the stems shall be salvaged and stored at a nursery facility for propagation, to be held as a contingency source. Another 20 percent of the stems shall be translocated directly to the receiver sites, where the stems will be transplanted into study plots. The remaining stems shall be collected along with the soils, which shall be transferred in bulk to the receiver sites. The expectation is that through rhizome spread, both within the plots and between the plots, the number of stems will increase. The Ambrosia Plan shall identify proposed salvage and translocation methods from the donor sites, site preparation methods of the receiver sites, plant palettes, success criteria, maintenance/long-term monitoring procedures, and contingency measures. The Ambrosia Plan shall be submitted to the City of Lake Elsinore (City), Regional Conservation Authority (RCA), United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and California Natural Resources Agency (CNRA) for review and approval prior to implementation.

MM BIO-2 **Restore/Expand Coulter's Goldfields Habitat.** To mitigate the loss of 0.50 acre of habitat with long-term conservation value for Coulter's goldfields, the Project shall restore/expand Coulter's goldfields habitat in two areas. The first area consists of the expansion of habitat associated with Vernal Pool 3 by approximately 0.75 acre. The second area consists of the expansion of another 0.75-acre area in the Alberhill Creek floodplain adjacent to an existing population of Coulter's goldfields and vernal barley. If little mousetail occurs in Vernal Pool 3, then the expansion of the vernal pool shall mitigate those impacts, as it would address all vernal pool flora associated with the Vernal Pool community. However, because there was no confirmation of little mousetail during focused plant surveys, there shall not be any performance standards specific to little mousetail, as there is no recent evidence that little mousetail propagules are present in the edge portion of the vernal pool to be impacted where soil inoculum would be collected prior to impact.

The Project shall develop a Habitat Mitigation Monitoring Plan (HMMP), to be prepared by a habitat restoration specialist, to address the vernal pool mitigation efforts as well as the mitigation for Coulter's goldfields. The HMMP shall, at a minimum, include details about the type of mitigation, acreages, when the mitigation would be implemented, plant palettes, site preparation, weeding plan, success criteria/performance standards, monitoring plan (e.g., years/duration, frequency), reporting, the proposed management entity, and contingency measures in the event the mitigation is not successful. The type of contingency measures would depend on which success criteria/performance standards have not been met. If the mitigation areas are not meeting plant coverage and/or nonnative criteria, then additional plant remediation/maintenance efforts shall be implemented, and the monitoring period shall be extended. The HMMP shall be submitted to the City, CDFW, and USFWS (collectively referred to as Wildlife Agencies) and RCA for review and approval at least 90 days prior to the initiation of Project impacts on the riparian/riverine and vernal pool habitat.

MM BIO-3 **Crotch's Bumble Bee Surveys.** Updated focused surveys shall be performed by a qualified Crotch's bumble bee (CBB) biologist during the colony active period (April to August) immediately prior to the planned disturbance of the site. If CBB is detected within the disturbance footprint, then the Project Applicant shall coordinate with CDFW to determine whether avoidance and minimization measures are feasible to avoid "take" of CBB individuals. If "take" avoidance is determined to be infeasible, then the Project Applicant shall obtain an Incidental Take Permit (ITP) from CDFW. If CBB is not detected during the updated focused surveys, then the results of the focused survey shall be valid until January 31 of the year following the updated focused surveys. If all potential CBB habitat is not removed by January 31 of that year, then focused surveys shall be repeated in a subsequent season for any remaining habitat.

MM BIO-4 **Restoration of RCA Conserved Lands (Restoration Area).** As mitigation for impacts to CBB habitat, the Project has already conserved 33.66 acres of land as part of the Restoration Area, which includes 25.58 acres of grassland with the potential to support CBB foraging, nesting, and/or overwintering. Per Section 6.5 of the *Biological Technical Report for the Baker Industrial Project*, the Project is committing to restore a portion of the 25.58 acres in conjunction with translocating San Diego ambrosia to the Restoration Area. As part of the translocation effort, the Project Applicant shall restore the applicable portion of those lands by removing nonnative plant resources that do not support CBB foraging and revegetating with appropriate floral resources to support CBB foraging. In addition, as part of its participation with the MSHCP, the Project shall pay MSHCP development fees, which will contribute to the funding, acquisition, and conservation of lands contributing to the MSHCP Reserve. The Project's payment of development fees will fund additional

acquisition of lands that will support biological functions for CBB and contribute to the conservation of the species in Western Riverside County. Given the intermittent use of the site by CBB based on the species' presence in 2024 but absence in 2025, the combined measures sufficiently address the loss of habitat for CBB under the California Environmental Quality Act (CEQA) such that impacts to CBB would be reduced to below a level of significance.

MM BIO-5 **Pre-Construction Burrowing Owl Survey.** A pre-construction survey for burrowing owls, performed by a qualified biologist, is required within 30 days prior to future ground-disturbing activities (e.g., vegetation clearing, clearing and grubbing, tree removal, site watering, equipment staging) to ensure that no burrowing owls have colonized the site in the days or weeks preceding the ground-disturbing activities. If burrowing owls have colonized the Project site prior to the initiation of ground-disturbing activities, the Project Applicant shall immediately inform the RCA and the Wildlife Agencies and, going forward, shall coordinate with the RCA and the Wildlife Agencies to determine reasonable and appropriate procedures, including the possibility of preparing a Burrowing Owl Protection and Relocation Plan pursuant to MSHCP guidelines/standards prior to initiating ground disturbance. If ground-disturbing activities occur but cease for more than 30 days, a pre-construction survey shall again be required to ensure that burrowing owls have not colonized the site since it was last disturbed. If burrowing owls are found, the same coordination with the RCA and the Wildlife Agencies described above shall be required.

MM BIO-6 **Environmental Awareness Training and Sound Barriers.** The Project Applicant shall implement an Environmental Awareness Training Program prior to the start of construction to advise workers of sensitive biological areas within Alberhill Creek adjacent to Nichols Road.

If Nichols Road improvements adjacent to the Alberhill Creek riparian habitat will occur during the least Bell's vireo (LBV) breeding season (March 15 to September 30), then reasonable and appropriate measures shall be implemented for any work within 300 feet of the habitat to avoid indirect impacts to LBV. The measures may include the installation of sound barriers, pre-construction surveys, and/or clearance surveys.

The Project Applicant may, but is not required to, install sound barriers along Nichols Road adjacent to Alberhill Creek to prevent any adverse noise effects to LBV during construction. If utilized, the sound barriers shall be installed prior to any work conducted after March 15 and shall remain in place until August 31, unless it is first determined through surveys that LBV are not occupying habitat in the adjacent creek. To confirm the effectiveness of the sound barriers, a qualified biological monitor (Biological Monitor) shall measure noise levels within the creek on the opposite side of the sound barriers from Nichols Road. The Biological Monitor shall determine the

existing ambient noise level and whether noise levels exceed 60 decibels (dB) (or the ambient noise levels) due to construction activities. For areas where pre-construction ambient noise levels exceed 60 dB, pre-construction, ambient noise measurements may be taken by a qualified entity (i.e., Biological Monitor) during the full daylight period (sunrise to sunset). Subsequently, the median average ambient noise level can be used as the baseline in lieu of 60 dB. For any nighttime construction activities, the same would be done as above but with measurements taken during the full nighttime period (sunset to sunrise). If construction noise levels exceed 60 dB or the median average ambient noise level, whichever is greater, then the sound barrier shall be adjusted and measurements shall be retaken. If construction noise levels are determined to be under 60 dB or the ambient noise level, whichever is greater, then construction activities shall continue without any additional noise monitoring.

MM BIO-7 **Pre-Construction Least Bell's Vireo Surveys and Noise Monitoring.** At least three pre-construction surveys and/or clearance surveys shall be conducted for LBV in riparian habitat within Alberhill Creek that is within 300 feet of construction activities. The number of surveys shall depend on when the surveys commence and whether LBV individuals are detected during the surveys. The survey visits shall be conducted by a qualified biologist familiar with songs, whisper songs, calls, scolds, and plumage characteristics of adult and juvenile LBV. The qualified biologist must have experience with nesting ecology and behavior of LBV to determine pre-nesting/nesting behavior. Surveys shall be conducted between sunrise and 11:00 am. Surveys shall not be conducted during periods of excessive or abnormal cold, heat, wind, rain, or other inclement weather that individually or collectively may reduce the likelihood of detection. Any detections of LBV are to be mapped with behavior tracked across detections/sightings.

If construction activities within the 300-foot buffer begin prior to March 15, then weekly surveys shall be conducted by a qualified biologist starting on March 15 (or on the following Monday, if March 15 occurs on a Saturday or Sunday) and shall continue until one or more LBV individuals are detected, or until May 1 if no LBV individuals are detected.

If construction activities within the 300-foot buffer begin after March 15 but before May 1, then at least three weekly surveys shall be conducted starting 1 week prior to the initiation of activities and shall continue until May 1 or later to complete the minimum three surveys, unless one or more LBV individuals are detected.

If sound barriers are installed prior to the initiation of construction activities and one or more LBV individuals are detected within the 300-foot buffer, then noise monitoring shall be conducted as described in MM BIO-6. If the sound barriers are demonstrated to be effective at reducing noise below the stated

thresholds, as described in MM BIO-6, then additional noise monitoring shall not be required. However, the monitoring biologist shall inspect the sound barriers weekly to ensure the barriers are intact and shall advise the Project Applicant if repairs are needed to the sound barriers.

If sound barriers are not installed prior to the start of construction activities, and if LBV are detected at any point during the pre-construction/clearance surveys, then daily noise monitoring shall be conducted between March 15 and September 30. A qualified biological monitor shall measure noise levels at the edge of the occupied habitat and work shall cease if, at any time, noise levels exceed 60 dB due to construction activities or the existing ambient level if that is over 60 dB. Work shall restart if sound barriers are installed and are demonstrated to effectively reduce monitoring in accordance with MM Measure BIO-6.

If it is determined that the sound barriers are not sufficiently reducing noise levels, then the work within 300 feet shall remain halted, and the Project Applicant will contact CDFW and USFWS to discuss if other methods are available to reduce noise levels below the stated threshold.

MM BIO-8 **Pre-Construction Nesting Bird Survey.** As feasible, vegetation clearing should be conducted outside of the nesting season, which is generally identified as February 1 through September 15. If avoidance of the nesting season is not feasible, then a qualified biologist shall conduct a nesting bird survey within three days prior to any disturbance of the site, including disking, demolition activities, and grading. If active nests are identified, the qualified biologist shall establish reasonably adequate buffers around the nests, and the buffer areas shall be avoided until the qualified biologist determines that nests are no longer occupied (e.g., chicks have fledged or the nest failed) and the juvenile birds can survive independently from the nests.

MM BIO-9 **Timing of Disturbance.** No disturbance work, including Project grading and mitigation activities (including vernal pool expansion), shall occur within western spadefoot breeding habitat associated with Vernal Pools 2 and 3 or upland habitat within 1,500 feet of the vernal pools until those areas have exclusionary fencing and have been cleared of western spadefoot during the appropriate winter survey period.

- **Construction Fencing.** Construction fencing, separate from exclusionary fencing (discussed below), shall be installed along all project components to demarcate the Project boundaries. No disturbance shall occur outside the construction fencing. The fencing shall be installed prior to the start of any disturbance, to be verified (including photographed) by the monitoring biologist, and shall remain in place until construction has been completed. Fencing shall include small animal jump-outs in the fencing (e.g., gradually sloped, smooth, flat-topped mounds of dirt on the upland

side of the fence, with small slits placed in the fencing at the top of the mounds). Placement of cover, ideally weathered wood, shall be placed along the inside of the fencing approximately every 50 feet. This cover shall be checked during clearance and monitoring surveys. All animals encountered under the cover shall be placed outside the fencing, with the western spadefoots being moved to the pools as described in MM BIO-9. In general, the fencing shall be inspected periodically and replaced as necessary if it becomes worn or damaged.

- **Exclusionary Silt Fencing.** Exclusionary fencing shall be installed around areas that will be disturbed and shall include the entirety of the Onsite Development Area, Offsite Improvement Area, and Construction/ Improvements Buffer (off site) within 1,500 feet of the vernal pools. Exhibit 15 of the *Biological Technical Report for the Baker Industrial Project* identifies three distinct areas that shall be surrounded by exclusionary fencing, including the entirety of the on-site portion of the Project, the portion of the Baker Street improvements not within the existing road right-of-way and the Construction/Improvements Buffer, and a small area adjacent to Nichols Road and Pierce Street. Fencing shall be installed and maintained prior to the onset of winter rain events. The purpose of the exclusionary fencing shall be to enclose clearance areas for western spadefoot relocation prior to the onset of site disturbance. As with the construction fencing described in MM BIO-9, the exclusionary fencing shall be installed prior to the start of any disturbance, to be verified (including photographed) by the monitoring biologist, and shall remain in place until construction has been completed. In general, the fencing shall be inspected periodically and replaced as necessary if it becomes worn or damaged. After the clearance surveys are completed (as described below), exclusionary fencing shall remain along the disturbance boundary with the Restoration Area until the conclusion of construction activities to prevent any spadefoots from returning into the development footprint following the breeding season. It is acknowledged that construction activities might not immediately follow the breeding season in which the clearance surveys are conducted. If so, exclusionary fencing shall remain along the boundary between the Restoration Area and the development footprint until construction activities are concluded, even if multiple breeding seasons separate the clearance surveys from the start of the construction activities. The exclusionary fencing shall be monitored at least weekly during each breeding season to move any spadefoots into the Restoration Area that might be trapped on the opposite side of the fence. This monitoring shall continue until construction has been completed unless monitoring is terminated (or suspended) with concurrence from the RCA, USFWS, CDFW and CNRA.

- **Hydrology Monitoring.** If construction activities occur within the Baker Street alignment or the Construction/Improvements Buffer during the western spadefoot breeding season, a qualified biologist shall monitor the hydrology of the vernal pools after the first measurable rains to determine the earliest timeframe that western spadefoot individuals could initiate breeding.

- **Western Spadefoot Clearance Prior To Pool Inundation.** After installation of construction fencing and exclusionary fencing, a qualified biologist shall perform clearance surveys and relocations during the first four large (0.25-inch or greater) rain events of the winter. The clearance surveys shall be conducted for each of the three areas described above. In addition, although existing Baker Street and Pierce Street shall not be enclosed by fencing since they have existing rights-of way, the surfaces of the dirt roads shall be surveyed along with the three exclusion zones, and any spadefoots detected on the road surfaces shall be captured and relocated. The surveys should be performed at nighttime, during each of the four rain events, or the next night following each of the four rain events. Clearance surveys shall involve walking 30-meter-or-less pedestrian transects within the exclusion fenced area while looking for western spadefoot eyeshine and individuals. Dense vegetation may require that transects be more closely spaced such that 100 percent visual coverage is provided. The qualified biologist shall perform 360-degree scans at least every 100 meters to look for eyeshine behind them. If a western spadefoot is detected, the qualified biologist shall go to the location, GPS the location, collect basic data (sex, size, behavior [e.g., emerging, walking/direction, foraging], etc.) as feasible, quickly scan 360 degrees to see if there are other individuals emerging nearby, collect the individual in a bucket for relocation, then continue along the transect route. The qualified biologist shall employ safe handling techniques to prevent directly harming individual spadefoots and prevent introducing pathogens to individual spadefoots. This shall include wearing a clean pair of disposable gloves when handling each spadefoot collected and keeping the collected spadefoots in a sterilized bucket until they are transferred to the vernal pools. Additional methods may be employed, as applicable, according to *The Declining Amphibian Task Force Fieldwork Code of Practice.* After completion of the clearance survey, all collected western spadefoots shall be evenly distributed around Vernal Pools 1 through 3. If the pools are inundated, then western spadefoots shall be placed at the water's edge of the pools. If the pools have yet to inundate, then western spadefoots shall be placed within the entrance of rodent burrows above, but within 10 meters, of the high-water line of the pools. Released individuals shall be monitored long enough to verify that they are moving and apparently healthy.

- **Western Spadefoot Monitoring During Construction (and During the Interim Between Clearance Survey Areas and Construction).** After the clearance surveys are complete and until construction activities are concluded, during the western spadefoot breeding season(s), the biologist shall monitor the exclusionary fencing separating the Restoration Area from the development footprint. The biologist shall inspect the side of the exclusion fencing facing the construction site at least once per week to search for western spadefoot individuals that might be trapped inside of the exclusionary fencing. If individuals are detected inside of the fence, they shall be relocated to the opposite side of the fencing and placed just outside the inundation limits of the pools. The biologist shall inspect the surface of the pools to be impacted within disturbance limits (i.e., in the area separated from the avoided pools by the exclusion fence, as well as within any deep cracks that have formed in substrate). If spadefoots are detected within cracks, the biologist shall carefully attempt to remove spadefoots by hand and relocate them to inside the fencing demarcating the disturbance limits. If multiple breeding seasons will separate the clearance surveys from the start of construction activities, then the exclusionary fencing shall remain in place and the monitoring shall be performed for each breeding season until the start of construction, unless monitoring is terminated (or suspended) with concurrence from the RCA, USFWS, CDFW and CNRA.

- **Monitoring During Initial Disturbance.** A qualified biologist shall monitor the initial ground disturbance (i.e., start of work) to Vernal Pools 2 and 3 for any spadefoot metamorphs that might escape soil cracks while equipment initially disturbs the soil. The initial disturbance of the pools shall be conducted using small equipment such as a backhoe. The disturbance shall be directed by the monitoring biologist to commence slowly from the outer edge of the pools toward the disturbance limits. If the biologist observes a metamorph escaping a crack, the biologist shall halt the equipment and attempt to relocate the metamorph to the opposite side of the silt fencing.

MM BIO-10 **Mitigation Lands.** The Project shall mitigate impacts to 0.50 acre of Riverine Areas off site through the purchase of mitigation credits from the Riverpark Mitigation Bank. The mitigation credits shall include a minimum 1:1 of re-establishment credits (0.50 acre) and 2:1 of re-habilitation credits (1.0 acre). The Project shall mitigate impacts to 0.17 acre associated with Vernal Pool 2 and Vernal Pool 3 by expanding the existing vernal pools on the opposite (northern) side from the proposed impacts by at least 0.51 acre (minimum 3:1 replacement ratio) and enhance adjacent Alkali Grassland habitat. In conjunction with the rare plant mitigation, the Project shall include rare plant species in the vernal pool expansion area, such as Coulter's goldfields. The Project Applicant shall develop a Habitat Mitigation and Monitoring Plan

(HMMP), to be prepared by a qualified habitat restoration specialist, that will identify site preparation methods, the proposed plant palette, proposed success criteria, and maintenance/long-term monitoring procedures. The HMMP shall be submitted to the City, Wildlife Agencies, and RCA for review and approval at least 90 days prior to the initiation of Project impacts on the riparian/riverine and vernal pool habitat.

MM BIO-11 **Receipt for Purchased Credits.** The Project Applicant shall provide proof of the completed purchase of the mitigation credits to the City and the Wildlife Agencies before issuing the grading permit for the Project. Proof of purchase shall consist of (1) a receipt from the Riverpark Mitigation Bank for the Project Applicant's purchase of at least 0.50 acre of riparian re-establishment credits and 1.0 acres of rehabilitation credits; and (2) a copy of the purchase contract/purchase agreement between the Riverpark Mitigation Bank and the Project Applicant. The purchase agreement must name Baker Street Industrial Project as the development project for which the mitigation credits are being purchased.

RCM HAZ-1 **Hazardous Materials Business Plan.** *(See Section 3.9, Hazards and Hazardous Materials)*

RCM WQ-1 **Construction General Permit and Chapter 14.08 of the City of Lake Elsinore Municipal Code.** *(See Section 3.10, Hydrology and Water Quality)*

RCM WQ-2 **Groundwater Discharge Permit.** *(See Section 3.10, Hydrology and Water Quality)*

RCM WQ-3 **Riverside County MS4 Permit.** *(See Section 3.10, Hydrology and Water Quality)*

RCM WQ-4 **Industrial General Permit.** *(See Section 3.10, Hydrology and Water Quality)*

3.4.9 Level of Significance after Mitigation

Implementation of MMs BIO-1 through BIO-11 and RCMs HAZ-1 and WQ-1 through WQ-4 would ensure the Project would include mitigation or avoidance for San Diego ambrosia, Coulter's goldfields, CBB, burrowing owl, LBV, nesting birds, western spadefoot, MSHCP riparian/riverine habitat, and vernal pools; protection of these resources through implementation of a HMBP during on-site construction and operation to ensure the use of chemicals or chemical byproducts does not result in discharges to MSHCP Conservation Areas; compliance with the NPDES requirements; control of erosion and sedimentation; protection of water quality; and compliance with drainage and Permit requirements. With implementation of MMs BIO-1 through BIO-11 and RCMs HAZ-1 and WQ-1 through WQ-4, potential impacts to biological resources would be reduced to **less than significant with mitigation incorporated**.

3.4.10 Cumulative Impacts

According to Section 15130 of the *State CEQA Guidelines*, cumulative impacts refer to incremental effects of an individual Project when viewed in connection with the effects of past projects, current projects, and probable future projects. Due to the proposed Project's historic disturbance to the development footprint, proximity to development, conservation of the Restoration Area, and mitigation of biological resources, and through compliance with the MSHCP, Project impacts would not result in significant cumulative effects on biological resources.

Project construction would contribute to the incremental loss of Akali Grassland, Disturbed/Developed, Riversidean Sage Scrub, Semi-Natural Herbaceous Grassland, Disturbed Semi-Natural Herbaceous Grassland, Southern Willow Riparian Scrub, and Vernal Pool. Cumulative impacts potentially include habitat fragmentation, increased edge effects, reduced habitat quality, and increased wildlife mortality. Current and future projects within the MSHCP area are required to comply with the MSHCP. The MSHCP provides a comprehensive approach to the regional conservation of these habitats and, as a regional plan, serves to provide mitigation for cumulative impacts to covered species. Project compliance and consistency with the MSHCP ensure that any cumulative impacts to covered species are effectively mitigated. Special-status species that are not covered by the MSHCP also benefit from the surveys, conservation, and other measures of the MSHCP because they occupy many of the same habitats. Additionally, the Project would be required to pay MSHCP Local Development Mitigation Fees. Payment of MSHCP Local Development Mitigation Fees provides habitat-based mitigation within the plan area for all wildlife and plant species impacted due to the loss of suitable habitat from covered projects. The Project is consistent with the goals/objectives of the MSHCP and with the approved DBESP submitted and approved by the Wildlife Agencies on October 2, 2025 (Appendices D-2 and D-3) and the implementation of the proposed avoidance and mitigation measures listed above, including MMs BIO-1 through BIO-11 and RCMs HAZ-1 and WQ-1 through WQ-4. Overall, as outlined in Section 3.4.5, potential impacts on plant communities, sensitive wildlife species, habitat fragmentation, wildlife movement, jurisdictional waters, habitat conservation plans, local ordinances, and regulations protecting biological resources are considered **less than cumulatively significant with mitigation incorporated**.

3.5 CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) discusses the existing cultural resource environments and provides an analysis of potential impacts from implementation of the proposed Project related to cultural resources. Cultural resources are sites, buildings, structures, objects, and districts that may have traditional or cultural value for their historical significance. Examples of cultural resources include precontact (Native American) and historic-period archaeological sites, and historic buildings and bridges of architectural significance. The California Environmental Quality Act (CEQA) requires agencies that are considering projects subject to discretionary action to consider the potential impacts on cultural resources that may occur from project implementation (see Section 15064.5 and Appendix G of the *State CEQA Guidelines*). Section 3.18, Tribal Cultural Resources, of this EIR addresses the topic of tribal cultural resources. Although the contents of this section overlap partially with Section 3.18, this section focuses on cultural resources of Native American and historic-era origin and historic architecture, while Section 3.18 focuses specifically on cultural resources associated with Native American tribes.

This section also summarizes information obtained from a record search at the South Coastal Information Center (SCIC) of the California Historical Resources Information System (CHRIS), a search of the Native American Heritage Commission's (NAHC) Sacred Lands File (SLF), and Native American consultation. In addition, an intensive-level field survey of the entire 140.04-acre Project site (including the Onsite Development Area, Offsite Improvements Area. Restoration Area, and Construction/Improvements Buffer) was conducted to assess the current conditions of the Project site and the previously recorded cultural resources.

This section is based on the *Historical/Archaeological Resources Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California* (Cultural Resources Report),[1] and *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California* (Cultural Resources Addendum).[2] These reports are Appendix E-1 and Appendix E-2, respectively, under confidential cover in this Draft EIR, but are available for review at Lake Elsinore City Hall (130 South Main Street, Lake Elsinore, CA 92530).

Data from the City of Lake Elsinore General Plan, City of Lake Elsinore General Plan EIR, and City of Lake Elsinore Municipal Code are also incorporated into this section.

3.5.1 Scoping Process

Potential impacts to cultural resources were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City of Lake Elsinore (City) received two comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to cultural resources. For copies of the NOP

1 CRM Tech. 2024. *Historical/Archaeological Resources Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California*. January 18. Appendix E-1 (confidential: not for public distribution).

2 CRM Tech. 2025. *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* May 28. Appendix E-2 (confidential: not for public distribution).

comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to cultural resources included comments from the following:

- The California NAHC, July 19, 2024, detailing State procedures for compliance with Assembly Bill (AB) 52, Senate Bill (SB) 18, and other State regulations related to tribal resources and CEQA.

- The Lake Elsinore Historical Society, August 18, 2024, advising that the location of the Project site is the location of the former City of Terra Cotta and its associated clay works plant. Remnants of prior use of the land as a clay mine may include railroad spikes and foundations of former buildings comprising Terra Cotta. The Lake Elsinore Historical Society would be interested in any artifacts associated with Terra Cotta for display at the local museum should they be encountered during Project development.

No questions or issues of concern related to cultural resources were conveyed to the City during the public scoping meeting. As stated previously, a discussion of the Project's potential impact relative to tribal cultural resources, including a summary of required consultation efforts, is included in Section 3.18 of this EIR.

3.5.2 Methodology

To assess the impacts of the proposed Project on cultural resources, a Cultural Resources Report for the Project site was prepared in January 2024 and a Cultural Resources Addendum was prepared to encompass the Offsite Improvements Area in May 2025. These reports included a search of the NAHC's SLF on September 14, 2023, a cultural resource literature and records search on October 2 and 10, 2023, Native American consultation, and an intensive-level field survey of the Project site on November 3, 2023, and December 6, 2023. CRM TECH also prepared a Cultural Resources Addendum that referenced the cultural resource literature and records search and data collected during the intensive-level field survey to encompass the Offsite Improvements Area previously not included in the Cultural Resources Report.

3.5.2.1 Background Research, Field Survey, and Date Review

During the records search conducted on October 2 and 10, 2023, the SCIC's digital maps, records, databases, and existing cultural resources reports within a 1-mile radius of the Project site were examined for previously identified cultural resources. Previously identified cultural resources include properties designated as California Historical Landmarks, Points of Historical Interest, or Riverside County Landmarks, as well as those listed in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or the California Historical Resources Inventory.

On September 14, 2023, a written request to the NAHC was submitted for a records search in the commission's SLF. The NAHC is the State of California's trustee agency for the protection of "tribal cultural resources," as defined by California Public Resources Code (PRC) Section 21074, and is tasked with identifying and cataloging properties of Native American cultural value. On November 9, 2023, the NAHC indicated that the SLF identified unspecified Native American cultural resources in the Project vicinity, although an exact distance to the Project site was not provided, and provided a list of Native American groups to be consulted for further information. The NHAC provided a referral list of 34 individuals associated with 18 local tribes who may have knowledge of such resources.

The local Native American groups as recommended by the NAHC, including the Pechanga Band of Indians (Pechanga), the Soboba Band of Luiseño Indians (Soboba), and Rincon Band of Luiseño Indians (Rincon), were contacted in writing and/or email between September 14, 2023, and December 5, 2023, for further information on potential Native American cultural resources in the Project vicinity and to arrange for tribal participation in the upcoming archaeological field survey. The Soboba Band has not provided any further comments; however, Pechanga indicated in a letter dated November 13, 2023, that the Project site holds a high potential for Native American cultural resources and expressed an interest in participating further in this Project. Pechanga discussed three SLF localities ranging from 0.85 to 1.71 miles in distance from the Project site and indicated the Project site contained a water source and that the native soils below the plow line appeared intact. Based on these factors, Pechanga requested notification once the Project begins the entitlement process, copies of all cultural documentation, government-to-government consultation, and an opportunity to make further recommendations such as tribal monitoring.

Historical background research also included review of published literature in local and regional history, historical maps of the Lake Elsinore area, and aerial/satellite photographs of the Project vicinity. Among the maps consulted were United States General Land Office (GLO) land survey plat maps dated 1880 and USGS topographic maps dated 1901–1997. According to historical sources, the Project vicinity has been the scene of many human activities, primarily mining, agricultural, and transportation-related, since the turn of the 20th century.

3.5.2.2 Field Surveys

The intensive-level field survey was conducted in two phases. On November 3, 2023, the majority of the Project site was surveyed by field archaeologists, accompanied by Native American monitors from Pechanga and Soboba, by walking a series of parallel northeast-southwest transects spaced 15 meters (approximately 50 feet) apart. Ground visibility was generally poor (with 5–10 percent visibility) over the property due to dense vegetation except where past development disturbances, vehicular intrusions, or recent soil testing had cleared the vegetation and/or prevented vegetation growth.

On December 6, 2023, the remainder of the Project site was surveyed by field archaeologists accompanied by Native American monitors from Pechanga and Soboba. This part of the survey was conducted along parallel transects at 5- to 10-meter (approximately 15- to 30-foot) intervals. Visibility of the native ground surface was poor (with 5–10 percent visibility) over most of the acreage due to the presence of dense vegetation as well as pavement along Nichols Road. In light of past ground disturbances on the Project site, the reduced ground visibility was not considered a significant hindrance to the survey efforts given that prior disturbance of the project site has reduced the presence of undisturbed soils at the ground surface.

3.5.2.3 Results

According to the SCIC records search results, at least seven cultural resource surveys completed between 1996 and 2013 covered portions of the Project site, primarily on the northwestern portion of the site. As a result of the previous studies, seven cultural resources were recorded in the Project area. Three of these resources, designated as Site 33-003832, Site 33-015349, and Isolate 33-023880, have been recorded as lying within or partially within the Project site boundaries. As detailed below, Site 33-003832 and Site 33-015349 consist of remnants of historic-period development, while Isolate

33-023880 is of prehistoric (i.e., Native American) origin.[3] The remaining four resources (Site 33-004110, which is a prehistoric artifact scatter, and Sites 33-007175, 33-017027, and 33-017026, which are remnants of historic-period development) are not located within the Project site boundaries. These cultural resources are discussed further below:

- **Site 33-003832:** Originally recorded in 1990, Site 33-003832 comprises the entire route of the now-dismantled Atchison, Topeka, and Santa Fe (ATSF) Railway line through the Temescal Valley between Corona and Lake Elsinore. The ATSF Railway line is approximately 22 miles in total length and includes related features such as remains of power poles and a service road used during the construction and maintenance of the railroad. A segment of the rail line, built in 1896 and removed in the 1970s, once extended along and across the segment of Nichols Road within the Project Offsite Improvements Area. However, the intensive pedestrian survey conducted by CRM TECH during preparation of the Cultural Resources Report concluded this resource no longer exists within the Offsite Improvements Area or within any other portion of the Project site. Furthermore, according to the Cultural Resources Report, the potential historical significance of the site was evaluated in 1995 and 1998, and the site was determined to be ineligible for listing in the NRHP or the CRHR due to the loss of historic integrity through the removal of all integral features of railroad operations, such as the tracks, ties, and signal system.**Site 33-015349**: Recorded in 2006, Site 33-015349 consists of four prospecting trenches dating to the late 19th or early 20th century. The trenches were accompanied by associated soil berms and artifacts, such as railroad spikes and fishplates, and were evidently excavated in search for mineral and/or clay deposits. A small portion of the site has been recorded as overlapping the Project site along the Nichols Road right-of-way (ROW) within the Offsite Improvements Area.However, the intensive pedestrian survey concluded this resource no longer exists within the Offsite Improvements Area or within any other portion of the Project site.

- **Site 33-004110:** Recorded in 1990, Site 33-004110 was documented as a "fairly dense scatter" of groundstone and flaked-stone artifacts along Collier Avenue, then a narrow dirt road lying slightly to the north of its current alignment at that location. The location of the site has been developed, and the site presumably no longer exists. The site location is not part of the proposed Project.

- **Site 33-007175:** Recorded in 1981, Site 33-007175 was documented as a historic-period building in close proximity to Collier Avenue. The proposed Project activities along Collier Avenue are confined to infrastructure improvements entirely within the public ROW, and this site location is not part of the Project.

- **Site 33-017027:** Recorded in 2007, Site 33-017027 represents the same locality as Site 33-007175. The proposed Project activities along Collier Avenue are confined to infrastructure improvements entirely within the public ROW, and the site location is not part of the proposed Project.

- **Site 33-017026:** Recorded in 2007 in conjunction with Site 33-017027, Site 33-017026 was documented as structural foundations representing locations of former buildings. The proposed

[3] An isolate refers to a locality with fewer than three artifacts.

Project activities along Collier Avenue are confined to infrastructure improvements entirely within the public ROW, and this site location is not part of the proposed Project.

- **Isolate 33-023880:** Recorded in 2013, Isolate 33-023880, represents the location of a single lithic flake found in a trench along Pierce Street, in the northeast portion of the Project site, within the Offsite Improvements Area. The flake was analyzed, recorded on California Department of Parks and Recreation (DPR) forms, and reburied in the trench following recordation. There is no potential for further impact to this resource due to it being an isolated artifact previously recorded on DPR forms.

In addition, the SCIC records search identified one historic-period site (Site 33-017022) that was recorded on the opposite (northeast) side of Baker Street from the Onsite Development Area that consists of structural foundations, landscaping, and a driveway associated with a residence constructed around 1950. Also, a historic site exists to the north of Nichols Road, adjacent to the Offsite Improvements Area (recorded under the temporary designation of 3792-5H, pending assignment of a permanent number in CHRIS by the SCIC), which consists of the remains of a coal and clay mining facility that operated from circa 1887 to the 1970s.

The SCIC records search also identified 40 previous studies conducted between 1978 and 2018 identifying 42 additional historical/archaeological sites and isolates within 1 mile of the Project site. Eight of these sites and eight of the isolates were prehistoric in nature, consisting predominantly of scattered artifacts, especially lithic tools and flakes and groundstone pieces, such as metates and manos. The other 26 resources dated to the historic period and included structural remains, refuse scatters, buildings, a mining site, and a single isolate consisting of a sun-colored amethyst glass bottle collar. The majority of the historic-period sites are buildings constructed between circa 1900 and 1959. None of the additional sites or isolates are located adjacent to the Project site.

Results of the Field Survey. The field survey found no cultural resources at or near the locations of Site 33-015349 and Isolate 33-023880. At Site 33-003832, the abandoned railroad grade still remains outside the Project site boundary; however, the portions that crossed into the Project site no longer exist. Similarly, in the areas near the two previously recorded sites lying outside but adjacent to the Project Offsite Improvement Areas (Sites 33-017022 and 3792-5H), no features or artifacts of historical origin were found. Concrete foundations left by demolished residences were noted on the Project site along Baker Street; however, none of these residences are known to predate the 1970s and do not constitute a unique cultural or historical site or artifact.

The only notable feature of historical origin identified is Nichols Road, which dates to sometime between 1939 and 1951. However, like numerous other roadways of historical origin that remain in use today, Nichols Road has clearly undergone repeated upgrading and maintenance in the modern era. As a working component of the modern transportation infrastructure, this two-lane road with hard shoulders does not demonstrate any distinctively historical character or any special merits in design, construction, engineering, or aesthetics. Therefore, the survey determined it retains little potential for historic significance.

3.5.3 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within Riverside County, Lake Elsinore, and the Project site as it relates to cultural resources.

3.5.3.1 Project Site Description

The Project site is irregular in shape and generally bound by undeveloped land in all directions. The Project site includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a residence are outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and public uses are located outside the Project site limits. The Project site has a history of limited agriculture use; however, no agricultural uses currently exist on site. Elevations within the Project site range approximately between 1,260 feet and 1,400 feet above mean sea level, inclining gradually to the north and the southwest, with the lowest elevations in the central portion.

The Geotechnical Evaluation[4] (Appendix G-1) prepared for the proposed Project found that the primary bedrock unit underlying the Project site is the Tertiary Silverado Formation. Surficial units consisting of undocumented artificial fill, topsoil, colluvium, and alluvium overlie the bedrock.

3.5.3.2 Prehistoric Context

The earliest evidence of human occupation in western Riverside County was discovered below the surface of an alluvial fan in the northern portion of the Lakeview Mountains, overlooking the San Jacinto Valley, with radiocarbon dates clustering around 9,500 before present (B.P.) Another site found near the shoreline of Lake Elsinore, close to the confluence of Temescal Wash and the San Jacinto River, yielded radiocarbon dates between 8,000 and 9,000 B.P. Additional sites with isolated Archaic dart points, bifaces, and other associated lithic artifacts from the same age range have been found in the Cajon Pass area of San Bernardino County, located more than 30 miles north of the Project site, typically atop knolls with good viewsheds.

The cultural history of Southern California has been summarized into numerous chronologies. Although the beginning and ending dates of different cultural horizons vary regionally, the general framework of the prehistory of western Riverside County can be broken into three primary periods:

- **Paleoindian Period (18,000–9,000 B.P.):** Native peoples of this period created fluted spearhead bases designed to be hafted to wooden shafts. Other artifacts associated with the Paleoindian

[4] LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. January 31. Appendix G-1.

toolkit include choppers, cutting tools, retouched flakes, and perforators. Sites from this period are very sparse across the landscape, and most are deeply buried.

- **Archaic Period (9,000–1,500 B.P.):** Archaic sites are characterized by abundant lithic scatters of considerable size with many biface thinning flakes, bifacial preforms broken during manufacture, and well-made groundstone bowls and basin metates. As a consequence of making dart points, many biface thinning waste flakes were generated at individual production stations, which is a diagnostic feature of Archaic sites.

- **Late Prehistoric Period (1,500 B.P.–contact):** Sites from this period typically contain small lithic scatters from the manufacture of small arrow points, expedient groundstone tools such as tabular metates and unshaped manos, wooden mortars with stone pestles, acorn or mesquite bean granaries, ceramic vessels, shell beads suggestive of extensive trading networks, and implements such as pipes and arrow shaft straighteners.

3.5.3.3 Ethnohistoric Context

The Lake Elsinore area has long been a part of the traditional territory of the Luiseño, a Takic-speaking people whose territory extended from present-day Riverside to Escondido and Oceanside, with the nearby Temecula Valley at its geographical center. According to most accounts, the area belonged to the Late Prehistoric San Luis Rey Complex, which has been equated with the Luiseño. The San Luis Rey Complex has been divided into the San Luis Rey I and San Luis Rey II subperiods, which date to 1400–1750 and 1750–1850 A.D., respectively, overlapping the Protohistoric and early Historic periods.

The name Luiseño was derived from Mission San Luis Rey, which held jurisdiction over most of the Luiseño territory during the Mission Period. Prior to European contact, the Luiseño may have been known as Puyumkowitchum, or “Western people.” Luiseño history, as recorded in traditional songs, tells the creation story from the birth of the first people, the Kaamalam, to the sickness, death, and cremation of Wiyoot, the most powerful and wise one, at Lake Elsinore. The Luiseño society was based on autonomous lineages or kin groups, which represented the basic political unit among most Southern California Indians. Each Luiseño lineage possessed a permanent base camp, or village, on the valley floor and another in the mountain regions for acorn collection. Luiseño villages were made up of family members and relatives, usually located in sheltered canyons or near year-round sources of water, always in proximity to subsistence resources.

As the landscape defined their subsistence practices, the tending and cultivation practices of the Luiseño helped shape the landscape. The practice of controlled burning of chaparral and oak woodland areas created an open countryside with more accessible foraging material for animals, which in turn led to more successful hunting. It also increased the ease with which plant foods could be gathered and prevented out-of-control wildfires by eliminating dead undergrowth before it accumulated to dangerous levels. Coppicing, or trimming plants to the ground, resulted in straighter growth for basketry and arrow-making materials. Granitic outcroppings were used for pounding and grinding nuts and seeds, which left their mark in the resulting bedrock milling features, the most common archaeological remains found in the region.

It is estimated that when Spanish colonization of Alta California began in 1769, the Luiseño had approximately 50 active villages with an average population of 200 each, although other estimates place the total Luiseño population at 4,000-5,000. Some of the villages were forcefully moved to the Spanish missions, while others were largely left intact.

After the American annexation of Alta California, the large number of non-Native settlers further eroded the foundation of traditional Luiseño society. During the latter half of the 19th century, almost all of the remaining Luiseño villages were displaced, their occupants eventually removed to the various reservations, including the Soboba, Pechanga, and Pala Band of Mission Indians (Pala).

3.5.3.4 Historic Context

After the beginning of Spanish colonization of Alta California, what is today the southwestern portion of Riverside County, consisting of the Temescal, Elsinore, and Temecula valleys, became the first region in the county to be settled. Beginning in 1834, during secularization of the mission system, former mission ranchos throughout Alta California were surrendered to the Mexican government and subsequently divided and granted to various prominent citizens in the province. The Project site lies mostly within the boundaries of the Rancho La Laguna, which was originally granted to Julian Manriquez in 1844 but is best remembered today in association with its second and third owners, Abel Stearns and the Augustin Machado family, who held the 13,338.8-acre rancho between 1852 and 1873. As elsewhere in Alta California, cattle raising was the most prevalent economic activity on this and other nearby ranchos, until the influx of American settlers eventually brought an end to this lifestyle in the second half of the 19th century.

In 1883, Franklin H. Heald, Donald M. Graham, and William Collier purchased 12,832 acres of Rancho La Laguna land, on which they laid out the townsite of Elsinore. Three years later, the town's founders began advertising the healing properties of "medicine water" from the abundant hot sulfur springs in the area. With bath houses and related businesses springing up in and around the new colony, Elsinore soon became known as a resort town, a reputation that fueled the growth of the community for much of the 20th century.

The town was incorporated in 1888, in what was then San Diego County. By the mid-20th century, due to changing trends in the American lifestyle, the mineral bath industry gradually went into decline, and the lake went completely dry for years during the 1950s. The City voted to change its name from Elsinore to Lake Elsinore in 1972 to better promote its recreational facilities. Since the early 1980s, the City of Lake Elsinore has experienced rapid growth in residential development and, like many other communities in southwestern Riverside County, has begun to take on more and more the characteristics of a "bedroom community" in support of the fast-growing industries in nearby Orange County and the Temecula area of Riverside County. As of July 1, 2023, the City had grown to cover 38.3 square miles with a population of over 73,028.[5]

[5] United States Census Bureau. 2023. Quick Facts, Lake Elsinore City, California. July 1. Website: https://www.census.gov/quickfacts/fact/dashboard/lakeelsinorecitycalifornia/PST045222 (accessed July 11, 2024).

3.5.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.5.4.1 Federal Policies and Regulations

The National Historic Preservation Act of 1966 (NHPA). The NHPA requires that the federal government list significant historic resources on the NRHP. Federal agencies must consult the NRHP when planning to undertake or grant approval through permits for a project. Prior to the issuance of any license or implementation of any project, the federal agency must consider the effects of a project or license on any historical buildings, sites, structures, or objects that are included on, or eligible for inclusion on, the NRHP (54 United States Code [USC] Sections 300101, 307108). This typically includes consultation with the federal agency responsible for the undertaking; the State Historic Preservation Officer (SHPO); local Native American groups and individuals; local and State historical societies and organizations; and relevant archival sources, including the appropriate facility of the CHRIS.

The following criteria are designed to guide the states, federal agencies, and the Secretary of the Interior in evaluating potential entries for the NRHP:[6]

> The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:
>
> A. That are associated with events that have made significant contribution to the broad patterns of our history; or
>
> B. That are associated with the lives of persons significant in our past; or
>
> C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
>
> D. That have yielded, or may be likely to yield, information important in prehistory or history.

Archaeological Resources Protection Act (ARPA). The Archaeological Resources Protection Act (16 USC 470, et seq.) was enacted in 1979 with the purpose of securing the protection of archaeological resources and sites on public lands and Native American lands, and to foster increased cooperation and exchange of information among governmental authorities, the professional archaeological community, and private individuals.

The Native American Graves Protection and Repatriation Act (NAGPRA). The NAGPRA (25 USC Sections 3001–3013) describes the rights of Native American lineal descendants, Indian tribes, and

[6] National Park Service (NPS). 1995. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation.* Website: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf (accessed August 14, 2025).

Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. It requires that federal agencies and museums receiving federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items.[7]

3.5.4.2 State Policies and Regulations

California Environmental Quality Act Requirements. CEQA defines a "historical resource" as a resource that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the CRHR; (2) listed in a local register of historical resources as defined in PRC Section 5020.1(k); (3) identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); or (4) determined to be a historical resource by a project's Lead Agency (PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5(a)). A historical resource consists of:

> "Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California…. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing on the California Register of Historical Resources" (*State CEQA Guidelines* Section 15064.5(a)(3)).

In accordance with *State CEQA Guidelines* Section 15064.5(b), a substantial adverse change in the significance of a historical resource is considered a significant effect on the environment. This type of change means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." (14 CCR Section 15064.5(b))

CEQA requires a Lead Agency to determine whether an archaeological cultural resource meets the definition of a historical resource, a unique archaeological resource, or neither (*State CEQA Guidelines* Section 15064.5(c)). Prior to considering potential impacts, the Lead Agency must determine whether an archaeological cultural resource meets the definition of a historical resource in *State CEQA Guidelines* Section 15064.5(c)(1). If the archaeological cultural resource meets the definition of a historical resource, it is treated like any other type of historical resource in accordance with *State CEQA Guidelines* Section 15126.4. If the archaeological cultural resource does not meet the definition of a historical resource, then the Lead Agency determines whether it meets the definition of a unique archaeological resource as defined in PRC Section 21083.2(g). Should the archaeological cultural resource meet the definition of a unique archaeological resource, it must be treated in accordance with PRC Section 21083.2. If the archaeological cultural resource does not meet the definition of a historical resource or an archaeological resource, the effects to the resource are not considered significant effects on the environment (*State CEQA Guidelines* Section 15064.5(c)(4)).

[7] National Park Service (NPS). *The Native American Graves Protection and Repatriation Act (NAGPRA).* Website: https://www.nps.gov/subjects/nagpra/index.htm (accessed July 26, 2024).

California Public Resources Code. The PRC protects archaeological, paleontological, and historical sites or public lands and recognizes cultural and paleontological resources as nonrenewable, therefore granting them protection under the PRC. Specifically, PRC Section 5097.5 provides for the protection of cultural resources and prohibits the removal, destruction, injury, or defacement of archaeological features on any public lands.

California Health and Safety Code (HSC) Section 7050.5. California HSC Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether the remains are subject to the coroner's authority. If the human remains are of Native American origin, the County Coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

California Register of Historical Resources (PRC Section 5020 et seq.). State law also protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources in CEQA documents. A cultural resource is an important historical resource if it meets any of the criteria found in *State CEQA Guidelines* Section 15064.5(a). These criteria are nearly identical to those for the NRHP, which are listed above.

The SHPO maintains the CRHR. Properties listed, or formally designated eligible for listing, on the NRHP are nominated to the CRHR and then selected to be listed on the CRHR, as are State Landmarks and Points of Interest.

The CRHR criteria are based on NRHP criteria. For a property to be eligible for inclusion in the CRHR and, therefore, an important historical resource, one or more of the following criteria must be met:[8]

1. **Event.** It is associated with the events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2. **Person.** It is associated with the lives of persons important to local, California, or national history;

3. **Design or Construction.** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values; and/or

4. **Informational Potential.** It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

In addition to meeting one or more of the above criteria, the CRHR requires that sufficient time has passed since a resource's period of significance to "obtain a scholarly perspective on the events or

[8] California Office of Historic Preservation. California Register of Historical Resources. Website: https://ohp.parks.ca.gov/?page_id=21238 (accessed August 14, 2025).

individuals associated with the resource." Fifty years is used as a general estimate of time needed to develop the perspective to understand the resource's significance (California Code of Regulations [CCR] Section 4852[d][2]).

The CRHR also requires that a resource possess integrity, which is defined as "the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance."[9] To retain integrity, a resource should have its original location, design, setting, materials, workmanship, feeling, and association. Which of these factors is most important depends on the particular criterion under which the resource is considered eligible for listing.[10]

Assembly Bill 52. Signed into law in September 2014, California AB 52 created a new class of resources—tribal cultural resources—for consideration under CEQA. Tribal cultural resources may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe that are listed or determined to be eligible for listing in the CRHR, included in a local register of historical resources, or a resource determined by the lead CEQA agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing in the CRHR. AB 52 requires that the lead CEQA agency consult with California Native American tribes that have requested consultation for projects that may affect tribal cultural resources. The lead CEQA agency shall begin consultation with participating Native American tribes prior to the release of a Negative Declaration, Mitigated Negative Declaration, or EIR. Under AB 52, a project that has potential to cause a substantial adverse change to a tribal cultural resource constitutes a significant effect on the environment unless mitigation reduces such effects to a less than significant level.

For further information regarding tribal consultation, refer to Section 3.18, Tribal Cultural Resources.

3.5.4.3 Regional Policies and Regulations

There are no regional policies or regulations applicable to cultural resources that are relevant to the proposed Project.

3.5.4.4 Local Policies and Regulations

City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. Chapter 4.0 of the City of Lake Elsinore General Plan describes cultural resources within the city. The following goals and policies apply to the proposed Project:

- **Goal 6:** Preserve, protect, and promote the cultural heritage of the City and surrounding region for the education and enjoyment of all City residents and visitors, as well as for the advancement of historical and archeological knowledge.

[9] California Office of Historic Preservation. 2011. *Technical Assistance Series #6 California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register).* Website: https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf (accessed July 26, 2024).

[10] Ibid.

- **Policy 6.1:** Encourage the preservation of significant archeological, historical, and other cultural resources located within the City.

- **Policy 6.3:** When significant cultural/archeological sites or artifacts are discovered on a site, coordination with professional archeologists, relevant state and, if applicable, federal agencies, and the appropriate Native American tribes regarding preservation of sites or professional retrieval and preservation of artifacts or by other means of protection, prior to development of the site shall be required. Because ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices, developers shall waive any and all claims to ownership and agree to return all Native American ceremonial items and items of cultural patrimony that may be found on a project site to the appropriate tribe for treatment. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.

- **Policy 6.4:** If archeological excavations are recommended on a project site, the City shall require that all such investigations include Native American consultation, which shall occur prior to project approval.

- **Goal 7:** Support state-of-the-art research designs and analytical approaches to archeological and cultural resource investigations while also acknowledging the traditional knowledge and experience of the Native American tribes regarding Native American culture.

  - **Policy 7.2:** Continue to identify, document, evaluate, designate, and preserve the cultural resources in the City.

  - **Policy 7.4:** Support the permanent curation of archaeological artifact collections by universities or museums or appropriate tribal facilities.

- **Goal 10:** Encourage the preservation, protection, and restoration of historical and cultural resources.

3.5.5 Thresholds of Significance

The thresholds for cultural resources impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines*. The proposed Project may be deemed to have a significant impact with respect to cultural resources if it would:

Threshold 3.5.1: Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5,

Threshold 3.5.2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5, or

Threshold 3.5.3: Disturb any human remains, including those interred outside of dedicated cemeteries.

3.5.4 Project Impacts

Threshold 3.5.1: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. As discussed above in Regulatory Setting, Historical resources are defined as any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California.

The SCIC records search identified seven potential cultural or historical resources as lying within or partially within the Project site boundaries, including within the Offsite Improvements Area. These include an isolate of prehistoric (i.e., Native American) origin and two archaeological sites from the historic period. These resources have been designated as Site 33-003832, Site 33-015349, and Isolate 33-023880 and are described further in Section 3.5.2.3, above. A field survey was performed as part of the Cultural Resources Report, as also described above in Section 3.5.2. The study found Site 33-003832 and Site 33-015349 no longer exist within the Offsite Improvements Area or within any other portion of the Project site. Isolate 33-023880 remains buried along the Pierce Street ROW, and no additional cultural resources were observed at or near the locations of Site 33-015349 and Isolate 33-023880. At Site 33-003832, the abandoned railroad grade still survives outside the Project site boundary; however, the portions that crossed into the Project site no longer exist. Similarly, in the areas near the two previously recorded sites lying outside but adjacent to the Project Offsite Improvements Area (Sites 33-017022 and 3792-5H), no features or artifacts of historical origin were found within the Project site boundaries. Concrete foundations left by demolished residences were noted on the Project site along Baker Street; however, none of these residences are known to predate the 1970s. Therefore, they would not be considered historical resources under CEQA.

Site 33-004110 was documented as a “fairly dense scatter” of groundstone and flaked-stone artifacts along Collier Avenue, then a narrow dirt road lying slightly to the north of its current alignment at that location. The location is now occupied by the Park N Ride parking lot at the Lake Elsinore Outlet Center that is not part of the Project, and the site presumably no longer exists. Also, Site 33-007175, Site 33-017027, and Site 33-017026 are outside of the proposed Project activities along Collier Avenue, which are confined entirely within the public ROW. Hence, the Project would have no potential to substantially alter the conditions of these resources.

The only notable feature of any historical origin identified within the Project site (Offsite Improvements Area) was Nichols Road, whose origin dates to sometime between 1939 and 1951. However, as a working component of the modern transportation infrastructure, this two-lane road with hard shoulders does not demonstrate any distinctively historical character or any special merits in design, construction, engineering, or aesthetics. Therefore, it retains little to no potential for historic significance.

Based on the results of the records search, additional research, and field survey, the Project site, including the Offsite Improvements Area does not contain any “historical resources” as defined under *CEQA Guidelines* Section 15064.5. As indicated above, all cultural resources lack the required integrity and significance to be listed as historical resources under CEQA. In addition, because the entire Project

site has sustained disturbance from past use of the site and absence of historical resources identified from the field survey and research sensitivity for in-situ undocumented subsurface historical resources is low. Therefore, given this low sensitivity and lack of historical resources as defined by CEQA, no impact to historical resources would occur with implementation of the proposed Project.

Threshold 3.5.2: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant with Mitigation Incorporated. As discussed under Threshold 3.5.1, above, the records search, additional research, and field survey conducted as part of the Cultural Resources Report prepared for the proposed Project did not identify any cultural or historical resources, including archeological resources as defined under *CEQA Guidelines* Section 15064.5 on the Project site. Site 33-003832, Site 33-015349, and Isolate 33-023880 described in detail in Section 3.5.2.3 were investigated during the Project-specific field survey, which indicated Site 33-003832 and Site 33-015349 no longer exist within the Offsite Improvements Area or within any other portion of the Project site, Isolate 33-023880 remains buried along the Pierce Street ROW and would not be disturbed by the proposed Project, and no additional cultural resources were observed at or near the locations of Site 33-015349 and Isolate 33-023880. At Site 33-003832, the abandoned railroad grade still survives outside the Project site boundary; however, no tracks, materials, or other infrastructure remain, and the portions that crossed into the Project site no longer exist.

Site 33-004110 was previously documented as a "fairly dense scatter" of groundstone and flaked-stone artifacts along Collier Avenue, which was then only a narrow dirt road lying slightly to the north of its current alignment at that location. The location is not located within the Project site and is now occupied by the Park N Ride parking lot at the Lake Elsinore Outlet Center, and the site presumably no longer exists or, if it does exist, lies beneath the paved Park N Ride. Furthermore, Site 33-007175, Site 33-017027, and Site 33-017026 are not within the Project site. The proposed Project activities along Collier Avenue are confined entirely within the public ROW and would have no potential to alter the conditions of these resources. Furthermore, the proposed Project must comply with all applicable regulations protecting archaeological resources, including CCR Title 14, Section 15064.5, and PRC Section 21083.2, California Environmental Quality Act-Archeological Resources, which enable the City to require the Project Applicant to make reasonable effort to preserve or mitigate significant impacts by the proposed Project to any affected significant or unique archaeological resource.

Although there are no known archaeological resources on the Project site, due to the presence of identified cultural resources in the surrounding area, there is potential for currently unknown subsurface archaeological resources (both historic-era resources, as well as precontact [Native American] resources) to be present at the Project site. As such, construction and ground-disturbing activities associated with the proposed Project could reveal previously unknown subsurface archaeological resources. Accordingly, the proposed Project would be required to comply with **Mitigation Measures (MMs) CUL-1** through **CUL-7** to ensure that archaeological resources are protected if potential archaeological resources are encountered during Project construction. With implementation of **MMs CUL-1** though **CUL-7**, potential impacts associated with a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5 would be **less than significant**.

Threshold 3.5.3: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant. As previously discussed, the Cultural Resources Assessment determined that the potential for encountering subsurface cultural resources during construction is low. Therefore, there would also be a low potential for the proposed project to disturb human remains. Nevertheless, the proposed project must comply with all applicable regulations protecting human remains, should they be encountered, including Section 7050.5 of the California HSC, which requires that excavation be stopped in the vicinity of the discovered human remains while the coroner determines whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Project Applicant shall comply with the HSC relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). Additionally, Section 8100 of the HSC states that six or more human burials at one location constitutes a cemetery, and Section 7052 of the HSC indicates that disturbance of Native American cemeteries is a felony.

Accordingly, the proposed Project would be required to comply with existing regulations to ensure that human remains (or remains that may be human), including Native American human remains, would be protected if they are discovered during Project construction. With adherence to existing regulations any human remains uncovered during construction would be protected, and impacts would be less than significant.

3.5.6 Level of Significance Prior to Mitigation

Prior to mitigation, no impacts to historic resources would occur and less than significant impacts to human remains would occur. Potentially significant impacts to unidentified archaeological resources (both historic-era resources, as well as prehistoric [Native American] resources), have the potential to occur during ground-disturbing activities prior to mitigation.

3.5.7 Compliance Measures and Mitigation Measures

3.5.7.1 Compliance Measures

The following Regulatory Compliance Measure (RCM) is applicable to the proposed Project.

- Section 7050.5 of the California HSC and PRC 5097.5

3.5.7.2 Mitigation Measures

To comply with CEQA, the following mitigation measures are applicable to the proposed Project.

MM CUL- 1: **Unanticipated Resources.** The Project grading permit shall state that the developer/permit holder or any successor in interest shall comply with the following for the life of the permit. If, during ground-disturbing activities, unanticipated cultural resources are discovered, the following procedures shall be followed:

1. All ground-disturbing activities within 100 feet of the discovered cultural resource shall be halted until a meeting is convened among the

developer, the Project Archaeologist (as defined in MM CUL-2), the Native American tribal representative(s) from the consulting tribes (Pechanga Band of Indians [Pechanga] and Soboba Band of Luiseño Indians [Soboba], if the resource is determined to be Native American in origin), and the Community Development Director, or designee, to discuss the significance of the find (referred to hereafter as the "aforementioned parties").

2. The developer shall call the Community Development Director, or 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 made, with the concurrence of the Community Development Director, or designee, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the uncovered cultural resource.

4. Further ground disturbance shall not resume within the area of the find until a meeting has been convened with the aforementioned parties and a decision made, with the concurrence of the Community Development Director or their designee, as to the appropriate mitigation measure(s) for the uncovered cultural resource.

5. Treatment and avoidance of the newly discovered resources shall be consistent with the Tribal Monitoring Agreement entered into with Pechanga and Soboba. This may include avoidance of cultural resources through Project design, in-place preservation of cultural resources located in native soils, and/or reburial on the Project property so they are not subject to further disturbance in perpetuity as identified in a Non-Disclosure of Reburial Location measure.

6. Pursuant to California Public Resources Code (PRC) § 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the find is determined to be significant (as determined through concurrence of the aforementioned parties) and avoidance of the find cannot be achieved, a Phase III data recovery plan (an in-depth excavation and data collection and reporting process) shall be prepared by the Project Archeologist, in consultation with the consulting tribe(s) if the resource is determined to be Native American in origin, and shall be submitted to the City for review and approval prior to implementation of the said plan.

7. Pursuant to PRC § 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 (CEQA) with respect to archaeological resources and the recommendations of the Project Archeologist, and shall take into account the cultural and religious principles and practices of the Consulting Tribe(s) and the Constitutional rights of the landowner and/or applicant. 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 Phase III data recovery plan and a final report detailing the significance and data recovery finding.

MM CUL-2: **Archaeologist/Cultural Resource Monitoring Program.** Prior to issuance of grading permits, the Project Applicant/developer/permit holder shall provide evidence to the Community Development Department that a Secretary of Interior Standards qualified and certified Registered Professional Archaeologist (RPA) (Project Archaeologist) 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 to avoid the potential for impacts to unanticipated cultural resources. These measures shall include, but shall not be limited to, the following:

- **Archaeological Monitor:** Methodology to determine the adequate number of qualified monitors that shall be present to ensure that all earthmoving activities of previously undisturbed soils are observed and shall be on site during all grading activities of 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 Pechanga and Soboba 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 CRMP; 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 aforementioned parties and the Project Archaeologist, in consultation with the Tribal Monitor(s) (as applicable for a tribal resource), shall determine the significance of the discovered resources. The Community Development Director, or 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, based on the significance of the find.

- **Phase IV Report:** A final archaeological report shall be prepared by the Project Archaeologist and submitted to the Community Development Director, or designee, prior to final construction. 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 Department of Parks and Recreation forms for all sites affected by the development; final disposition of the resources, including GPS data; and an artifact catalog and any additional recommendations. A final copy shall be submitted to the City, Project Applicant/developer, the South Coastal Information Center (SCIC), and the Consulting Tribe.

MM CUL-3: **Cultural Resources Disposition.** The Project grading permit shall state that in the event 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 developer/landowner and Consulting Tribe. 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 or 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, if feasible, 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.

   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 (included in MM CUL-2). The Phase IV Report shall be filed with the City under a confidential cover and not subject to Public Records Request.

3. If preservation in place or reburial are not feasible, the resources shall be curated in the culturally sensitive matter at a Riverside County curation facility that meets the requirements of the 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 the title. Evidence of curation in the form of a letter from the curation facility stating that the subject archaeological materials have been received shall be provided by the landowner to the City of Lake Elsinore. 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 (included in MM CUL-2). Evidence of compliance with this mitigation measure, if a significant archaeological resource is found, shall be provided to the City upon completion of a treatment plan and final report detailing the significance and treatment of the find.

MM 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), Pechanga and Soboba, that have requested monitoring through consultation with the City during the Assembly Bill (AB) 52 and/or the Senate Bill (SB) 18 process ("Monitoring Tribe(s)"). The Applicant shall coordinate with the tribe(s) to develop an individual Tribal Monitoring Agreement. A copy of the signed agreement 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, 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 the treatment and final disposition of any cultural resources, sacred sites, and human remains/burial goods discovered on the site per the tribes' (Pechanga and Soboba) customs and traditions and the City's mitigation measures/conditions of approval. The Tribal Monitor will have the authority to stop and redirect grading within 100 feet (i.e., the "buffer area") of a find only for so long as is reasonably necessary to evaluate the find and determine the appropriate next steps, in consultation with the Project Archaeologist. Grading will be allowed to continue outside the buffer area.

MM CUL-5: **Phase IV Report.** Upon completion of the tribal monitoring, a Phase IV Cultural Resources Monitoring Report shall be submitted that complies with the Riverside County Planning Department's requirements for such reports for ground-disturbing activities associated with this Project's grading. 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 the 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 copies shall be submitted to the SCIC, and one copy shall be submitted to the Monitoring Tribe.

MM 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 earthmoving activities within 100 feet of the find. The Project Applicant/developer 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 PRC Section 5097.98.

MM 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 shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.

3.5.8 Level of Significance after Mitigation

Implementation of **MMs CUL-1** though **CUL-7** would ensure the Project would include Native American and professional archaeological monitoring during ground-disturbing activities as a result of Project-related construction to identify and evaluate any cultural, tribal cultural, or archaeological resources that may be encountered. Excavation and/or construction activities would cease if cultural, tribal cultural, archaeological resources, or human remains are identified, and they would be evaluated by the Archaeological Monitor and Tribal Monitor/Consultant. With implementation of **MMs CUL-1** through **CUL-7**, potential significant impacts to cultural resources would be reduced to a **less than significant level**.

3.5.9 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for cultural resources. The cumulative impact area for cultural resources is the city of Lake Elsinore and the greater Elsinore Valley region. As discussed above, there are no known potentially significant cultural resources (including archaeological resources and human remains) within the Project site. In addition, implementation of **MMs CUL-1** through **CUL-7** would ensure that potential impacts to cultural resources, including any human remains and/or unanticipated resources discovered during the Project, would be less than significant. These measures would also reduce the potential of the proposed Project to contribute to a cumulatively considerable impact on cultural resources to a less than significant level.

Each discretionary development proposal received by the City is required to comply with the requirements of CEQA, including an environmental review as applicable to determine if a project would have a substantial adverse change in the significance of a cultural resource. The mitigation measures and existing regulations would also lessen any potentially significant cumulative impacts to archaeological resources by ensuring that proper oversight is provided in the event that any cultural or historical resource is uncovered during construction, and to ensure that adverse impacts to any cultural resources are reduced to less than significant levels. Therefore, when considered in conjunction with past, present, and probable future projects, Project impacts pertaining to cultural resources, including human remains, would be **less than cumulatively considerable with inclusion of MMs CUL-1** though **CUL-7.**

3.6 ENERGY

This section describes energy use resulting from implementation of the proposed Baker Street Warehouse Project (proposed Project) and evaluates whether the proposed Project would result in the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with any applicable plans for renewable energy and energy efficiency. The analysis in this section is based on the findings of the *Baker Lake Elsinore Air Quality Impact Analysis*[1] and *Baker Lake Elsinore Energy Tables*[2] prepared for the proposed Project (Appendices C-1 and F, respectively).

3.6.1 Scoping Process

Potential impacts to energy were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City of Lake Elsinore (City) received one comment letter in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, that included concerns about the proposed Project's potential impacts related to energy. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft Environmental Impact Report (EIR). NOP comments related to energy included comments from the following:

- South Coast Air Quality Management District (Sam Wang), July 19, 2024, recommended that the Draft EIR include an adequate analysis regarding energy and recommended the Draft EIR consider including provided mitigation measures to reduce demand for energy.

For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.6.2 Methodology

This analysis focuses on the four sources of energy that are relevant to the proposed Project: electricity, natural gas, the equipment fuel necessary for Project construction, and the vehicle and truck fuel necessary for Project operations. For the purposes of this analysis, the amount of electricity, natural gas, construction fuel, and fuel use from operations are quantified and compared to that consumed in Riverside County. The electricity/natural gas use of the proposed Project is analyzed as a whole on an annual basis and compared to the existing annual energy consumption in Riverside County.

The analysis of electricity usage is based on the California Emissions Estimator Model (CalEEMod) included in Appendix C-1, which quantifies energy use for Project operations. The proposed Project would be all-electric and would not require the use of natural gas except for use of the on-site cargo handling equipment within the Onsite Development Area. CalEEMod quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as greenhouse gas (GHG) emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. CalEEMod utilizes widely accepted methodologies for estimating emissions combined with default data that can be used when site-specific information is not available, including data from the California Energy Commission (CEC). CalEEMod contains default values for estimating utility consumption (e.g., water, electricity, natural gas) that may be used in the preparation of energy

[1] Urban Crossroads. 2025. *Baker Lake Elsinore Air Quality Impact Analysis*. June 3.
[2] Urban Crossroads. 2025. *Baker Lake Elsinore Energy Tables*. June 3.

analyses. Additionally, it should also be noted that the energy use factors included in CalEEMod, which were used to estimate energy for the proposed Project, are based on the CEC-sponsored California Commercial End Use Survey (CEUS) and Residential Appliance Saturation Survey (RASS) studies, which provide a more conservative estimation based on actual use surveys and are the best available criteria for purposes of this assessment. As such, CalEEMod is appropriate for use in energy analyses. Use of the on-site cargo handling equipment was calculated using California Air Resources Board (CARB) Emission FACtors (EMFAC) offroad emission factors.

Fuel consumption (diesel fuel and gasoline) from vehicle trips during operation was estimated based on the *Scoping Agreement for Traffic Impact Study*[3] in conjunction with CARB EMFAC fuel efficiency data.

3.6.3 Existing Environmental Setting

This section describes existing energy providers within Lake Elsinore and within the jurisdiction of the Project site.

3.6.3.1 Electricity

Electricity is a manmade resource. The production of electricity requires the consumption or conversion of energy resources (including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources) into energy. Electricity is used for a variety of purposes, including lighting, heating, cooling, and refrigeration, as well as operating appliances, computers, electronics, machinery, and public transportation systems.[4]

According to the most recent data available, in 2023, California's electricity was generated primarily by natural gas (43.68 percent), non-GHG and renewable sources (56.09 percent), large hydroelectric (12.55 percent), nuclear (8.22 percent), coal (0.12 percent), and other unspecified sources. Total electric generation in California in 2023 was 281,140 gigawatt-hours (GWh), down 2.1 percent from the 2022 total generation of 287,220 GWh.[5]

Under existing conditions, the Project site is vacant; therefore, there is currently no electricity consumed within the Project site. Electricity at the Project site would be provided by Southern California Edison (SCE). According to the CEC, total electricity consumption in the SCE service area in 2022 was 85,870 GWh, or 85,869,985,679 kilowatt-hours (kWh).[6] Of this total, Riverside County consumed 17,780 GWh, or 17,780,573,271 kWh.[7]

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3 EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

4 United States Energy Information Administration (EIA). 2024a. Electricity Explained. Website: https://www.eia.gov/energyexplained/electricity/ (accessed June 2025).

5 California Energy Commission (CEC). 2024b. 2023 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation (accessed June 2025).

6 CEC. 2024c. Electricity Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/elecbycounty.aspx and http://www.ecdms.energy.ca.gov/elecbyutil.aspx (accessed June 2025).

7 Ibid.

3.6.3.2 Natural Gas

Natural gas is a nonrenewable fossil fuel. Fossil fuels form when layers of decomposing plant and animal matter are exposed to intense heat and pressure under the surface of the Earth over millions of years. Natural gas is a combustible mixture of hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas is found in naturally occurring reservoirs in deep underground rock formations. Natural gas is used for a variety of uses (e.g., heating buildings, generating electricity, and powering appliances such as stoves, washing machines and dryers, gas fireplaces, and gas grills).

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-State imports for nearly 90 percent of its natural gas supply.[8]

As mentioned above, the Project site is vacant; therefore, there is currently no natural gas consumed within the Project site. The Southern California Gas Company (SoCalGas) is the natural gas service provider for the Project site. According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026,458,755 therms.[9] Of this total, Riverside County consumed 431,052,392 therms.[10]

3.6.3.3 Petroleum/Transportation Energy

Petroleum is also a nonrenewable fossil fuel. Petroleum is a thick, flammable, yellow-to-black mixture of gaseous, liquid, and solid hydrocarbons that occurs naturally beneath the Earth's surface. Petroleum is primarily recovered by oil drilling. It is refined into a large number of consumer products, primarily fuel oil, gasoline, and diesel.

The average fuel economy for light-duty vehicles (automobiles, pickups, vans, and sport utility vehicles [SUVs]) in the United States has steadily increased from approximately 14.9 miles per gallon (mpg) in 1980 to 22.6 mpg in 2023.[11] The average fuel economy for heavy-duty trucks in the United States has also steadily increased, from 5.7 mpg in 2013 to a projected 8.0 mpg in 2021.[12] Federal and State fuel economy standards require the continued increase of fuel efficiency in passenger and commercial fleets. Gasoline is the most used transportation fuel in California, with 97 percent of all gasoline consumed by light-duty cars, pickup trucks, and SUVs. In 2022, the most recent year available, total gasoline consumption in California was 314.15 million barrels, or 1,586.1 trillion British thermal units (BTU). Of the total gasoline consumption, 296.948 million barrels, or 1,499.3 trillion BTU, were

8 CEC. n.d. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed June 2025).

9 CEC. 2024d. Gas Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx and http://www.ecdms.energy.ca.gov/gasbyutil.aspx (accessed June 2025).

10 Ibid.

11 United States Department of Transportation (USDOT). 2025. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed June 2025).

12 CEC. 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed June 2025).

consumed for transportation.[13] Based on fuel consumption data obtained from the EMFAC2021, 615.4 million gallons of gasoline and 347.1 million gallons of diesel were consumed by vehicle trips in Riverside County in 2024.

3.6.4 Regulatory Setting

Federal and State agencies regulate energy use and consumption through various means and programs. On the federal level, the United States Department of Transportation (USDOT), the United States Department of Energy, and the United States Environmental Protection Agency are three federal agencies with substantial influence over energy policies and programs. Generally, federal agencies influence and regulate transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure improvements. On the State level, the California Public Utilities Commission (CPUC) and the CEC are two agencies with authority over different aspects of energy.

The CPUC regulates privately owned electric, natural gas, telecommunication, water, railroad, rail transit, and passenger transportation companies and serves the public interest by protecting consumers and ensuring the provision of safe, reliable utility service and infrastructure at reasonable rates, with a commitment to environmental enhancement and a healthy California economy.

The CEC is the State's primary energy policy and planning agency. The CEC forecasts future energy needs, promotes energy efficiency, supports energy research, develops renewable energy resources, and plans for/directs State response to energy emergencies.

The applicable federal, State, regional, and local regulatory framework is discussed below.

3.6.4.1 Federal Regulations

The following federal regulations would be applicable to the proposed Project.

Energy Policy Act of 2005. The Energy Policy Act of 2005 (42 United States Code, Section 13201 et seq.) seeks to reduce reliance on nonrenewable energy resources and provide incentives to reduce current demand on these resources. For example, under this act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products (including hybrid vehicles), building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Corporate Average Fuel Economy Standards. On March 31, 2022, the National Highway Traffic Safety Administration finalized the Corporate Average Fuel Economy (CAFE) standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 53.5 mpg for passenger cars and light trucks in model

[13] United States Energy Information Administration (EIA). 2022. California State Profile and Energy Estimates, Data. Website: www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid=CA (accessed June 2025).

year 2026 by increasing fuel efficiency by 8 percent annually for model years 2024–2025, and 10 percent annually for model year 2026. The final standards are estimated to save over 200 billion gallons of gasoline between model years 2030 and 2050.[14]

3.6.4.2 State Regulations

The following State regulations would be applicable to the proposed Project.

Assembly Bill 1575, Warren-Alquist Act. In 1975, largely in response to the oil crisis of the 1970s, the State Legislature adopted Assembly Bill (AB) 1575 (also known as the Warren-Alquist Act), which created the CEC. The statutory mission of the CEC is to forecast future energy needs, license power plants of 50 megawatts (MW) or larger, develop energy technologies and renewable energy resources, plan for and direct State responses to energy emergencies, and, perhaps most importantly, promote energy efficiency through the adoption and enforcement of appliance and building energy efficiency standards. AB 1575 also amended Public Resources Code (PRC) Section 21100(b)(3) and *State CEQA Guidelines* Section 15126.4 to require EIRs to include, where relevant, mitigation measures proposed to minimize the wasteful, inefficient, and unnecessary consumption of energy caused by a project. Thereafter, the State Resources Agency created Appendix F to the *State CEQA Guidelines*. Appendix F assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. Appendix F of the *State CEQA Guidelines* also states that the goal of conserving energy implies the wise and efficient use of energy and the means of achieving this goal, including (1) decreasing overall per capita energy consumption; (2) decreasing reliance on fossil fuels such as coal, natural gas, and oil; and (3) increasing reliance on renewable energy sources.

Senate Bill 1389, Energy: Planning and Forecasting. In 2002, the State Legislature passed Senate Bill (SB) 1389, which required the CEC to develop an integrated energy plan every 2 years for electricity, natural gas, and transportation fuels. The plan calls for the State to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the least environmental and energy costs. To further this policy, the plan identifies a number of strategies, including assistance to public agencies and fleet operators in implementing incentive programs for zero-emission vehicles and their infrastructure needs, and encouragement of urban designs that reduce vehicle miles traveled (VMT) and accommodate pedestrian and bicycle access.

In compliance with the requirements of SB 1389, the CEC adopts an Integrated Energy Policy Report every 2 years and an update every other year. The most recently adopted report includes the *2024 Integrated Energy Policy Report Update*.[15] The *2024 Integrated Energy Policy Report Update* covers a broad range of topics, including decarbonizing buildings, integrating renewables, energy efficiency,

[14] National Highway Traffic Safety Administration. 2024. *Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027 and Beyond and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030 and Beyond*. June 24. Website: https://www.federalregister.gov/documents/2024/06/24/2024-12864/corporate-average-fuel-economy-standards-for-passenger-cars-and-light-trucks-for-model-years-2027 (accessed September 2025).

[15] California Energy Commission. 2024e. *2024 Integrated Energy Policy Report Update.* Docket Number 24-IEPR-01.

energy equity, integrating renewable energy, updates on Southern California electricity reliability, climate adaptation activities for the energy sector, natural gas assessment, transportation energy demand forecast, and the California Energy Demand Forecast. The *2024 Integrated Energy Policy Report Update* provides the results of the CEC's assessments of a variety of energy issues facing California.

Renewables Portfolio Standard. The California Renewables Portfolio Standard (RPS) program was established in 2002 by SB 1078. SB 1078 initially required that 20 percent of electricity retail sales be served by renewable resources by 2017; however, this standard has become more stringent over time. In 2006, SB 107 accelerated the standard by requiring that the 20 percent mandate be met by 2010. In April 2011, SB 2 required that 33 percent of electricity retail sales be served by renewable resources by 2020. In 2015, SB 350 established tiered increases to the RPS of 40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. In 2018, SB 100 increased the requirement to 60 percent by 2030 and required all the State's electricity to come from carbon-free resources by 2045. SB 100 took effect on January 1, 2019.[16]

California Energy Code. Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, in Part 6 of Title 24 of the California Code of Regulations (CCR), referred to as the Energy Code. The CEC first adopted the Building Energy Efficiency Standards for Residential and Non-residential Buildings in 1978 in response to a legislative mandate to reduce energy consumption in the State. The Energy Code is updated every 3 years, with the most recent update consisting of the 2022 Energy Code that became effective January 1, 2023. Mid-cycle supplements to the 2022 Code became effective on July 1, 2024. The efficiency standards apply to both new construction and rehabilitation of both residential and nonresidential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in the Energy Code.

California Green Building Standards Code. In 2010, the California Building Standards Commission (CBSC) adopted additional Building Energy Efficiency Standards in Part 11 of Title 24 of the CCR, referred to as the California Green Building Standards Code (CALGreen). CALGreen took effect on January 1, 2011. It is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. CALGreen establishes mandatory measures for residential and nonresidential building construction and encourages sustainable construction practices in the following five categories: (1) planning and design, (2) energy efficiency, (3) water efficiency and conservation, (4) material conservation and resource efficiency, and (5) indoor environmental quality. Although CALGreen was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen standards have the additional benefit of reducing energy consumption from residential and nonresidential buildings subject to the standards.

California Energy Efficiency Strategic Plan. On September 18, 2008, the CPUC adopted California's first Long-Term Energy Efficiency Strategic Plan, presenting a roadmap for energy efficiency in

[16] California Public Utilities Commission (CPUC). 2019. Renewables Portfolio Standard Program. Website: cpuc.ca.gov/rps (accessed April 2025).

California. The plan articulates a long-term vision and goals for each economic sector and identifies specific near-term, mid-term, and long-term strategies to assist in achieving those goals. The plan also reiterates the following four specific programmatic goals known as the "Big Bold Energy Efficiency Strategies" that the CPUC established in Decisions D.07-10-032 and D.07-12-051[17]:

- All new residential construction will be zero net energy (ZNE) by 2020.[18]
- All new commercial construction will be ZNE by 2030.
- 50 percent of commercial buildings will be retrofitted to ZNE by 2030.
- 50 percent of new major renovations of State buildings will be ZNE by 2025.

Assembly Bill 1493, Pavley, Vehicular Emissions: Greenhouse Gases. AB 1493 was enacted on July 22, 2002, requiring CARB to develop and adopt regulations that reduce GHGs emitted by passenger vehicles and light-duty trucks. Under this legislation, CARB adopted regulations to reduce GHG emissions from noncommercial passenger vehicles (cars and light-duty trucks). Although aimed at reducing GHG emissions specifically, a co-benefit of the AB 1493 standards is an improvement in fuel efficiency and, consequently, a reduction in fuel consumption.

Assembly Bill 1007, State Alternative Fuels Plan. Signed into law by Governor Arnold Schwarzenegger on September 29, 2005, AB 1007 required the CEC to prepare a plan to increase the use of alternative fuels in California. The State Alternative Fuels Plan was prepared by the CEC with CARB and in consultation with other federal, State, and local agencies to reduce petroleum consumption; increase use of alternative fuels (e.g., ethanol, natural gas, liquefied petroleum gas, electricity, and hydrogen); reduce GHG emissions; and increase in-State production of biofuels. The State Alternative Fuels Plan recommends a strategy that combines private capital investment, financial incentives, and advanced technology that would increase the use of alternative fuels; result in significant improvements in the energy efficiency of vehicles; and reduce trips and VMT through changes in travel habits and land management policies. The Alternative Fuels and Vehicle Technologies Funding Program legislation (AB 118, Statutes of 2007) proactively implements this plan.

Assembly Bill 118. AB 118 created the Clean Transportation Program (formerly known as the Alternative and Renewable Fuel and Vehicle Technology Program). The Clean Transportation Program aims to reduce GHG emissions and petroleum dependence by accelerating the development of zero-emission and near-zero-emission technologies.

Executive Order S-01-07, Low Carbon Fuel Standard. Executive Order (EO) S-01-07 formally established the goal of a low carbon fuel standard (LCFS) to reduce the carbon intensity of transportation fuels by 10 percent by 2020, facilitate the reduction of pollutants and GHG emissions, and diversify energy used for transportation, which would have the effect of improving energy

[17] California Public Utilities Commission. n.d. *Zero Net Energy*. Website: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/zero-net-energy (accessed August 2025).

[18] Achievement of this goal was determined not yet to be feasible in time for the 2019 Building Energy Efficiency Standards (effective 2020), but State regulators continue to take steps toward this goal.

efficiency. The EO directed CARB to determine if an LCFS can be adopted as an early action measure. In 2009, CARB approved the LCFS (17 CCR § 95480 et seq.), and it took effect on January 1, 2011.

California Code of Regulations Title 20 Appliance Efficiency Standards. The 2006 Appliance Efficiency Regulations (20 CCR §§ 1601–1608) were adopted by the CEC on October 11, 2006, and approved by the State's Office of Administrative Law on December 14, 2006. The Appliance Efficiency Regulations regulate the sale of appliances in California and include energy performance, energy design, water performance, and water design standards for both federally regulated appliances and nonfederally regulated appliances. Twenty-three categories of appliances are included in the scope of these regulations. The standards within these regulations apply to appliances that are sold or offered for sale in California, except those sold wholesale in California for final retail sale outside the State and those designed and sold exclusively for use in recreational vehicles or other mobile equipment.

3.6.4.3 Regional Regulations

The following regional regulations would be applicable to the proposed Project.

Southern California Association of Governments 2020–2045 Regional Transportation Plan/ Sustainable Communities Strategy (Connect SoCal). The Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) (Connect SoCal) is Southern California's regional transportation plan to achieve the vehicle emissions reductions identified under SB 375. The 2020–2045 RTP/SCS retains the same purpose as the previous RTP/SCS plans in focusing and providing an integrated approach for accommodating population growth, household and employment growth, and transportation needs in the SCAG region, including a goal to reduce commuting distances. The projected regional development pattern identified in the 2020–2045 RTP/SCS would reduce per-capita VMT and thus fuel use, which has the effect of reducing vehicular-travel-related GHG emissions and achieving the GHG reduction per-capita targets for the SCAG region, as well as reducing energy consumption. VMT associated with heavy-duty trucks involved in goods movement is outside the purview of the 2020–2045 RTP/SCS, which primarily focuses on VMT associated with passenger vehicles, improving freight mobility in the region, and transitioning to near-zero and zero-emissions technology.

3.6.4.4 Local Regulations

Lake Elsinore Municipal Code. Section 15.32.010 of the City of Lake Elsinore Municipal Code states: "the California Energy Code, 2022 Edition, as published by the International Code Council, shall be and become the energy code of the City, regulating all buildings in the City with respect to State energy requirements."[19]

[19] City of Lake Elsinore. 2024. *Lake Elsinore Municipal Code Section 15.32.010 Energy Code – Established.* May 28. Website: https://www.codepublishing.com/CA/LakeElsinore/html/LakeElsinore15/LakeElsinore1532.html#:~:text=15.32.-,010%20Energy%20code%20%E2%80%93%20Established.,respect%20to%20State%20energy%20requirements (accessed August 2025).

3.6.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed Project would have a significant adverse impact with respect to energy if it would:

Threshold 3.6.1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation, or

Threshold 3.6.2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.6.6 Project Impacts

Threshold 3.6.1: Would the Project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. Construction and operation impacts of the proposed Project related to wasteful, inefficient, or unnecessary consumption of energy resources are discussed below.

Construction-Period Energy Use. The anticipated construction schedule assumes that construction of the proposed Project is expected to commence in April 2026 and would last through August 2027 for Project build out of the Onsite Development Area and would begin in September 2025 and last through May 2027 for the off-site/lift station improvements within the Offsite Improvements Area. Construction activities would include demolition, site preparation, grading, building construction, architectural coating, and paving activities. The proposed Project would also include off-site/lift station improvements that would consist of grading, building construction, paving, architectural coating, linear grubbing and land clearing, linear grading and excavation, linear drainage, utilities and sub-grade, and linear paving activities within the Offsite Improvements Area.

Construction activities require energy associated with the manufacture and transportation of building materials, grading activities, and building construction. Construction activities also typically require gasoline, diesel, and electricity to power construction-related equipment and do not involve the consumption of natural gas. Energy usage on the Project site during construction would be temporary.

Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline). It is anticipated that construction and vendor trucks hauling materials to and from the Project site would use diesel fuel, and construction workers traveling to and from the site would use a mix of gasoline-powered and diesel-powered vehicles.

Fuel consumption from transportation uses depends on the type and number of trips, VMT, the fuel efficiency of the vehicles, and the travel mode. Fuel consumption estimates are presented in Table 3.6.A. Estimates of fuel consumption (diesel fuel and gasoline) from construction equipment,

construction trucks, and construction worker vehicles were based on CalEEMod default construction equipment assumptions,[20],trip estimates from CalEEMod, and fuel efficiencies from EMFAC2021. The proposed Project would also require the use of electricity during construction activities. Electricity usage during Project construction was estimated based on the typical power cost of building construction per month identified in the *2024 National Construction Estimator*[21] and the SCE general service rate schedule for industrial services.[22] As shown in Table 3.6.A, the total electricity usage from Project construction-related activities is estimated to be approximately 1,657,567 kWh. Detailed energy calculations are included in Appendix F.

Table 3.6.A: Energy Consumption Estimates During Project Construction

Energy Type	Total Energy Consumption	Annual Energy Consumption	Annual Percentage Increase Countywide
Electricity Consumption (kWh/year)	1,657,567	828,734	<0.01
Gasoline Fuel (total gallons)	86,212	43,106	0.01
Diesel Fuel (total gallons)	179,122	89,561	0.03

Source: Urban Crossroads, *Baker Lake Elsinore Energy Tables* (June 3, 2025).

As shown in Table 3.6.A, construction of the proposed Project would consume approximately 1,657,567 kWh of electricity, 86,212 gallons of gasoline, and 179,122 gallons of diesel fuel during construction. As discussed above, construction associated with the proposed Project is expected to commence in April 2026 and would last through August 2027 for Project build out of the Onsite Development Area and would begin in September 2025 and continue through May 2027 for the off-site/lift station improvements within the Offsite Improvements Area. Therefore, when averaged over approximately 2 years, construction of the proposed Project would consume approximately 828,734 kWh of electricity, 43,106 gallons of gasoline, and 89,561 gallons of diesel fuel per year during construction. Based on fuel consumption obtained from EMFAC2021, approximately 615.4 million gallons of gasoline and 347.1 million gallons of diesel were consumed from vehicle trips in Riverside County in 2024. Therefore, construction of the proposed Project would increase the annual construction generated fuel use in Riverside County by approximately 0.01 percent for gasoline and approximately 0.03 percent for diesel fuel usage. In addition, as discussed above, total electricity consumption in Riverside County in 2022 was approximately 17,780,573,271 kWh; therefore, construction of the proposed Project would increase the annual electricity consumption in Riverside County by less than 0.01 percent.

As demonstrated above, Project construction would have a negligible effect on local and regional energy supplies. Furthermore, impacts related to energy use during construction would be temporary and relatively small in comparison to Riverside County's overall use of the State's available energy

[20] According to the CalEEMod User Guide, default assumptions in CalEEMod utilize widely accepted methodologies for estimating emissions that can be used when site-specific information is not available. Sources of these methodologies and default data include, but are not limited to, the USEPA AP-42 emission factors, CARB vehicle emission models, and studies commissioned by the CEC and CalRecycle.

[21] Pray, Richard. 2024 National Construction Estimator. Carlsbad: Craftsman Book Company.

[22] Southern California Edison. Schedule GS-1 General Service. Regulatory Information - Rates Pricing. Website: https://www.sce.com/regulatory/tariff-books/rates-pricing-choices (accessed June 2025)

resources. In addition, the proposed Project would be required to comply with Title 13, Sections 2449 and 2485, of the CCR, which limit idling from both on-road and off-road diesel-powered equipment and are enforced by the CARB. Further, construction activities are not anticipated to result in inefficient use of energy, as gasoline and diesel fuel would be supplied by construction contractors that would conserve the use of their supplies to minimize their costs. The proposed Project would not cause or result in the need for additional energy facilities or an additional or expanded delivery system. For these reasons, fuel consumption during Project construction would not be inefficient, wasteful, or unnecessary. Therefore, construction energy impacts would be **less than significant**, and mitigation is not required.

Operational Energy Use. Operational energy use is typically associated with natural gas use, electricity consumption, and fuel used for vehicle trips. Electricity consumption was estimated for the proposed Project using default energy intensities by land use type in CalEEMod. The proposed Project would be all-electric and would not require the use of natural gas except for use of the on-site cargo handling equipment within the Onsite Development Area.

As discussed above, the Title 24 Energy Efficiency Standards contain energy efficiency requirements for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. The Title 24 Energy Efficiency Standards establish performance metrics in the form of an "energy budget" based on energy consumption per square foot of floor space. The Title 24 Energy Efficiency Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference appendices are adopted along with the Title 24 Energy Efficiency Standards containing data and various compliance tools to help builders achieve compliance.

CalEEMod divides building electricity and natural gas use into uses that are subject to Title 24 Energy Efficiency Standards and those that are not. For electricity, Title 24 uses include the major building envelope systems covered by Part 6 of the Title 24 Energy Efficiency Standards (e.g., space heating, space cooling, water heating, and ventilation). Non-Title 24 uses include all other end-uses (e.g., appliances, electronics, and other miscellaneous plug-in uses). Because some lighting is not considered as part of the building envelope energy budget, CalEEMod considers lighting as a separate electricity use category. For natural gas, uses are likewise categorized as Title 24 or non-Title 24. Title 24 uses include building heating and hot water end-uses. Non-Title 24 natural gas uses include appliances. However, the proposed Project would use all-electric appliances without any natural gas connections and would not include the use of propane or other fossils fuels for space heating, water heating, or indoor cooking, which was accounted for in CalEEMod.

In addition, the proposed Project would result in energy usage associated with gasoline and diesel fuel consumed by Project-related vehicle trips. Trip generation rates for the proposed Project were based on the *Scoping Agreement for Traffic Impact Study,*[23] which determined that the proposed Project would generate a total of 2,384 total trips per weekday, consisting of 1,400 passenger car trips and 984 truck trips. In addition, the proposed Project is expected to generate approximately 295 total

[23] EPD Solutions, Inc. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22, 2023, Revised March 22, 2024.

trips (including 182 passenger car trips and 113 truck trips) on Saturday and approximately 152 total trips (including 96 passenger car trips and 56 truck trips) on Sunday. The amount of operational fuel use was estimated using CARB's EMFAC2021 model, which provided projections for typical daily fuel usage in Riverside County.

The proposed Project would also consume diesel fuel associated with the two 300-horsepower (hp) diesel-powered emergency generators at the industrial buildings and one 350-hp diesel-powered emergency generator at the off-site lift station. The emergency generators were conservatively estimated to operate for up to 1 hour per day, 1 day per week, for up to 50 hours per year for maintenance and testing purposes. Use of the emergency generators would consume an estimated 13,683 gallons of diesel fuel per year, which is included in Table 3.6.B, below.

Additionally, the proposed Project would include up to four 175 hp, natural gas-powered cargo handling equipment, including a port tractor operating 4 hours per day for 365 days per year. The estimated on-site cargo handling equipment natural gas consumption was calculated off-model using EMFAC offroad emission factors and is included in Table 3.6.B, below.

Table 3.6.B shows electricity, natural gas, and fuel usage estimates associated with the proposed Project.

Table 3.6.B: Energy Consumption Estimates During Project Operation

Energy Type	Annual Energy Consumption	Percentage of Increase Countywide
Electricity Consumption (kWh/year)	7,117,782	0.04
Natural Gas Consumption (therms/year)	23,194	<0.01
Gasoline (gallons/year)	354,294	0.06
Diesel Fuel (gallons/year)	931,623	0.27

Source: Urban Crossroads, *Baker Lake Elsinore Energy Tables* (June 3, 2025).

As shown in Table 3.6.B, the estimated potential increase in electricity demand associated with the proposed Project is 7,117,782 kWh per year. Total electricity consumption in Riverside County in 2022 was 17,780,573,271 kWh. Therefore, operation of the proposed Project would increase the annual electricity consumption in Riverside County by approximately 0.04 percent.

Additionally, as shown in Table 3.6.B, the estimated potential increase in natural gas demand associated with use of the on-site cargo handling equipment is 23,194 therms per year. Total natural gas consumption in Riverside County in 2022 was approximately 431,052,392 therms. Therefore, use of the on-site cargo handling equipment would negligibly increase the annual natural gas consumption in Riverside County by less than 0.01 percent.

The proposed Project would also result in energy usage associated with gasoline and diesel fuel consumed by Project-related vehicle trips. As shown in Table 3.6.B, the increase in fuel use associated with the vehicle trips generated by the proposed Project is estimated at 354,294 gallons of gasoline and 931,623 gallons of diesel fuel per year. Based on fuel consumption obtained from EMFAC2021, approximately 615.4 million gallons of gasoline and 347.1 million gallons of diesel were consumed from vehicle trips in Riverside County in 2024. Therefore, vehicle trips associated with the proposed

Project would increase the annual fuel use in Riverside County by 0.06 percent for gasoline and approximately 0.27 percent for diesel fuel usage.

Furthermore, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. The proposed Project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Energy Code. The Energy Code establishes minimum energy efficiency requirements for new buildings and additions or alterations to existing buildings.

Additionally, as shown in Table 3.6.B, above, the proposed Project would result in a minimal increase in annual fuel use in Riverside County. Vehicles and trucks associated with trips to and from the Project site would be subject to fuel economy and efficiency standards, which are applicable throughout the State. As such, the fuel efficiency of vehicles and trucks associated with Project operations would increase throughout the life of the proposed Project. The proposed Project would also provide electric vehicle (EV) infrastructure, which would further promote fuel-efficient vehicles. Therefore, implementation of the proposed Project would not result in a substantial increase in transportation-related energy uses and would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy.

As described above, the proposed Project would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy and would incorporate renewable energy or energy efficiency measures into building design, equipment uses, and transportation. Impacts would be **less than significant**, and no mitigation would be required.

Threshold 3.6.2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As discussed above, the most recently adopted CEC energy report is the *2024 Integrated Energy Policy Report Update*.[24] The *2024 Integrated Energy Policy Report Update* provides the results of the CEC's assessments of a variety of energy issues facing California. Many of these issues will require action if the State is to meet its climate, energy, air quality, and other environmental goals while maintaining energy reliability and controlling costs. The *2024 Integrated Energy Policy Report Update* covers a broad range of topics, including implementation of SB 350 (Clean Energy and Pollution Reduction Act of 2015), integrated resource planning, distributed energy resources, transportation electrification, solutions to increase resiliency in the electricity sector, energy efficiency barriers faced by disadvantaged communities, demand response, transmission and landscape-scale planning, the California Energy Demand Preliminary Forecast, the preliminary transportation energy demand forecast, renewable gas (in response to SB 1383), updates on Southern California electricity reliability, the natural gas outlook, and climate adaptation and resiliency.

Additionally, as discussed above, in 2023, California's electricity was generated primarily by natural gas (43.68 percent), non-GHG and renewable sources (56.09 percent), large hydroelectric (12.55

[24] CEC. 2024e. *2024 Integrated Energy Policy Report Update.* Docket Number 24-IEPR-01.

percent), nuclear (8.22 percent), coal (0.12 percent), and other unspecified sources. Total electric generation in California in 2023 was 281,140 GWh.[25]

As indicated in the analysis above, energy usage on the Project site during construction would be temporary in nature. In addition, energy usage associated with operation of the proposed Project would be relatively small in comparison to the State's available energy sources, and energy impacts would be negligible at the regional level. In addition, as discussed above, the proposed Project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Energy Code. The Energy Code establishes minimum energy efficiency requirements for new buildings and additions or alterations to existing buildings. Additionally, per Title 24 requirements, the proposed Project would be required to incorporate solar for the office portion of the building, which would help to reduce electricity consumption associated with the proposed Project.

Because California's energy conservation planning actions are conducted at a regional level, and because the Project's total impact to regional energy supplies would be minor, the proposed Project would not conflict with California's energy conservation plans as described in the CEC *2024 Integrated Energy Policy Report Update*. Therefore, the proposed Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and this impact would be **less than significant**. Mitigation is not required.

3.6.7 Level of Significance Prior to Mitigation

The proposed Project would result in less than significant impacts related to energy.

3.6.8 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures or mitigation measures are applicable to the proposed Project pertaining to energy.

3.6.9 Level of Significance after Mitigation

No mitigation is required. The proposed Project would not result in potentially significant impacts related to energy.

3.6.10 Cumulative Impacts

The proposed Project would have a significant effect on the environment if it, in combination with other past, present, and future projects, would contribute to a significant cumulative impact related to energy.

The geographic area for cumulative analysis of electricity is within the SCE service area, while the geographic area for cumulative analysis of natural gas service is within the SoCalGas service area. Although the proposed Project would result in a net increase in demand for electricity, this increase would not require SCE to expand or construct infrastructure that could cause substantial environmental impacts. As discussed previously, total electricity consumption in SCE's service area in

[25] CEC. 2024b. 2023 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation (accessed June 2025).

2022 was 85,870 GWh. By 2030, consumption is anticipated to increase by approximately 12,000 GWh for the low-demand scenario and by approximately 22,000 GWh for the high-demand scenario.[26] While this forecast for the overall service area represents a large increase in electricity consumption, the proposed Project's share of cumulative consumption would be negligible in comparison. The proposed Project, in combination with cumulative development, is well within SCE's systemwide net annual increase in electricity supplies over the 2018 to 2030 period, and there are sufficient planned electricity supplies in the region for estimated net increases in energy demands. Furthermore, as demonstrated in Table 3.6.B, above, the estimated potential increase in electricity demand associated with the proposed Project is 7,117,782 kWh per year. Therefore, operation of the proposed Project would increase the annual electricity consumption in the SCE service area by approximately 0.01 percent. As such, the proposed Project's share of cumulative electricity consumption would be negligible. In addition, the proposed Project is required to comply with various federal and State government legislation to improve energy efficiency in buildings, equipment, and appliances, which would help to reduce electricity consumption associated with the proposed Project. Therefore, the proposed Project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of electricity would not be cumulatively considerable.

Similarly, additional natural gas infrastructure is not anticipated due to cumulative development. Total natural gas consumption in SoCalGas' service area in 2022 was 5,026 million therms (5,026,458,755 therms). As stated above, the proposed Project would use all-electric appliances without any natural gas connections and would not include the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. The proposed Project would not require the use of natural gas except for use of the on-site cargo handling equipment within the Onsite Development Area. Therefore, the proposed Project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of natural gas would not be cumulatively considerable.

The proposed Project would also result in energy usage associated with gasoline and diesel fuel consumed by Project-related vehicle trips. As shown in Table 3.6.B, the increase in fuel use associated with the vehicle trips generated by the proposed Project is estimated at 354,294 gallons of gasoline and 931,623 gallons of diesel fuel per year. Based on fuel consumption obtained from EMFAC2021, approximately 615.4 million gallons of gasoline and 347.1 million gallons of diesel fuel were consumed from vehicle trips in Riverside County in 2024. Therefore, vehicle trips associated with the proposed Project would increase the annual fuel use in Riverside County by 0.06 percent for gasoline and approximately 0.27 percent for diesel fuel usage. As such, although transportation energy use would increase, this negligible increase in transportation energy use would not represent a major amount of energy use when compared to the amount of existing fuel consumption and total number of vehicle trips and VMT throughout Riverside County and the region.

In addition, the proposed Project would include EV charging infrastructure that, at minimum, would meet the Tier 2 Nonresidential Voluntary Measures of CALGreen, Section A5.106.5.3.2. The proposed Project is designed to include 24 EV charging spaces installed and operational upon completion, with infrastructure in place to accommodate an additional 69 EV charging spaces for future use, which

[26] CEC. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed June 2025).

would help to reduce fuel usage associated with the proposed Project. Additionally, as demonstrated in Section 3.8, Greenhouse Gas Emissions, the proposed Project would be required to comply with applicable current and future regulatory requirements, which include (through vehicle manufacturer compliance): Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer Rule, the Clean Construction Program, the In-use Off-Road Diesel-Fueled Fleets Regulation, the Off-Road Zero-Emission Targeted Manufacturer Rule, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Compliance with these requirements would also help to reduce fuel usage associated with the proposed Project. Further, as noted in the *Vehicle Miles Traveled (VMT) Screening Analysis Memorandum,*[27] the proposed Project is located in a low-VMT area and therefore is screened out of the VMT analysis and would not result in an inefficient or wasteful use of transportation energy.

As such, the proposed Project, in combination with other past, present, and potential future projects, would not result in inefficient, wasteful, and unnecessary consumption of energy. Therefore, the proposed Project's contribution to impacts related to the inefficient, wasteful, and unnecessary consumption of energy would not be cumulatively considerable, and this impact would be **less than significant**. No mitigation is required.

[27] EPD Solutions, Inc. Baker Lake Elsinore Vehicle Miles Traveled (VMT) Screening Analysis Memorandum. 2024.

3.7 GEOLOGY AND SOILS

This section of the Draft Environmental Impact Report (EIR) discusses the existing geology and soils setting and provides an analysis of the potential significant impacts anticipated with implementation of the proposed Project related to geology and soils. This section also addresses potential impacts due to the local geology underlying the Project site, as well as slope stability, ground settlement, soil conditions, grading, and regional and local seismic conditions. This section summarizes information provided in the *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California* (Geotechnical Evaluation).[1] This section also evaluates potential significant impacts to paleontological resources and summarizes information provided in the *Paleontological Resources Assessment Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California* (Paleontological Assessment)[2] and *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California* (Paleontological Resources Addendum),[3] included as Appendix G-1, Appendix G-2, and Appendix G-3, respectively, to this Draft EIR.

Data from the City of Lake Elsinore (City) General Plan, City of Lake Elsinore General Plan EIR, City of Lake Elsinore Municipal Code, and State and federal studies of geologic and seismic hazards in the vicinity of the city of Lake Elsinore are also incorporated into this section.

3.7.1 Scoping Process

Potential impacts to geology and soils were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received no comments concerning the proposed Project's potential to cause significant impacts to geology and soils in response to the Notice of Preparation (NOP), which was circulated between July 19 and August 19. For copies of the NOP comment letters, refer to Appendix A-1 through A-3 of this Draft EIR.

3.7.2 Methodology

To assess the impacts of the proposed Project with respect to geological and soil conditions, LGC Geotechnical conducted a Geotechnical Evaluation, which included a review of available geotechnical background information, a subsurface geotechnical evaluation of the area of proposed development, laboratory testing of select soil samples from the subsurface geotechnical evaluation, and recommendations for the development of the proposed Project. The discussion below describes the scope of the exploration, including methods used during site reconnaissance and the results of pertinent prior explorations, laboratory tests, and engineering analyses.

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1 LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. January 31. Appendix G-1.

2 CRM TECH. 2024. *Paleontological Resources Assessment Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* January 18. Revised August 15, 2024. Appendix G-2.

3 CRM TECH. 2025. *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* May 28. Appendix G-3.

To assess impacts of the proposed Project with respect to paleontological resources, CRM TECH conducted a Paleontological Assessment, which included a paleontological records search, literature review, and field inspection of the Project site. CRM TECH also prepared a Paleontological Resources Addendum that referenced the paleontological records search, literature review, and data collected during the field inspection to encompass an expanded Offsite Improvements Area previously not included in the Paleontological Assessment. The discussion below describes the scope of the assessment, including methods used during the field inspection and the results of the records search, literature review, and field inspection.

3.7.2.1 Background Research and Data Review

In addition to preparation of a Geotechnical Evaluation and field explorations, LGC Geotechnical reviewed existing geologic literature (i.e., geologic maps, boring logs, and other relevant data).

The paleontological resources record search for the Project site was performed by the Western Science Center (WSC) in Hemet, California. The WSC maintains files of regional paleontological localities, as well as supporting maps and documents. The records search results were used to identify previously performed paleontological resource assessments and known paleontological localities within a 1-mile radius of the Project site's location. In conjunction with the records search, CRM TECH reviewed geological literature pertaining to the Project site and surrounding area. Sources consulted include primarily published literature on regional geology, topographic, geologic, and soil maps of the Lake Elsinore area, the County of Riverside GIS database, aerial and satellite images available at the Nationwide Environmental Title Research (NETR) Online website, and through Google Earth software and other materials in the CRM TECH library, including unpublished reports produced during similar studies in the vicinity.

3.7.2.2 Field Investigation and Laboratory Testing

The field exploration for the Geotechnical Evaluation included excavation of 3 large-diameter (bucket-auger) borings, 14 small-diameter hollow-stem auger borings, and 14 exploratory test pits. The maximum depth of the three bucket-auger borings was approximately 100 feet below existing grade. The bucket-auger borings were excavated to evaluate the geologic structure of the underlying bedrock materials and to obtain samples for laboratory testing. The small-diameter hollow-stem auger borings were drilled to depths ranging from approximately 3 to 50 feet below existing grades, and soil samples for laboratory testing were collected. The exploratory test pits were excavated utilizing a standard backhoe with a 3-foot bucket in order to estimate removal depths of geologic materials and obtain samples for laboratory testing. Infiltration testing was also performed within five of the borings at depths ranging from approximately 3 to 12 feet below existing grade. One infiltration test was abandoned due to groundwater that was encountered at a depth of approximately 11 feet, prior to the design depth of the infiltration test being reached. Laboratory testing conducted as part of the Geotechnical Evaluation included in-situ moisture content and in-situ dry density, grain size analysis, Atterberg limits,[4] expansion index, laboratory compaction, consolidation, direct shear, R-value, and corrosion testing.

[4] Atterberg limits area basic measure of the critical water contents of a fine-grained soil: its shrinkage limit, plastic limit, and liquid limit.

The field inspection for the Paleontological Assessment was conducted in two phases. On November 3, 2023, CRM TECH surveyed the majority of the Project site by walking a series of parallel northeast-southwest transects spaced 15 meters (approximately 50 feet) apart. Ground visibility was generally poor (5 to 10 percent) over the property due to dense vegetation except where past development disturbances, vehicular intrusions, or recent soil testing (associated with the proposed Project)[5] had cleared the vegetation and/or prevented vegetation growth. On December 10, 2023, CRM TECH surveyed the remainder of the Project site. Similar to the initial survey, visibility of the native ground surface was poor (5 to 10 percent) over most of the acreage due to the presence of dense vegetation as well as pavement along Nichols Road. In light of past ground disturbances in the vicinity of the Project site, the reduced ground visibility was not considered a significant hindrance to the survey efforts.

3.7.3 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within the region and the Project site as it relates to geology and soils.

The approximately 140.04-acre Project site consists of undeveloped land and public road rights-of-way (ROWs). The Project site consists of four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of ROW improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities, and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

3.7.3.1 Regional Geology

The Project site is located on the western edge of the Perris Block within the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges are characterized by steep, elongated valleys that run west to northwest. The northwest-trending topography is dictated by the Elsinore Fault Zone, which extends southeast from the San Gabriel River Valley to the United States/Mexico border. The Santa Ana Mountains are located along the western side of the Elsinore Fault Zone, while the Perris Block is located along the eastern side of the Elsinore Fault Zone. As discussed in Section 3.7.3.3, Seismicity and Faulting, there are no known active or potentially active faults within the Project site. Please refer to this section for additional details on seismic and fault conditions. The mountainous regions are underlain by Pre-Cretaceous, metasedimentary and metavolcanic rocks and Cretaceous plutonic rocks of the Southern California Batholith. Tertiary and Quaternary rocks are generally comprised of nonmarine sediments consisting of sandstone, mudstones, conglomerates, and occasional volcanic units.

3.7.3.2 Project Site and Vicinity

The 140.04-acre Project site is irregular in shape and generally bounded by undeveloped land in all directions. The Project site in Lake Elsinore is just to the west of Interstate (I-)15 and includes

[5] Testing for the project site was completed in September 2023.

segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Peirce Street, and an above-ground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). Elevations within the Project site range from approximately 1,260 feet to 1,400 feet above mean sea level (amsl), inclining gradually to the north and the southwest, with the lowest elevations in the central portion.

The Geotechnical Evaluation found that the primary bedrock unit underlying the Project site is the Tertiary Silverado Formation. Surficial units consisting of undocumented artificial fill, topsoil, colluvium, and alluvium overlie the bedrock. A brief description of each unit is as follows:

- **Undocumented Artificial Fill (afu):** Only one undocumented area of artificial fill was mapped to the site. Observed on the Onsite Development Area in the central portion of the Project site, this fill location is a relatively thin zone of undocumented artificial fill. This observed trash and soil pit approximately 9 feet in depth, located adjacent to an old building pad, is the only undocumented fill mapped on the site. The undocumented fill consists of loose, dry, sandy silt with some trash and debris. The undocumented fill is considered potentially compressible and would need to be removed as it is encountered throughout the Project site to competent formational material.[6] Although the observed undocumented fill was found at 9 feet in depth, deeper undocumented fill requiring deeper removals may be encountered during site grading.

- **Topsoil/Colluvium (Qcol):** A relatively thin veneer of topsoil/colluvium covers much of the Project site. Topsoil and colluvium were not mapped across most of the Project site due to their relatively thin nature (less than 1 to 2 feet) and variable lateral extent. However, a thicker area of colluvium (up to 15 feet) was mapped in the southeast portion of the site within the Onsite Development Area. The topsoil/colluvium consists predominantly of red brown to light brown, dry to moist, loose to medium dense silty to clayey sand to sandy clay. The topsoil/colluvium is considered potentially compressible and would need to be removed to competent formational material in areas of proposed development. The potentially compressible topsoil is estimated to be approximately 1 to 2 feet in thickness in the hillside portions of the site. Topsoil/colluvium soils on the lower portions of the hillsides and on the margins of the on-site drainages can be expected to be up to approximately 15 feet in thickness. However, deeper removals may be encountered during site grading.

- **Quaternary Alluvium (Qal):** Quaternary-aged alluvium is present throughout the low-lying areas of the Project site. These soils consist of brown, dry to very moist, medium-dense silty sand and very stiff silt and clay with varying amounts of sand and gravel. The upper portion of the alluvium is considered potentially compressible and would need to be removed to competent alluvium or formational material in areas of proposed development. In general, unsuitable alluvial removals

[6] Competent formational materials are a rock layer or formation that is relatively strong and resistant to deformation, meaning it can withstand stress without significant folding or flowing.

are estimated to be up to approximately 8 feet below the surface. However, deeper removals may be encountered during site grading.

- **Tertiary Silverado Formation (Tsi):** The Tertiary Silverado Formation was deposited in a shallow marine and a nonmarine environment. This material consists of sandstone, siltstone, claystone and some cobble conglomerate. The Silverado Formation also locally includes clay, carbonaceous shale, and lignite beds. The majority of the Silverado Formation material encountered during the subsurface investigation of the Project site consisted of moderately bedded to massive material dipping predominantly to the south (about 5 to 30 degrees). Minor amounts of what may be Quaternary Pauba formation "fanglomerate" material was encountered at the top of the northeast-trending ridgelines but were not differentiated for the purposes of the Geotechnical Evaluation.

3.7.3.3 Seismicity and Faulting

The geologic structure of the entire Southern California area is dominated by northwest-trending faults associated with the San Andreas Fault System, with lesser amounts of motion accommodated by subparallel faults located predominantly west of the San Andreas fault, including the Elsinore, Newport-Inglewood, Rose Canyon, and Coronado Bank faults.

While the Project site is in a seismically active region, the Project site is not located within a mapped State of California Earthquake Fault-Rupture Hazard Zone per compiled California Geological Survey (CGS) maps or a County of Riverside (County) Fault Zone. In addition, no known active or potentially active faults are located within the Project site. The closest known active fault zones are the Elsinore (approximately 0.8 mile southwest of the Project site) and San Jacinto (approximately 19 miles northeast of the Project site) fault zones.

3.7.3.4 Groundwater Conditions

Groundwater was encountered at depths ranging from approximately 11 to 45 feet below ground surface (bgs). Based on nearby groundwater wells, the elevation of the nearby creek bottom approximately 750 feet northeast of the Project site, and groundwater data gathered during the subsurface evaluation, historic high groundwater is estimated to be approximately 10 feet bgs.[7] However, seasonal fluctuations of groundwater elevations should be expected over time. In general, groundwater levels fluctuate with the seasons, and local zones of perched groundwater may be present within the near-surface deposits due to local seepage or during rainy seasons.

3.7.3.5 Liquefaction and Lateral Spreading

Liquefaction and dynamic settlement of soils can be caused by strong vibratory motion due to earthquakes. Both research and historical data indicate that loose, saturated, granular soils or soils of low plasticity are susceptible to liquefaction and dynamic settlement. Liquefaction is typified by a loss of shear strength in the affected soil layer, thereby causing the soil to act as a viscous liquid. This effect may be manifested by excessive settlements and sand boils at the ground surface. Portions of the

[7] LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. Page 7. January 31. Appendix G-1.

Onsite Development Area and Offsite Improvement Area, near Baker Street and Pierce Street, are located within a zone of low to moderate liquefaction potential.[8]

Lateral spreading typically occurs as a form of horizontal displacement of relatively flat-lying alluvial material toward an open or "unconfined" face such as an open body of water, channel, or excavation. In soils, this movement is generally due to failure along a weak plane and is often associated with liquefaction. Due to the low potential for liquefaction, the Project site possesses a very low potential for lateral spreading.

3.7.3.6 Expansion Potential

Expansive soils contain types of clay minerals that occupy considerably more volume when they are wet or hydrated than when they are dry or dehydrated. Volume changes associated with changes in the moisture content of near-surface expansive soils can cause uplift or heave of the ground when they become wet or, less commonly, cause settlement when they dry out. The expansion potential of selected soil samples from the Project site was evaluated using the Expansion Index Test, Standard ASTM D4829. On a scale of 100, the Expansion Index of the selected soil samples ranged from 71 to 99, indicating that soils present on the Project site are anticipated to have "Medium" to "High" expansion potential.

3.7.3.7 Paleontological Resources

As discussed above, the soils present at the Project site consist of undocumented artificial fill (afu), topsoil/colluvium (Qcol), and quaternary alluvium (Qal), which overlay the Tertiary Silverado Formation (Tsi). Tsi is the Paleocene-age Silverado Formation, consisting of nonmarine and marine sandstone, siltstone, claystone, and some cobble conglomerate. The upper part of the Tsi is known to contain abundant marine mollusks. These soils represent young axial-channel deposits dating to the Holocene and late Pleistocene, old axial-channel deposits dating to the late to middle Pleistocene age, and old alluvial-channel deposits dating to the late to middle Pleistocene age.

In addition, the Riverside County General Plan designates the majority of the Onsite Development Area and portions of the Offsite Improvements Area along Terra Cotta Road and Pierce Street as having high sensitivity for paleontological resources ("High A") and the area along Collier Avenue as having low sensitivity. The Restoration Area and Construction/Improvements Buffer are located in areas mapped as low sensitivity for paleontological resources. High sensitivity includes not only the potential for yielding abundant vertebrate fossils, but also the potential for production of a few significant fossils that may provide new and significant data. High A, specifically, is based on formations or deposits that are known to contain, or have the appropriate age and conditions to contain, significant paleontological resources.

While the paleontological records search by the WSC indicated the presence of paleontological localities throughout Southern California that were discovered in sediment lithologies similar to those that that occur at the Project site, the records search by the WSC identified no known paleontological

[8] LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. Page 9. January 31. Appendix G-1.

localities within the Project site or within 1 mile of the Project site. In addition, no surface manifestation of any paleontological remains was observed within the Project site during the field inspection. Additionally, the Project site lies upon variable alluvial units of Holocene and late Pleistocene origin, as well as some Paleocene-age Silverado Formation. Pleistocene alluvial units are paleontologically sensitive, and invertebrate fossils have been recovered from Silverado Formations elsewhere.

3.7.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.7.4.1 Federal Policies and Regulations

There are no federal policies or regulations related to geology and soils that are applicable to the proposed Project.

3.7.4.2 State Policies and Regulations

Alquist-Priolo Earthquake Fault Zoning Act (1972). The Alquist-Priolo Earthquake Fault Zoning Act of 1972 and updates (California Public Resources Code [PRC], Section 2621, et seq.) is the principal California State guidance to prevent the construction of habitable structures on the surface trace of active earthquake faults. If an active fault is found, a structure for human occupancy must be set back from the fault (generally a 50-foot setback). The Alquist-Priolo Earthquake Fault Zoning Act only addresses the hazard of surface fault rupture; it does not consider other earthquake hazards.

Seismic Hazard Mapping Act (1990). The Seismic Hazard Mapping Act (SHMA) was adopted by the State in 1990 to address the potential hazards posed by secondary effects of seismic activity, including strong ground shaking, soil liquefaction, and associated ground failure and seismically induced landslides. The CGS prepares and provides local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The seismic hazard zones are referred to as “zones of required investigation” because site-specific geological investigations are required for construction projects within these areas. Before a project can be permitted, a geologic investigation, evaluation, and written report must be prepared by a licensed geologist to demonstrate that the potential hazards can be successfully mitigated.

California Building Code (within California Code of Regulations). Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission, and the code is also known as Title 24, Part 2, of the California Code of Regulations (CCR). The 2022 CBC took effect on January 1, 2023. Local jurisdictions often adopt local, more restrictive amendments that are based on local geographic, topographic, or climatic conditions. These codes provide minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions.

The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on site, and the strength of ground shaking with a specified probability at a site. The seismic ratings used in Section 1613.2 of the CBC are derived from the International Building Code specifications. The Project site, as well as most of Southern California, is located in Seismic Design Category D, which indicates areas expected to experience severe and destructive ground shaking but not located close to a major fault.

California Occupational Safety and Health Administration Regulations. The California Occupational Safety and Health Administration (Cal/OSHA) Regulations are codified as CCR Title 8. These regulations establish occupational safety standards for excavation, shoring, and trenching activities, as well as other construction activities.

Requirements for Geotechnical Investigations. Requirements for geotechnical investigations for subdivisions requiring tentative and final maps are provided in the California Health and Safety Code, Sections 17953 through 17955, and in Section 1802 of the CBC. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness.

California Public Resources Code Section 5097.5. Section 5097.5 of the PRC provides for the protection of cultural and paleontological resources and prohibits the removal, destruction, injury, or defacement of archaeological and paleontological features on any lands under the jurisdiction of State or local authorities. Specifically, PRC Section 5097.5 states the following:

- A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological, or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands.

- As used in this section, “public lands” means lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof.

A violation of this section is a misdemeanor.

3.7.4.3 Regional Policies and Regulations

There are no regional regulations related to geology and soils that are applicable to the proposed Project.

3.7.4.4 Local Policies and Regulations

City of Lake Elsinore Municipal Code. While the CBC provides minimum standards for building design in the State, local codes are permitted to be more restrictive than the CBC, but not less restrictive. Building and construction in the city are subject to the regulations of the City of Lake Elsinore Municipal Code, which has adopted standards that are at least as restrictive as CCR Title 24, Part 2, of

the CBC (2022). The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic design category. Uses constructed as part of the Project would adhere to the seismic and building standards in the City's Building Code and the CBC.

The following provisions of the City of Lake Elsinore Municipal Code address geologic hazards and paleontological resources:

- **Chapter 15.02.010 (California Building Standards Code):** Chapter 15.02 of the City of Lake Elsinore Municipal Code adopts the 2022 CBC, including all of its chapters, tables, indices, addenda, footnotes, and appendices, subject to the modifications as set forth in Title 15. The provisions of the CBC, as amended pursuant to Title 15 and the chapters set forth therein, shall constitute the building regulations of the City of Lake Elsinore.

- **Chapter 15.04 (Building Code):** Chapter 15.04 of the City of Lake Elsinore Municipal Code establishes the City's building code.

    - **Section 15.04.010:** States that the California Building Code, 2022 Edition, based on the 2021 International Building Code as published by the International Code Council, "shall be and become the building code of the City, regulating the erection, construction, enlargement, alteration, repair, moving, removal, demolition, conversion, occupancy, use, height, area and maintenance of all structures and certain equipment therein."

    - **Section 15.04.020:** Provides various amendments to the 2022 CBC.

    - **Section 15.04.030:** Establishes "very high fire hazard severity zones within the City of Lake Elsinore, as recommended by the Director of the California Department of Forestry and Fire Protection and as designated on the map entitled City of Lake Elsinore VHFHSZ, dated December 22, 2009, retained on file at the City of Lake Elsinore and which shall also be retained on file at the office of the State Fire Marshal."

- **Chapter 15.72 (Grading Standards):** Chapter 15.72 of the City of Lake Elsinore Municipal Code regulates grading activities.

    - **Section 15.72.020:** Requires minor design review by the City Engineer when grading is to be done on a site which has a natural slope of 10 percent or more on 25 percent or more of the site area. Minor design review, upon completion of an investigation, shall approve, disapprove, or approve with mitigating measures to be incorporated into the grading plan.

    - **Section 15.72.030:** Any application for a grading permit shall demonstrate by providing sufficient information that (1) the grading of a property shall not be excessive beyond that necessary for the use and drainage of the site; (2) the proposed grading is not to have an adverse environmental effect on surrounding property; (3) the grading of a project shall consider the surrounding property and shall blend in with the surrounding topography in areas that have been developed; and (4) the proposed grading does not constitute a surface mining operation.

- **Section 15.72.040:** Provides general criteria for grading activities, including the following:
  - In hillside grading, no cut or fill slopes shall be created that exceed 30 feet in vertical height, and any cut or fill slopes that exceed 10 feet in height shall not exceed 400 feet in horizontal length (except slopes required for public streets, which may exceed 400 feet in length). Design review may approve slopes exceeding these dimensions where slopes will be the result of earth contouring that design review determines will result in a natural appearance and will create no geological or erosion hazard.
  - All cut or fill slopes in excess of 3 feet and located within the front yard setback area shall be contoured to present a natural undulating appearance. Intersecting front and side intersecting slopes shall have corners rounded with a minimum radius of 10 feet.
  - Slopes exceeding 3 feet in height shall be provided with irrigation systems and sufficient permanent plants chosen from a list of plants suitable for hillside grading.
  - Developments may be recontoured if design review finds and determines that strict conformance with these regulations would result in an adverse visual or environmental impact.
- **Section 15.72.050:** Provides general requirements for the construction of retaining walls.
- **Section 15.72.065:** Provides general requirements related to the hauling of earth materials, including those that regulate the haul route, access roads, signs, inspections, time of hauling operations, notification, dust control, debris on city roadways, load limits, financial responsibility for damage to streets, bonds for grading to include street repairs, and other conditions

City of Lake Elsinore General Plan, Chapter 3.0, Public Safety and Welfare. Chapter 3.0 of the City of Lake Elsinore General Plan addresses potential natural and man-made hazards, including seismic and geologic hazards, within the city. The focus of Chapter 3.0 is on maintaining a healthy and safe physical environment and ensuring community welfare through access to effective and efficient, high-quality public services. The following goals and policies related to seismic and geologic hazards would be applicable to the proposed Project:

- **Goal 6:** Minimize the rise of loss of life, injury, property damage, and economic and social displacement due to seismic and geological hazards resulting from earthquakes and geological constraints.
  - **Policy 6.2:** Continue to require Alquist-Priolo and other seismic analyses be conducted for new development to identify the potential for ground shaking, liquefaction, slope failure, seismically induced landslides, expansion and settlement of soils, and other related geologic hazards for areas of new development in accordance with the Fault Rupture Hazard Overlay District adopted by the City of Lake Elsinore Zoning Code. The City may require site-specific remediation measures during permit review that may be implemented to minimize impacts in these areas.

City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. Chapter 4.0 of the City of Lake Elsinore General Plan describes paleontological resources within the city. The following goals and policies apply to the proposed Project:

- **Goal 8:** Preserve paleontological resources occurring within the city.
    - **Policy 8.1:** For development in areas delineated as "High" or "Undetermined" potential sensitivity for paleontological resources, require the project applicant to hire a certified paleontologist, who must perform a literature search and/or survey and apply the relevant treatment for the site as recommended by the Society for Vertebrate Paleontology.

3.7.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines*. Based on these thresholds, implementation of the proposed Project would have a significant adverse impact with respect to geology and soils if it would:

Threshold 3.7.1: 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 known fault? (Refer to Division of Mines and Geology Special Publication 42) (ii) Strong seismic ground shaking? (iii) Seismic-related ground failure, including liquefaction? (iv) Landslides,

Threshold 3.7.2: Result in substantial soil erosion or the loss of topsoil,

Threshold 3.7.3: 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-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse,

Threshold 3.7.4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property,

Threshold 3.7.5: 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, or

Threshold 3.7.6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

3.7.6 Project Impacts

Threshold 3.7.1: **Would the project 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 known fault? (Refer to Division of Mines and Geology Special Publication 42) (ii) Strong seismic ground shaking? (iii) Seismic-related ground failure, including liquefaction? (iv) Landslides?

Less Than Significant with Mitigation Incorporated

(i) Fault Rupture.

The Project site is not located within a mapped State of California Earthquake Fault-Rupture Hazard Zone, as defined by the State of California in the Alquist-Priolo Earthquake Fault Zone Act of 1972, or a County of Riverside Fault Zone. In addition, no known active or potentially active faults are located within the Project site. Therefore, the Geotechnical Evaluation determined the risk of ground rupture due to fault displacement beneath the site is low. **No impact** related to fault rupture would result from the implementation of the proposed Project.

(ii) Seismic Ground Shaking.

As indicated in the earlier section on Seismicity and Faulting, the Project site is located within a seismically active region, with a number of faults traversing or in proximity to the city, including the San Andreas, Elsinore, San Jacinto, Newport-Inglewood, Rose Canyon, and Coronado Bank faults. The closest known active fault zones are the Elsinore (approximately 0.8 mile southwest of the Project site) and San Jacinto (approximately 19 miles northeast of the Project site) fault zones.

Due to the presence of active and inferred faults in proximity to, but outside the boundaries of, the Project site, the Project site is expected to be subject to potentially moderate to severe ground-shaking, as well as some background shaking from other seismically active areas of the Southern California region. The extent of ground shaking associated with an earthquake is dependent upon the size of the earthquake and the geologic material of the underlying area. Therefore, the proposed Project would have the potential to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death as a result of strong seismic ground-shaking.

However, design and construction of the proposed Project must conform with applicable provisions of the 2022 CBC and the City of Lake Elsinore Municipal Code. State law requires the design and construction of new structures comply with current CBC requirements, which address general geologic, seismic (including ground shaking), and soil constraints for new buildings. Additionally, the Geotechnical Evaluation prepared for the proposed Project provided recommendations for the Project's design and construction, including recommendations to ensure conformance with the CBC requirements as codified in Chapter 15.02 (California Building Standards Code) of the City's Municipal Code. Thus, the recommendations meet all applicable requirements and incorporate additional measures exceeding those requirements.

Implementation of **MM GEO-1** would ensure that the proposed Project is constructed in conformance with the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation such that proposed Project development would be safeguarded against the effects of

seismic related activity that may occur on site. With adherence to **MM GEO-1**, potential impacts from seismic ground-shaking would be **less than significant**.

(iii) Seismic-Related Ground Failure, Including Liquefaction;

and

(iv) Landslides.

According to the Geotechnical Evaluation, portions of the Onsite Development Area and Offsite Improvement Area, near Baker Street and Pierce Street, are located within a zone of low to moderate liquefaction potential based on the Riverside County liquefaction zones map. However, the Geotechnical Evaluation determined that, because the Project site would ultimately consist of compacted fill over dense sandy and hard clay materials, which are not considered susceptible to liquefaction, the potential for liquefaction at the Project site is considered very low. Incorporation of **MM GEO-1** would ensure verification testing would occur upon completion of ground improvements to confirm that the compressible soils have been sufficiently densified.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Accordingly, the verification testing required under Mitigation Measure GEO-1 would confirm that the compressible soils have been sufficiently densified to prevent liquefaction. Mitigation Measure GEO-1, while preventing liquefaction, would also prevent lateral spreading.

According to the City of Lake Elsinore General Plan, the State has not yet issued seismic hazards maps for the Lake Elsinore Area. However, the City has mapped areas topographically and has indicated that a substantial portion of Lake Elsinore features slopes of 25 to 35 percent or steeper and therefore is at substantial risk of seismically induced slope failure.[9]

The Restoration Area and majority of the Offsite Improvement Areas of the overall Project site are generally flat. However, the southern and western portions of the Onsite Development Area feature slopes approaching 25 degrees, with elevations in this area ranging between approximately 1,260 feet and 1,400 feet amsl. Accordingly, the Project includes retaining walls along all sides of the Onsite Development Area, including a concrete retaining wall up to 45 feet tall constructed of cement, shotcrete, and ground anchor/soil nail grout along the southwestern boundary of the Onsite Development Area to globally stabilize the slopes south and west of the Project site.

The Geotechnical Evaluation prepared for the proposed Project included a slope stability analysis and determined that the Project site is considered stable.[10] In addition, the Geotechnical Evaluation provided recommendations for the design of the proposed retaining walls to ensure that slopes are

[9] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan. Page 3-15 and Figure 3.5. Adopted December 13.

[10] LGC Geotechnical, Inc. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. Page 13. January 31, 2024.

properly stabilized. As discussed above, **MM GEO-1** requires that the proposed Project be constructed in conformance with the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation. Therefore, with incorporation of **MM GEO-1**, potential impacts related to seismic-related ground failure, including liquefaction, as well as landslides would be **less than significant**.

Threshold 3.7.2: Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant. The 140.04-acre Project site consists of undeveloped land and public road ROWs. Construction activities at the Project site would disturb surface soils and make them susceptible to erosion from wind and water. Potential erosion impacts from Project construction would be reduced through the implementation of a Stormwater Pollution Prevention Plan (SWPPP) and incorporation of best management practices (BMPs) intended to reduce soil erosion pursuant to **RCM WQ-1**, as identified in Section 3.10, Hydrology and Water Quality, and required by the Construction General Permit and Chapter 14.08, Stormwater/Urban Runoff Management and Discharge Controls, of the City's Municipal Code.

As detailed in Section 3.10, Hydrology and Water Quality, development of the proposed Project would increase the impervious surface on the site by 40.1 percent (50.21 acres) and therefore would add impervious surface area that is currently absent from the Project site. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters. However, the impervious surface areas on the Project site would not be prone to on-site erosion or siltation because there would be no exposed soil. The remaining pervious surfaces throughout the Project site would be landscaped or otherwise vegetated [in the Restoration Area], which would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Additionally, the proposed Project would include rip rap wingwalls at the discharge points to prevent soil erosion from stormwater flows and would be required to adhere to **RCM WQ-3**, which requires the preparation of a Project-specific Water Quality Management Plan (WQMP) in compliance with the Riverside County MS4 permit and the implementation of Site Design, Source Control, and LID BMPs that minimize stormwater runoff thereby minimizing on-site erosion and siltation.[11]

Adherence to the BMPs contained in the SWPPP pursuant to **RCM WQ-1** and WQMP pursuant to **RCM WQ-3** would ensure appropriate measures are taken to prevent the substantial loss of topsoil and erosion from occurring during Project construction and operation. Therefore, impacts related to soil erosion would be **less than significant** and mitigation is not required.

Threshold 3.7.3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?

[11] Refer to Section 3.10, Hydrology and Water Quality, for additional information regarding the proposed project's compliance with regulations to reduce potential erosion impacts during project construction and operation.

Less Than Significant with Mitigation Incorporated. As discussed in Section 3.7.3.9 and under Threshold 3.7.1, the potential for liquefaction at the Project site is considered very low, and impacts from any potential for liquefaction would be less than significant with adherence to **MM GEO-1**. Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer. Accordingly, compliance with **MM GEO-1** would ensure verification testing would occur upon completion of ground improvements to confirm that the compressible soils have been sufficiently densified to prevent liquefaction. **MM GEO-1** would prevent liquefaction and would also prevent lateral spreading. Therefore, impacts associated with on- or off-site liquefaction or lateral spreading would be **less than significant with mitigation incorporated**.

The Restoration Area and majority of the Offsite Improvement Areas of the overall Project site are generally flat. However, the southern and western portions of the Onsite Development Area feature slopes approaching 25 degrees, with elevations in this area ranging between approximately 1,260 feet and 1,400 feet amsl. The slope stability analysis performed as part of the Geotechnical Evaluation determined that the Project site is considered stable, and compliance with **MM GEO-1** would ensure impacts related to landslides would be **less than significant.**

The soils underlying the Project site consist of undocumented artificial fill, topsoil, colluvium, and alluvium overlying the bedrock. The soils vary in strength and may be susceptible to subsidence, consolidation, and/or hydrocollapse when additional loads are imposed on those soils by construction equipment and/or proposed on-site structures. Shrinkage, bulking, and subsidence are primarily dependent upon the degree of soil compaction achieved during construction. Variations in the in-situ density of existing soils and the degree to which fill soils are compacted would influence earth volume changes. The Geotechnical Evaluation determined that the undocumented fill, topsoil/colluvium, and upper portion of alluvium are considered potentially compressible and would need to be removed during grading activities until competent formational material is encountered. To provide adequate support for the proposed buildings, the Geotechnical Evaluation included recommendations for required earthwork removals, fill placement, and subgrade reparation, as summarized in **MM GEO-1**.

In order to provide a relatively uniform bearing condition for the planned improvements, the Geotechnical Evaluation recommends the Project site soils be temporarily removed and recompacted as fill. For preliminary planning purposes, estimated removal and recompaction depths for building areas range from approximately 5 to 9 feet below existing grade; however, deeper removal and recompaction may be required during grading as determined by the geotechnical engineer that must conduct verification testing during grading. Within pavement and hardscape areas, temporary removal and recompaction would extend to a depth of at least 2 feet below existing grade or 2 feet below the bottom of the pavement section, whichever is deeper. A compacted fill mat would provide a dense, uniform, high-strength soil layer to distribute the foundation loads over the underlying soils. In addition, in order to provide a uniform fill blanket beneath the proposed buildings, the Geotechnical Evaluation recommends that design cut and cut/fill transition pads be over-excavated a minimum of 4 feet below ultimate finish pad grade, or a minimum of 2-feet below planned footings, whichever is greater. A maximum 2:1 differential fill thickness, up to a maximum over-excavation depth of 15 feet, underneath the industrial buildings should be maintained in order to reduce the potential for future

differential settlement. Mitigation Measure GEO-1 incorporates these soil removal and recompaction recommendations.

As discussed above, the Project would be required to comply with all applicable CBC standards, City standards, and recommendations of the Geotechnical Evaluation pursuant to **MM GEO-1**. With adherence to **MM GEO-1**, soils would be sufficiently compacted and densified during construction to bear the weight of proposed on-site structures, which would stabilize soils and prevent subsidence and/or collapse from occurring on site. Therefore, impacts from subsidence and/or collapse would be **less than significant**.

Threshold 3.7.4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?

Less Than Significant with Mitigation Incorporated. Laboratory test results provided in the Geotechnical Evaluation indicate that soils present on the Onsite Development Area of the Project site should be anticipated to have "Medium" to "High" expansion potential. In consideration of the expansive soils at the Project site, the Geotechnical Evaluation contained preliminary recommendations related to minimum footing depth and slab thickness, minimum slab reinforcement, and slab subgrade options related to presoaking the subgrade and use of nonexpansive soils.

In addition, as discussed above, the Geotechnical Evaluation determined that the undocumented fill, topsoil/colluvium and upper portion of alluvium would need to be removed during grading until competent formational material is encountered. To provide adequate support for the proposed buildings, the Geotechnical Evaluation included recommendations for required earthwork removals, fill placement, and subgrade reparation, as summarized in **Mitigation Measure GEO-1.**

As discussed above, the Project would be required to comply with all applicable CBC standards, City standards, and recommendations of the Geotechnical Evaluation pursuant to **MM GEO-1**. Therefore, adherence to **MM GEO-1** would minimize the potential for expansive soils to create substantial direct or indirect risks to life or property. As such, impacts would be **less than significant**.

Threshold 3.7.5: Would the project 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. Sanitary sewer service at the Project site is provided by Elsinore Valley Municipal Water District (EVMWD). The proposed Project would include the installation of a new EVMWD-operated 8-inch sewer line in the Baker Street ROW from Pierce Street to the west entrance of Building 2. The proposed sewer line would connect to the existing 15-inch sewer line at the intersection of Baker Street and Pierce Street, where it would convey wastewater to the Nichols Lift Station. The proposed Project would connect to the proposed sewer line in Baker Street at two locations. One point of connection is proposed for Building 1, on the east side of the building, and the second point of connection is proposed for Building 2, at the northeast corner of the building.

Because the proposed Project would connect to the municipal wastewater collection system and no septic systems are proposed, **no impact** related to the septic system or alternative wastewater disposal systems would occur. Mitigation is not required.

Threshold 3.7.6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant with Mitigation Incorporated. As previously discussed, the paleontological records search identified no known paleontological localities within the Project site or within 1-mile of the Project site. In addition, no surface manifestation of any paleontological remains was observed within on the Project site or vicinity during the field inspection. However, the Project site lies upon variable alluvial units of Holocene and late Pleistocene origin, as well as some Paleocene-age Silverado Formation. Pleistocene alluvial units are generally paleontologically sensitive, and invertebrate fossils have been recovered from Silverado Formations elsewhere; however, no paleontological resources have been observed or recorded on the Project site or within 1 mile of the Project site.

As stated previously, the majority of the Onsite Development Area and portions of the Offsite Improvements Area along Terra Cotta Road and Pierce Street have a high sensitivity for paleontological resources ("High A") and the area along Collier Avenue as having low sensitivity. The Restoration Area and Construction/Improvements Buffer are located in areas mapped as having low sensitivity for paleontological resources. High sensitivity includes not only the potential for yielding abundant vertebrate fossils, but also for production of a few significant fossils that may provide new and significant data. High A, specifically, is based on formations or deposits that are known to contain, or have the appropriate age and conditions to contain, significant paleontological resources.

Therefore, ground-disturbing activities associated with construction of the proposed Project that may impact undisturbed subsurface sediments have the potential to impact paleontological resources. As such, the proposed Project would include implementation of a paleontological resource mitigation program, as detailed in **MM GEO-2**, during construction of the proposed Project to prevent impacts on significant, nonrenewable paleontological resources and/or reduce impacts to less than significant. With implementation of **MM GEO-2**, potential impacts to previously undiscovered paleontological resources would be **less than significant with mitigation incorporated**.

3.7.7 Level of Significance Prior to Mitigation

Impacts related to geology and soils, including paleontological resources, would be potentially significant without mitigation.

3.7.8 Regulatory Compliance Measures and Mitigation Measures

No regulatory compliance measures are applicable to the proposed Project.

The following mitigation measures would be implemented as part of the proposed Project:

MM GEO-1 **Compliance with California Building Code and Recommendations Provided in Geotechnical Evaluation.** Prior to issuance of grading and/or building permits, the Project Applicant shall provide evidence to the City of Lake

Elsinore (City) for review and approval that the proposed Project site, industrial buildings, all ancillary structures and facilities, and associated infrastructure have been designed and would be constructed in conformance with applicable provisions of the 2022 edition of the California Building Code (CBC), or the most current edition of the CBC in effect at the time the Project Applicant's development application is deemed complete by the City, as codified in Chapter 15.02 (California Building Standards Code) of the City of Lake Elsinore Municipal Code.

Additionally, the Project Applicant shall provide evidence to the City that the recommendations cited in the project-specific Geotechnical Evaluation are incorporated into project plans. Geotechnical recommendations include, but are not limited to, removal of existing vegetation and deleterious materials, utilities, and any other surface and subsurface improvements that would not remain in place for use with the new development, as well as specifications for inclusion of backfill material. Retaining wall design and construction for slope stability shall occur in accordance with site-specific seismic lateral earth pressure increments based on the configuration of the planned retaining wall structures and shall be provided with appropriate drainage and appropriately waterproofed. Updated global slope stability analysis must be performed once soil nail wall plans are in development to verify geologic stability is acceptable. Earthwork, over-excavation, and ground improvement shall occur to depths specified in the Geotechnical Evaluation to provide a sufficient layer of engineered fill or densified soil beneath the structural footings/foundations, including the temporary removal and recompaction of on-site soils as fill, as well as proper surface drainage devices and erosion control.

A California-licensed geotechnical engineer must conduct verification testing of ground improvements to confirm that the compressible soils have been sufficiently densified to a minimum percentage as determined by the Geotechnical Evaluation. Additionally, the geotechnical engineer must determine the ultimate thickness and reinforcement of the building floor slabs based on the imposed slab loading and verify seismic design parameters in accordance with American Society of Civil Engineers (ASCE) 7-16 Section 11.4.8. Additional geotechnical observation and/or testing must be performed by the geotechnical engineer at the following stages:

- During grading (key excavations, removal bottoms, remedial grading, fill placement, etc.);
- Geologic mapping of cut slopes;
- During retaining wall backfill and compaction;
- During utility trench backfill and compaction;

- During precise grading;
- After presoaking building pads and other concrete-flatwork subgrades, and prior to placement of aggregate base or concrete;
- Preparation of pavement subgrade and placement of aggregate base;
- After building and wall footing excavation and prior to placing reinforcement and/or concrete; and
- When any unusual soil conditions are encountered during any grading or construction operation subsequent to issuance of the project-specific Geotechnical Evaluation.

This measure shall be implemented to the satisfaction of the City of Lake Elsinore Director of Building and Safety, or designee.

MM GEO-2 **Paleontological Resources.** Prior to issuance of grading permits, the Project Applicant shall solicit and implement a paleontological resource impact mitigation program during construction of the proposed Project. The mitigation program shall be prepared and implemented in accordance with the provisions of the California Environmental Quality Act (CEQA), as well as the 2010 guidelines of the Society of Vertebrate Paleontology, and shall include, but not be limited to, the following components:

- Earthmoving operations within the project site that may impact paleontologically sensitive soils (which are present on some, but not all, portions of the Project site) shall be monitored by a qualified paleontological monitor. Since the ground surface has been previously disturbed, the monitoring program shall begin with daily "spot-checking" to ensure the timely identification of the previously undisturbed, potentially fossiliferous sediments when they are encountered. Once the depth of 3 feet is reached, or if potentially fossiliferous sediments are exposed sooner, all further earthmoving operations shall be monitored continuously. The monitor shall be prepared to quickly salvage fossils as they are unearthed to avoid construction delays and shall collect samples of sediments that are likely to contain fossil remains of small vertebrates or invertebrates. Additionally, the monitor shall have the power to temporarily halt or divert grading equipment to allow for the removal of abundant or large specimens.
- Samples of potentially fossiliferous sediments shall be collected and processed to look for and recover small fossils that may be present.

- All recovered paleontological specimens shall be identified to the lowest taxon possible and curated at a repository with permanent retrievable storage.

- A report of findings, including an itemized inventory of any recovered specimens, shall be prepared upon completion of paleontological monitoring and sediment/specimen retrieval. The report must 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, will signify completion of the mitigation program.

This measure shall be implemented the satisfaction of the City of Lake Elsinore Community Development Director, or designee.

3.7.9 Level of Significance after Mitigation

Implementation of Mitigation Measure GEO-1 would reduce potentially significant impacts related to geologic hazards and expansive or unstable soils during Project construction by requiring adherence to the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation, while implementation of Mitigation Measure GEO-2 would reduce potentially significant impacts related to significant, nonrenewable paleontological resources by requiring the preparation of a paleontological resource impact mitigation program. As such, with implementation of **MMs GEO-1 and GEO-2**, impacts related to geology and soils, including paleontological resources, would be reduced to less than significant levels.

3.7.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for geology and soils. Typically, cumulative geology and soils impacts are specific to a particular site and there is little, if any, cumulative relationship between the development of a proposed project and development within a larger cumulative area. Moreover, although seismic conditions are regional in nature, seismic impacts on a given project site are site-specific. For example, implementation of the proposed Project would not alter geologic events or soil features/characteristics (such as ground shaking, seismic intensity, or soil expansion or compression). Therefore, the proposed Project would not affect the level of intensity at which a seismic event on an adjacent site is experienced.

Preparation of geotechnical investigation reports and compliance with recommendations in such reports (as required by **MM GEO-1**) would also minimize other geologic hazards, such as landslides, ground subsidence, and expansive soils within the Project site. Implementation of a Stormwater Pollution Prevention Plan (SWPPP) would minimize topsoil erosion by ensuring BMPs are implemented during Project construction. In addition, the proposed Project would convert a majority of existing permeable surfaces within the Onsite Development Area to paved surfaces, which would generally reduce the potential for soil erosion during Project operation. The proposed Project, as with all foreseeable projects within the city, would be required to comply with the applicable State and local requirements, including the CBC and City of Lake Elsinore Building Code in effect at the time of

Project development. Therefore, the proposed Project's contribution to cumulative geotechnical and soil impacts is considered **less than significant**.

Potential impacts of the proposed Project to unknown paleontological resources and unique geologic features, when combined with the impacts of past, present, and reasonably foreseeable projects in the city, could contribute to a cumulatively significant impact due to the overall loss of paleontological resources unique to the region. However, each discretionary development proposal received by the City is required to undergo environmental review pursuant to CEQA. For projects with any potential for significant impacts to paleontological resources or unique geologic features, an investigation would be required to determine the nature and extent of the resources and identify appropriate mitigation measures. When resources are assessed and/or protected as they are discovered, impacts to these resources would be less than significant with mitigation incorporated. As such, adherence to **Mitigation Measure GEO-2**, which requires implementation of a paleontological resources impact mitigation program, would ensure that the proposed Project, together with cumulative projects, would not result in significant cumulative impacts to unique paleontological resources or unique geologic features.

Therefore, when considered in conjunction with past, present, and future projects, impacts pertaining to geology and soils, including paleontological resources, would be **less than cumulatively considerable with** implementation of **MM GEO-1 and GEO-2**.

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3.8 GREENHOUSE GAS EMISSIONS

This section summarizes existing greenhouse gas (GHG) emissions and discusses global climate change, its causes, and the contribution of human activities. This section also estimates the likely GHG emissions that would result from construction and operational activities associated with development of the Baker Street Warehouse Project (proposed Project), including vehicular traffic, energy consumption, and other emission sources. The analysis in this section is based on the findings of the *Baker Lake Elsinore Greenhouse Gas Analysis*[1] prepared for the proposed Project (Appendix H).

3.8.1 Scoping Process

Attendees of the public scoping meeting held on August 1, 2024, expressed a general concern for impacts from GHG emissions that may result from the proposed Project. The City of Lake Elsinore (City) received five comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, that included concerns related to the proposed Project's potential impacts from GHG emissions. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft Environmental Impact Report (EIR). NOP comments related to GHG emissions included comments from the following:

- Armando Veliz, July 5, 2024, expressed concerns regarding traffic congestion and associated GHG emissions.
- Jefrey Ong, July 10, 2024, expressed concerns regarding GHG emissions.
- The California Department of Justice's Bureau of Environmental Justice (Christie Vosburg for Rob Bonta), July 17, 2024, expressed concerns regarding the Project's potential impacts from GHG emissions, recommended that priority be placed on avoiding and/or mitigating land use conflicts and air quality impacts, and provided a document containing best practices and mitigation measures for warehouse projects.
- Briana Sara and Elliot Ruhland, July 19, 2024, expressed concerns regarding GHG emissions.
- The South Coast Air Quality Management District (SCAQMD) (Sam Wang), July 19, 2024, recommended that the Draft EIR include an adequate analysis regarding GHG emissions, utilize the SCAQMD's *CEQA Air Quality Handbook,* and comply with all applicable regulations. In addition, the SCAQMD recommended the Draft EIR consider including provided mitigation measures to reduce GHG impacts.

For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.8.2 Methodology

The proposed Project would result in GHG emissions from construction and operational sources. Construction activities would generate emissions from off-road construction equipment and on roadways as a result of construction-related truck hauling, vendor deliveries, and worker commuting.

[1] Urban Crossroads. 2025. *Baker Lake Elsinore Greenhouse Gas Analysis*. June 3.

Operational GHG emissions are typically associated with mobile sources (e.g., vehicle trips), area sources (e.g., maintenance activities and landscaping), indirect emissions from sources associated with energy consumption (e.g., electricity and natural gas), waste sources (landfilling and waste disposal), and water sources (water supply and conveyance, treatment, and distribution). This analysis uses the California Emissions Estimator Model version 2022.1 (CalEEMod) to quantify GHG emissions for both construction and operation associated with the proposed Project. The proposed Project would be all-electric and would not require the use of natural gas except for use of the on-site cargo-handling equipment within the Onsite Development Area. Use of the on-site cargo-handling equipment was calculated using California Air Resources Board (CARB) Emission FACtors (EMFAC) off-road emission factors. The CalEEMod and EMFAC output is contained in Appendix H. This section has been prepared using methodologies and assumptions recommended in the air quality impact assessment guidelines of the SCAQMD. The CalEEMod modeling outputs for a proposed project are compared to the applicable SCAQMD thresholds to determine if the project would have a potentially significant impact related to GHG emissions. In addition, the proposed project's GHG emissions are compared to appliable plans, policies, and regulations adopted for the purpose of reducing GHG emissions to determine if a conflict could occur.

3.8.3 Existing Environmental Setting

The following section provides background information on GHGs and global climate change.

3.8.3.1 Greenhouse Gases

Global climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans in recent decades. The Earth's average near-surface atmospheric temperature rose 0.6 ± 0.2 degree Celsius (°C) (1.1 ± 0.4 degrees Fahrenheit [°F]) in the 20th century. The prevailing scientific opinion on climate change is that most of the warming observed over the last 50 years is attributable to human activities. The increased amounts of carbon dioxide (CO_2) and other GHGs are the primary causes of the human-induced component of warming. GHGs are released by the burning of fossil fuels, land clearing, agriculture, and other activities, and lead to an increase in the greenhouse effect.[2]

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced global climate change are the following:

- CO_2
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)

[2] The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse allows heat from sunlight in and reduces the heat escaping, GHGs such as CO_2, CH_4, and N_2O in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, although an excess of GHGs results in global warming, the *naturally occurring* greenhouse effect is necessary to keep the planet at a comfortable temperature.

- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Over the last 200 years, humans have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which is believed to be causing global warming. Although man-made GHGs include naturally occurring GHGs such as CO_2, CH_4, and N_2O, some gases, such as HFCs, PFCs, and SF_6, are completely new to the atmosphere.

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation. For the purposes of this analysis, the term "GHGs" will refer collectively only to the six gases listed above.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. The GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of pounds or tons of "CO_2 equivalents" (CO_2e). Table 3.8.A shows the GWP for each type of GHG. For example, SF_6 is 23,900 times more potent at contributing to global warming than CO_2.

Table 3.8.A: Global Warming Potential of Greenhouse Gases

Gas	Atmospheric Lifetime (Years)	Global Warming Potential (100-year Time Horizon)
Carbon Dioxide (CO_2)	50–200	1
Methane (CH_4)	12	21
Nitrous Oxide (N_2O)	114	310
HFC-32	270	11,700
HFC-134a	14	140
HFC-152a	1.4	140
PFC: Tetrafluoromethane (CF_4)	50,000	6,500
PFC: Hexafluoromethane (C_2F_6)	10,000	9,200
Sulfur Hexafluoride (SF_6)	3,200	23,900

Source: Urban Crossroads. *Baker Lake Elsinore Greenhouse Gas Analysis*. Table 2-2. June 3, 2025.
CARB = California Air Resources Board
HFC = hydrofluorocarbon

The following paragraphs summarize the characteristics of the six GHGs.

Carbon Dioxide. In the atmosphere, carbon generally exists in its oxidized form, as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals, and plants; volcanic outgassing;

decomposition of organic matter; and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral production, and deforestation. Natural sources release approximately 150 billion tons of CO_2 each year, far outweighing the 7 billion tons of manmade emissions of CO_2 each year. Nevertheless, natural removal processes, such as photosynthesis by land- and ocean-dwelling plant species, cannot keep pace with this extra input of manmade CO_2, and consequently, the gas is building up in the atmosphere.

In 2022, total annual CO_2 accounted for approximately 81 percent of California's overall GHG emissions.[3] Transportation is the single largest source of CO_2 in California and primarily consists of on-road travel. Electricity production, industrial, and residential sources also make nonnegligble contributions to CO_2 emissions in California.

Methane. CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources include wetlands, termites, and oceans. Decomposition occurring in landfills accounts for the majority of human-generated CH_4 emissions in California and in the United States as a whole. Agricultural processes such as intestinal fermentation, manure management, and rice cultivation are also significant sources of CH_4 in California. Total annual emissions of CH_4 accounted for approximately 9.8 percent of GHG emissions in California in 2022.[4]

Nitrous Oxide. N_2O is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural-source emissions. N_2O is a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion emit N_2O, and the quantity emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in California. N_2O emissions accounted for approximately 3.4 percent of GHG emissions in California in 2022.[5]

Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride. HFCs are primarily used as substitutes for ozone (O_3) depleting substances regulated under the Montréal Protocol, which is an international treaty that was approved on January 1, 1989, and was designated to protect the O_3 layer by phasing out the production of several groups of halogenated hydrocarbons believed to be responsible for O_3 depletion.[6] PFCs and SF_6 are emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in California; however, the rapid

[3] California Air Resources Board. 2024a. A*ssembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 – by Gas*.

[4] Ibid.

[5] Ibid.

[6] United Nations Treaty Collection. n.d. *a Montreal Protocol on Substances that Deplete the Ozone Layer*. Website: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-2-a&chapter=27&clang=_en (accessed August 2025).

growth in the semiconductor industry has led to greater emissions of PFCs. HFCs, PFCs, and SF_6 accounted for about 5.7 percent of GHG emissions in California in 2022.[7]

3.8.3.2 Emissions Inventories

An emissions inventory that identifies and quantifies the primary human-generated sources and sinks of GHGs is a well-recognized and useful tool for addressing climate change. This section summarizes the latest information on global, United States, and California GHG emissions inventories. Under existing conditions, the Project site is vacant; therefore, there are currently no GHG emissions generated within the Project site.

United States Emissions. In 2022, the year for which the most recent data are available, the United States emitted about 6,343.2 million metric tons (MMT) of CO_2e. Overall, emissions in 2022 increased by 0.2 percent compared to the 2021 total GHG emissions. This increase in total GHG emissions was driven by fossil fuel combustion due primarily to economic activity rebounding after the height of the COVID-19 pandemic. However, GHG emissions in 2022 were 16.7 percent below those of 2005 levels. Of the five major sectors—residential and commercial, agricultural, industry, transportation, and electricity generation—transportation accounted for the highest amount of GHG emissions in 2022 (28 percent), with electricity generation second at 25 percent and emissions from industry third at 23 percent.[8]

State of California Emissions. The State emitted approximately 371.1 MMT CO_2e emissions in 2022, 9.3 MMT CO_2e lower than 2021 levels.[9] CARB estimates that transportation was the source of approximately 37.7 percent of the State's GHG emissions in 2022. The next largest sources included industrial sources at approximately 19.6 percent and electricity generation at 16.1 percent. The remaining sources of GHG emissions were commercial and residential activities at 10.6 percent, agriculture at 8.0 percent, and high-GWP activities at 5.7 percent.[10]

City of Lake Elsinore Emissions. The City of Lake Elsinore's *GHG Emissions Inventory Report* was prepared to identify the sources, distribution, and overall magnitude of GHG emissions generated within the city and forecast how emissions would increase under business-as-usual conditions. The report includes a baseline inventory of community-wide emissions for the 2008 year and a business-as-usual forecast for the years 2020 and 2030. The City's GHG inventory is presented in Table 3.8.B, below.

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7 California Air Resources Board. 2024a. A*ssembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 – by Gas*.

8 United States Environmental Protection Agency. 2024. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022.* Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2022 (accessed June 2025).

9 California Air Resources Board. 2024b. *California Greenhouse Gas Emissions for 2000 to 2022, Trends of Emissions and Other Indicators Report*. Website: https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf (accessed June 2025).

10 Ibid.

Table 3.8.B: City of Lake Elsinore Greenhouse Gas Emissions Inventory

Sector	2008 (MT CO_2e)	2020 (MT CO_2e)	2030 (MT CO_2e)
Residential Energy	87,196	189,877	363,175
Commercial Energy	68,461	149,079	285,142
Industrial Energy	8,654	11,639	14,899
Transportation	306,955	636,472	1,217,373
Solid Waste	21,622	47,083	90,056
Recreation	13,839	30,415	58,174
Total	**506,727**	**1,064,565**	**2,028,819**
Service Population (residents + employees)	59,815	143,142	303,237
Emissions per Service Population (MT CO_2e)	**8.5**	**7.4**	**6.7**

Source: City of. Lake Elsinore 2011. *City of Lake Elsinore Climate Action Plan,* Appendix A. December 13. Website: https://www.lake-elsinore.org/DocumentCenter/View/4213/Climate-Action-Plan---Approved-December-13-2011-PDF?bidId= (accessed June 2025).
GHG = greenhouse gas
MT CO_2e = metric tons of carbon dioxide equivalent

3.8.4 Regulatory Setting

The applicable federal, State, regional, and local regulatory framework is discussed below.

3.8.4.1 Federal Regulations

Federal regulations applicable to proposed Project are described below.

Federal Clean Air Act. The United States has historically had a voluntary approach to reducing GHG emissions. However, on April 2, 2007, the United States Supreme Court ruled in *Massachusetts v. E.P.A.* (2007), 549 U.S. 497, that the United States Environmental Protection Agency (USEPA) has the authority to regulate CO_2 emissions of motor vehicles under the federal Clean Air Act (FCAA). Although there currently are no adopted federal regulations for the control or reduction of GHG emissions, the USEPA commenced several actions in 2009 to implement a regulatory approach to global climate change.

This includes the 2009 USEPA final rule for mandatory reporting of GHGs from large GHG emission sources in the United States. Additionally, the USEPA Administrator signed an endangerment finding action in 2009 under the FCAA, finding that six GHGs (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) constitute a threat to public health and welfare, and that the combined emissions from motor vehicles cause and contribute to global climate change, leading to national GHG emission standards.

In October 2012, the USEPA and the National Highway Traffic Safety Administration (NHTSA), on behalf of the United States Department of Transportation, issued final rules to further reduce GHG emissions and improve Corporate Average Fuel Economy (CAFE) standards for light-duty vehicles for model years 2017 and beyond (77 *Federal Register* 62624). The NHTSA's CAFE standards have been enacted under the Energy Policy and Conservation Act since 1978. This national program requires automobile manufacturers to build a single light-duty national fleet that meets all requirements under both federal programs and the standards of California and other states. This program would increase fuel economy

to the equivalent of 54.5 miles per gallon (mpg), limiting vehicle emissions to 163 grams of CO_2 per mile for the fleet of cars and light-duty trucks by model year 2025.

On March 31, 2022, the NHTSA finalized the CAFE standards for Model Years 2024–2026 Passenger Cars and Light Trucks. The amended CAFE standards would require an industry-wide fleet average of approximately 49 mpg for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8 percent annually for model years 2024–2025 and 10 percent annually for model years 2026 and beyond. The final standards are estimated to save about 234 billion gallons of gasoline between model years 2030 and 2050.[11]

SmartWay Program. The SmartWay Program is a public-private initiative among the USEPA, large and small trucking companies, rail carriers, logistics companies, commercial manufacturers, retailers, and other federal and State agencies. Its purpose is to improve fuel efficiency and the environmental performance (reduction of both GHG emissions and air pollution) of the goods movement supply chains. SmartWay consists of four components:

1. **SmartWay Transport Partnership:** A partnership in which freight carriers and shippers commit to benchmarking operations, tracking fuel consumption, and improving performance annually.

2. **SmartWay Technology Program:** A testing, verification, and designation program to help freight companies identify equipment, technologies, and strategies that save fuel and lower emissions.

3. **SmartWay Vehicles:** A program that ranks light-duty cars and small trucks and identifies superior environmental performers with the SmartWay logo.

4. **SmartWay International Interests:** Guidance and resources for countries seeking to develop freight sustainability programs modeled after SmartWay.

SmartWay effectively refers to requirements geared toward reducing fuel consumption. Most large trucking fleets driving newer vehicles are compliant with SmartWay design requirements. Moreover, over time, all heavy-duty trucks (HDTs) will have to comply with CARB GHG regulations that are designed with the SmartWay Program in mind to reduce GHG emissions by making them more fuel efficient.

Through the SmartWay Technology Program, the USEPA has evaluated the fuel-saving benefits of various devices through grants, cooperative agreements, emissions and fuel economy testing, demonstration projects, and technical literature review. As a result, the USEPA has determined the following types of technologies provide fuel-saving and/or emission-reducing benefits when used properly in their designed applications and has verified certain products:

[11] National Highway Traffic Safety Administration. 2022. Corporate Average Fuel Economy Standards for Model Years 2024–2026 Passenger Cars and Light Trucks. May 2. Website: https://www.govinfo.gov/content/pkg/FR-2022-05-02/pdf/2022-07200.pdf (accessed August 2025).

- Idle-reduction technologies, as less idling of the engine when it is not needed would reduce fuel consumption.

- Aerodynamic technologies minimize drag and improve airflow over the entire tractor-trailer vehicle. Aerodynamic technologies include gap fairings that reduce turbulence between the tractor and trailer, side skirts that minimize wind under the trailer, and rear fairings that reduce turbulence and pressure drop at the rear of the trailer.

- Low-rolling-resistance tires can roll longer without slowing down, thereby reducing the amount of fuel used. Rolling resistance (or rolling friction or rolling drag) is the force resisting the motion when a tire rolls on a surface. The wheel will eventually slow down because of this resistance.

- Retrofit technologies include things such as diesel particulate filters, emissions upgrades (to a higher tier), etc., which would reduce emissions.

- Federal excise tax exemptions.

3.8.4.2 State Regulations

CARB is the lead agency for implementing climate change regulations in the State. Since its formation, CARB has worked with the public, the business sector, and local governments to find solutions to California's air pollution problems. Key efforts by the State applicable to the proposed Project are described below.

Assembly Bill 1493 (2002). In response to the transportation sector's significant contribution to California CO_2 emissions, Assembly Bill (AB) 1493 was enacted on July 22, 2002. AB 1493 requires CARB to set GHG emission standards for passenger vehicles and light-duty trucks (and other vehicles whose primary use is noncommercial personal transportation in the State) manufactured in 2009 and all subsequent model years. These standards (starting in model years 2009 to 2016) were approved by CARB in 2004, but the necessary waiver of Clean Air Act Preemption was not granted by the USEPA until June 30, 2009. CARB responded by amending its original regulation, now referred to as Low Emission Vehicle III, to take effect for model years starting in 2017 to 2025. The Trump administration revoked California's waiver in 2019, but the Biden administration restored California's waiver in 2021. The waiver was disapproved again in 2025.

Executive Order S-3-05 (2005). Governor Arnold Schwarzenegger signed Executive Order (EO) S-3-05 on June 1, 2005, which proclaimed that California is vulnerable to the impacts of climate change. To combat those concerns, the EO established California's GHG emissions reduction targets, which established the following goals:

- GHG emissions should be reduced to 2000 levels by 2010.
- GHG emissions should be reduced to 1990 levels by 2020.
- GHG emissions should be reduced to 80 percent below 1990 levels by 2050.

Assembly Bill 32 (2006), California Global Warming Solutions Act. California's major initiative for reducing GHG emissions is AB 32, passed by the State Legislature on August 31, 2006. This initiative

aims at reducing GHG emissions to 1990 levels by 2020. CARB has established the level of GHG emissions in 1990 at 427 MMT CO_2e. The emissions target of 427 MMT CO_2e requires a reduction of 169 MMT CO_2e from the State's projected business-as-usual 2020 emissions of 596 MMT CO_2e. AB 32 requires CARB to prepare a Scoping Plan that outlines the State's main strategies for meeting the 2020 deadline and to reduce GHGs that contribute to global climate change. CARB approved the Scoping Plan on December 11, 2008, which contains the main strategies California will implement to achieve the reduction goals and includes CARB-recommended GHG reductions for each emission sector of the State's GHG inventory.[12]

CARB approved the *First Update to the Climate Change Scoping Plan* (First Update) on May 22, 2014.[13] The First Update identifies opportunities to leverage existing and new funds to further drive GHG emission reductions through strategic planning and targeted low carbon investments. The First Update defines CARB climate change priorities until 2020 and also sets the groundwork to reach long-term goals set forth in EOs S-3-05 and B-16-2012. The update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals as defined in the initial Scoping Plan. It also evaluates how to align the State's "longer-term" GHG reduction strategies with other State policy priorities for water, waste, natural resources, clean energy, transportation, and land use. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by Senate Bill (SB) 32.[14]

The 2022 Scoping Plan[15] was approved in December 2022 and assesses progress toward achieving the SB 32 2030 target and laying out a path to achieve carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. Executive Order B-30-15 (2015). Governor Jerry Brown signed EO B-30-15 on April 29, 2015, which added the following immediate target:

- GHG emissions should be reduced to 40 percent below 1990 levels by 2030.

All State agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the AB 32 Scoping Plan to reflect the 2030 target and therefore is moving forward with the update process. The midterm target is critical to help frame the suite of policy measures,

[12] California Air Resources Board. 2008. *Climate Change Scoping Plan*. December. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf (accessed August 2025).

[13] California Air Resources Board. 2014. *First Update to the Climate Change Scoping Plan*. May. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf (accessed August 2025).

[14] California Air Resources Board. 2017b. *California's 2017 Climate Change Scoping Plan*. November. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf (accessed August 2025).

[15] California Air Resources Board. 2022a. *2022 Scoping Plan*. November 16. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed June 2025).

regulations, planning efforts, and investments in clean technologies and infrastructure needed to continue reducing emissions.

Senate Bill 350 (2015) Clean Energy and Pollution Reduction Act. SB 350, signed by Governor Jerry Brown on October 7, 2015, updates and enhances AB 32 by introducing the following set of objectives in clean energy, clean air, and pollution reduction for 2030:

- Raise California's Renewables Portfolio Standard from 33 percent to 50 percent.
- Increase energy efficiency in buildings by 50 percent by the year 2030.

The 50 percent renewable energy standard will be implemented by the California Public Utilities Commission for private utilities and by the California Energy Commission for municipal utilities. Each utility must submit a procurement plan showing it will purchase clean energy to displace other nonrenewable resources. The 50 percent increase in energy efficiency in buildings must be achieved through the use of existing energy-efficiency retrofit funding and regulatory tools already available to State energy agencies under existing law. The addition made by this legislation requires State energy agencies to plan for and implement those programs in a manner that achieves the energy efficiency target.

Senate Bill 32, California Global Warming Solutions Act of 2016, and Assembly Bill 197. In 2016, the Legislature passed and Governor Brown signed SB 32 and AB 197. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emission reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's April 2015 EO B-30-15. SB 32 builds on AB 32 to keep California on the path toward achieving the State's 2050 objective of reducing emissions to 80 percent below 1990 levels, consistent with an Intergovernmental Panel on Climate Change (the United Nations body for assessing science related to climate change) analysis of the emissions trajectory that would stabilize atmospheric GHG concentrations at 450 parts per million CO_2e and reduce the likelihood of catastrophic impacts from climate change.

The companion bill to SB 32, AB 197 provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions. This additional direction was posted in December 2016 and provides for easier public access to air emissions data that are collected by CARB.

Senate Bill 100. On September 10, 2018, Governor Brown signed SB 100, which raises California's Renewables Portfolio Standard requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. SB 100 also establishes a State policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all State agencies by December 31, 2045. Under SB 100, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Executive Order B-55-18. EO B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." EO B-55-18 directs CARB to work with relevant State agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal to achieve carbon neutrality by 2045 is in addition to other statewide goals, including that not only should

emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279. AB 1279 was signed in September 2022 and codifies the State goals of achieving net carbon neutrality by 2045 and maintaining net negative GHG emissions thereafter. AB 1279 also requires California to reduce statewide GHG emissions by 85 percent compared to 1990 levels by 2045 and directs CARB to work with relevant State agencies to achieve these goals.

Title 24, Building Standards Code and CALGreen Code. In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen), which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. CALGreen addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. CALGreen is updated on a regular basis, with the most recent approved update consisting of the 2022 California Green Building Code Standards that became effective on January 1, 2023. Requirements of the 2022 CALGreen Code that are applicable to the proposed Project include the following:

5.106.4 **Bicycle Parking.** Provide bicycle racks within 200 feet of the visitor's entrance for 5 percent of new visitor motorized vehicle parking spaces, with a minimum of one two-bicycle capacity rack.

5.106.5.3 **Electric Vehicle (EV) Charging.** Provide EV infrastructure and facilitate EV charging in compliance with the California Building Code and the California Electrical Code. The number of EV capable spaces required are specified at approximately 20 percent of the total spaces. Provisions for medium- and heavy-duty EV spaces shall be included.

5.106.12 **Shade Trees.** Shade trees shall be planted to provide shade over 50 percent of the parking area within 15 years unless solar photovoltaic shade structures provide this shade.

5.303.3 **Water Conserving Plumbing Fixtures and Fittings.** All water fixtures shall comply with the California Code of Regulations, Title 20, (Appliance Efficiency Regulations), Section 1605.1 and Title 24, Section 5.303.3 (Water Conserving Plumbing Fixtures and Fittings).

5.304.1 **Outdoor Water Use.** Development shall comply with the City's water efficient landscape ordinance or the current California Department of Water Resources' Model Water Efficient Landscape Ordinance (MWELO), whichever is more stringent.

5.408.1 **Construction Waster Management.** Recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.408.1.2, or 5.408.1.3, or meet

the City's construction and demolition waste management ordinance, whichever is more stringent.

5.410.1 **Recycling by Occupants.** Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, organic waste, and metals, or meet the City's local recycling ordinance, whichever is more restrictive.

Cap and Trade. The development of the Cap-and-Trade Program was included as a key reduction measure of the CARB AB 32 Climate Change Scoping Plan for certain sectors to help California meet its goal of reducing GHG emissions to 1990 levels by 2020 and ultimately achieving an 80 percent reduction from 1990 levels by 2050. The sectors targeted by the Cap-and-Trade Program are electricity generation, petroleum refining, natural gas production and distribution, cement production, and any large industrial facility that emits 25,000 metric tons (MT) CO_2e or more annually. The program went into effect in 2013 and helped California meet its 2020 GHG emissions reduction mandate. The percentage reductions called for under the program would decline over time to help reach the State's 2030 emissions target. Land use projects such as the proposed Project are not directly subject to the Cap-and-Trade Program; however, sectors associated with land use development, such as energy and fuel usage, are deemed covered entities that would indirectly be subject to the program. CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities may buy allowances at auction, purchase allowances from others, or purchase offset credits. The Cap-and-Trade Program does not guarantee GHG emissions reductions in any discrete location or by any particular source, but GHG emissions reductions are only guaranteed on an accumulative basis. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-State or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels, emissions from combustion of other fossil fuels, and the GHG emissions associated with the combustion of transportation fuels in California, whether refined in-State or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary-source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle miles traveled (VMT) are covered in some respect by the Cap-and-Trade Program.

Executive Order N-79-20. EO N-79-20, which Governor Gavin Newsom signed on September 23, 2020, sets the following goals for the State: 100 percent of in-State sales of new passenger cars and trucks shall be zero-emission by 2035; 100 percent of medium- and heavy-duty vehicles in the State shall be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks; and 100 percent of off-road vehicles and equipment in the State shall be zero-emission by 2035, where feasible.

Low Carbon Fuel Standard and Advanced Clean Cars. EO S-01-07 established a low-carbon fuel standard (LCFS) with a statewide goal to be established to reduce the carbon intensity of California's transportation fuels that applies to all refiners, blenders, producers, or importers ("providers") of transportation fuels in California, including fuels used by off-road construction equipment. CARB approved amendments in 2018 to readjust carbon intensity benchmarks to meet California's 2030 GHG reductions targets under SB 32. These amendments include opportunities to promote zero-emission vehicle (ZEV) adoption, carbon capture and sequestration, and advanced technologies for decarbonization of the transportation sector.

Executive Order B-48-18. In January 2018, Governor Brown signed EO B-48-18, requiring all State entities to work with the private sector to have at least 5 million ZEVs on the road by 2030, as well as installing 200 hydrogen fueling stations and 250,000 EV charging stations by 2025. It specifies that 10,000 of the EV charging stations should be direct-current fast chargers. EO B-48-18 also requires all State entities to continue to partner with local and regional governments to streamline the installation of ZEV infrastructure. The Governor's Office of Business and Economic Development is required to publish a Plug-in Charging Station Design Guidebook and update the 2015 Hydrogen Station Permitting Guidebook to aid in these efforts. All State entities are required to participate in updating the 2016 ZEV Action Plan to help expand private investment in ZEV infrastructure, with a focus on serving low-income and disadvantaged communities. Additionally, all State entities are to support and recommend policies and actions to expand ZEV infrastructure at residential land uses, through the LCFS Program, and recommend how to ensure affordability and accessibility for all drivers.

CARB Phase 1 and 2 Heavy-Duty Vehicle GHG Standards. In 2011, the USEPA and NHTSA jointly adopted the first federal GHG emission standards and fuel economy standards for heavy-duty engines and vehicles, referred to as the federal Heavy-Duty GHG Phase 1 regulation (Phase 1). In 2013, CARB adopted the California Phase 1 GHG regulations, which were substantially identical to the federal Phase 1 regulations and included a regulation for GHG emissions from HDTs and engines sold in California. The California Phase 1 standards establish GHG emission limits on truck and engine manufacturers and harmonize with the federal Phase 1 standards for new trucks and engines nationally. Existing heavy-duty vehicle regulations in California include engine criteria emission standards, tractor-trailer GHG requirements to implement SmartWay strategies (i.e., the Heavy-Duty Tractor-Trailer GHG Regulation), and in-use fleet retrofit requirements such as the Truck and Bus Regulation. In 2011, the USEPA adopted its rule for HDTs and engines, which has compliance requirements for new compression and spark ignition engines, as well as Class 2b through Class 8 trucks. Compliance requirements begin with model year 2014, with stringency levels increasing through model year 2018. The rule organizes truck compliance into three groupings, which include: (1) heavy-duty pickups and vans; (2) vocational vehicles; and (3) combination tractors. The USEPA rule does not regulate trailers.

CARB staff has worked jointly with the USEPA and the NHTSA on the next phase of federal GHG emission standards for medium-duty trucks (MDTs) and HDT vehicles, called federal Phase 2. The federal Phase 2 standards built upon the improvements in engine and vehicle efficiency required by the Phase 1 emission standards and represent a significant opportunity to achieve further GHG reductions for 2018 and later-model-year HDT vehicles, including trailers.

In February 2019, the Office of Administrative Law approved the Phase 2 Heavy-Duty Vehicle GHG Standards, which became effective April 1, 2019. The Phase 2 GHG standards are needed to offset projected VMT growth and keep HDT CO_2 emissions declining. The federal Phase 2 standards establish for the first time federal emissions requirements for trailers hauled by heavy-duty tractors. The federal Phase 2 standards are more technology-forcing than the federal Phase 1 standards, requiring manufacturers to improve existing technologies or develop new technologies to meet the standards. The federal Phase 2 standards for new tractors, vocational vehicles, and heavy-duty pickup trucks and vans will be phased in from 2021 to 2027; additionally, for trailers, the standards are phased in from 2018 (2020 in California) through 2027.

The initiatives, EOs, programs, standards, and statutes outlined above comprise the major milestones in California's efforts to address climate change through coordinated action on climate research, GHG mitigation, and climate change adaptation. Numerous other related efforts have been undertaken by State agencies and departments to address specific questions and programmatic needs. The Climate Action Team coordinates these efforts and others, which comprise the California Climate Adaptation Strategy. The California Climate Adaptation Strategy, mandated by AB 1482, links the State's existing and planned climate adaptation efforts, showing how they fit together to achieve California's climate resilience priorities.

3.8.4.3 Regional Regulations

The following regional regulations would be applicable to the proposed Project.

Southern California Association of Governments. On April 4, 2024, SCAG adopted Connect SoCal 2024.[16] In general, the Sustainable Communities Strategy (SCS) outlines a development pattern for the region, which, when integrated with the transportation network and other transportation measures and policies, would reduce VMT from automobiles and light-duty trucks and thereby reduce GHG emissions from these sources. While the SCS does not require that local General Plans, Specific Plans, or zoning be consistent with the SCS, SCAG is required to consider local land use controls when drafting the SCS. For the SCAG region, CARB has set GHG reduction targets at 8 percent below 2005 per-capita emissions levels by 2020, and 19 percent below 2005 per-capita emissions levels by 2035. The 2024–2050 RTP/SCS lays out a strategy for the region to meet these targets. Overall, the SCS is meant to provide growth strategies that will achieve the regional GHG emissions reduction targets. Land use strategies to achieve the region's targets include planning for new growth around high-quality transit areas and livable corridors, and creating neighborhood mobility areas to integrate land use and transportation and plan for more active lifestyles.[17]

The horizon year for Connect SoCal 2024 is 2050 and the plan projects that by 2050, 66 percent of new households and 54 percent of new jobs will be located in Priority Development Areas, either near transit or in walkable communities. The objectives of Connect SoCal 2024[18] are to create a region with:

[16] Southern California Association of Governments (SCAG). 2024. *Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments.* Website: https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (accessed June 2025).

[17] Ibid.

[18] Ibid.

transit as a backbone of the transportation system; more Complete Streets[19] where people and safety are prioritized; policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals; more housing, jobs, and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces; more housing to address the existing housing need as defined by the Regional Housing Needs Assessment (RHNA); and safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero-emission technologies.

South Coast Air Quality Management District. The SCAQMD and SCAG are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the South Coast Air Basin (SCAB). The main purpose of an AQMP is to bring the area into compliance with federal and State air quality standards. The SCAQMD prepares a new AQMP every 3 years, updating the previous plan, and provides a 20-year horizon.

The latest plan is the 2022 AQMP, which was adopted on December 2, 2022[20] and incorporates the latest scientific and technological information and planning assumptions, including the 2020 RTP/SCS and updated emissions inventory methodologies for various source categories which also result in the reduction of GHG emissions.[21] Key elements of the 2022 AQMP pertaining to GHG emissions include:

- Specifically addresses decarbonization and climate policy development and its role in achieving the 2015 O_3 standard.
- Calculation and credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation).
- A strategy with fair-share emission reductions at the federal, State, and local levels.
- Investment in strategies and technologies meeting multiple air quality and climate objectives.
- Identification of new partnerships and significant funding for incentives to accelerate deployment of zero and near-zero technologies.

[19] Complete Streets are roadways designed to support the safety, comfort, and mobility for all road users. They are accessible to people of all ages and abilities, regardless of whether they are driving, walking, bicycling, using micromobility devices, or riding transit/rail (SCAG 2024).

[20] South Coast Air Quality Management District (SCAQMD). 2022. *2022 Air Quality Management Plan*. December. Website: www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan (accessed June 2025).

[21] South Coast Air Quality Management District (SCAQMD). 2022. *2022 Air Quality Management Plan.* Website: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10 (accessed June 2025).

- Attainment of the 1-hour O_3 standard by 2022 with no reliance on "black box" future technology (FCAA Section 182(e)(5) measures).[22] While not directly correlated to GHG emissions, the measures rely heavily on zero-emission technologies that will also significantly reduce GHG emissions.

The SCAQMD adopts rules and regulations to implement portions of the AQMP. Several of these rules may apply to Project construction or operations affecting the reduction of GHG emissions.

Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate new development projects within the SCAB, such as the proposed Project. Instead, the SCAQMD published the *CEQA Air Quality Handbook* to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential GHG and air quality impacts of projects proposed in the SCAB.[23] The *CEQA Air Quality Handbook* provides standards, methodologies, and procedures that can be used in conducting GHG analyses in EIRs and were used extensively in the preparation of this analysis. The SCAQMD is currently in the process of replacing the *CEQA Air Quality Handbook* with the *Air Quality Analysis Guidance Handbook*.[24]

While the replacement *Air Quality Analysis Guidance Handbook* is being updated, supplemental guidance/information on the SCAQMD website includes: (1) EMFAC on-road vehicle air pollutant and GHG emission factors; (2) GHG analysis guidance; (3) mitigation measures and control efficiencies; (4) off-road mobile source air pollutant and GHG emission factors; and (5) updated SCAQMD Air Quality Significance Thresholds. The SCAQMD also recommends using approved models to calculate emissions from land use projects, such as CalEEMod. These recommendations were followed in the preparation of this analysis.

The following SCAQMD rules and regulations would apply to the proposed Project:

- SCAQMD Rule 403 requires projects to incorporate fugitive dust control measures.

- SCAQMD Rule 1113 limits the VOC content of architectural coatings.

- SCAQMD Rule 2305, the Warehouse Indirect Source Rule, requires the owners and operators of warehouses greater than 100,000 square feet to directly reduce NO_X and particulate matter emissions, or to otherwise facilitate emission and exposure reductions of these pollutants in nearby communities. The warehouse rule is a menu-based points system requiring warehouse operators to annually earn a specified number of points. These points can be earned by completing actions from a menu that can include acquiring and using natural gas, near-zero

[22] FCAA Section 182(e)(5) (42 U.S.C. § 7511a(e)(5)) allows "extreme" nonattainment areas to rely on the adoption of "new technologies" in their attainment demonstrations, with the expectation that new or improved control technologies will materialize. These measures are commonly referred to as "black box" measures because they are not defined specifically at the time of plan development. See https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/black-box_final.pdf?sfvrsn=4 (accessed June 2025).

[23] South Coast Air Quality Management District (SCAQMD). *Air Quality Analysis Handbook.* Website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook (accessed June 2025).

[24] Ibid.

emissions and/or zero-emissions on-road trucks, zero-emissions cargo-handling equipment, solar panels or zero-emissions charging and fueling infrastructure, or other options. The SCAQMD expects this rule to reduce emissions from warehouse uses by 10 to 15 percent.

In 2008, the SCAQMD formed a Working Group to identify GHG emissions thresholds for land use projects that could be used by local lead agencies in the SCAB. The Working Group developed several different options that are contained in the SCAQMD 2008 draft guidance document titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans*[25] and that could be applied by lead agencies. On September 28, 2010, SCAQMD Working Group Meeting #15 provided further guidance, including a tiered approach for evaluating GHG emissions for development projects where the SCAQMD is not the lead agency. The SCAQMD's GHG emissions thresholds are in draft form as the SCAQMD has not presented a finalized version of these thresholds to the governing board.

The SCAQMD identifies a per-capita efficiency target for which a project would not be expected to substantially conflict with any State legislation adopted to reduce statewide GHG emissions based on the AB 32 GHG reduction target and 2020 emissions inventory prepared for the CARB's 2008 Scoping Plan. As such, the utilization of a service population represents the rates of emissions needed to achieve a fair share of the State's mandated emissions reductions. Overall, the SCAQMD identifies a GHG efficiency level that, when applied statewide or to a defined geographic area, would meet the post-2020 emissions targets as required by AB 32 and SB 32. If projects achieve targeted rates of emissions per the service population, the State will be able to accommodate expected population growth and achieve economic development objectives while also abiding by AB 32's emissions target and future post-2020 targets.

3.8.4.4 Local Regulations

Good Neighbor Policy. The City of Lake Elsinore adopted the Good Neighbor Policy for Logistics and Warehouse/Distribution Uses (Policy Number 400-16) on April 25, 2023. The goal of this policy is to provide a framework through which large-scale logistics and warehouse projects can be designed and operated in a way that lessens any impacts on surrounding communities and the environment. The guidelines require the following standards to be implemented for warehousing facilities within the city:

- All construction and grading related activities shall comply with the SCAQMD Regulations in effect at the time work commences.
- The following environmentally responsible practices shall be required during construction:
    - The highest-rated CARB tier of construction equipment available shall be utilized.

[25] South Coast Air Quality Management District (SCAQMD). 2008. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.* Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf (accessed August 2025).

- Electric-powered hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors shall be used.

- Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge if the utility provider can provide temporary power for this purpose.

- Identification in site plans of a location for future electric truck charging stations and installation of a conduit to that location.

- A Property Maintenance Program shall be submitted for review and approval by the Community Development Director, or designee, prior to the issuance of building permits. The program shall provide for the regular maintenance of building structures, landscaping, and paved surfaces in good physical condition, and appearance. The methods and maximum intervals for maintenance of each component shall be specified in the program.

- Facility operators shall coordinate with CARB and the SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.

- The Project Applicant shall place a weatherproof sign at the entrance to the Project site identifying the approved days and hours of construction activity and install signage that clearly identifies the contact information of the development manager.

- Facility hours of business operation for projects with buildings located within 1,000 feet of a sensitive receptor shall be reviewed on a project-by-project basis. At no time shall refrigerated trucks parked outdoors run and/or idle outside of the facility hours of operation. Changes to the hours of operation shall be reviewed on a project-by-project basis and shall be included in the Conditions of Approval for the Project.

- A City representative shall conduct periodic on-site inspections during and after construction to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities.

City of Lake Elsinore Climate Action Plan. The City of Lake Elsinore Climate Action Plan (CAP),[26] adopted in 2011, is a long-range plan to reduce community-wide GHG emissions. The CAP is designed to:

- Benchmark Lake Elsinore's existing (2008) GHG emissions and projected emissions relative to statewide emissions targets.

[26] City of Lake Elsinore. 2011. *City of Lake Elsinore Climate Action Plan.* December 13. Website: https://www.lake-elsinore.org/DocumentCenter/View/4213/Climate-Action-Plan---Approved-December-13-2011-PDF?bidId= (accessed June 2025).

- Establish GHG emissions reduction strategies and measures to reduce the City's proportionate share of emissions to meet the statewide targets identified in AB 32 and EO 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 CEQA and AB 32 and EO S-3-05). The *CEQA Guidelines* allow 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), 15130(c)).

- Serve as the programmatic tiering document for the purposes of CEQA within the city of Lake Elsinore for GHG emissions, by which 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 City's CAP is designed to streamline the environmental review of future development projects in the city consistent with *State CEQA Guidelines* Section 15183.5(b). However, the City's CAP identifies emission reduction goals to reduce GHG emissions in Lake Elsinore by 15 percent below the 2005 emissions levels by 2020, consistent with AB 32. Because the City's CAP was prepared based on the 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32, the City's CAP would not be applicable for CEQA streamlining. However, the CAP sets forth goals, measures, and actions to achieve emission reductions; therefore, a qualitative analysis of the proposed Project's consistency with the CAP has been conducted.

3.8.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Guidelines* Based on these thresholds, implementation of the proposed Project would have a significant adverse impact related to global climate change if it would:

Threshold 3.8.1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or

Threshold 3.8.2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases.

CEQA Guidelines Section 15064.4(a) provides that the "determination of the significance of greenhouse gas emissions calls for careful judgment on the part of the lead agency consistent with the provisions in section 15064." Section 15064(b) provides that such determinations be "based to the extent possible on scientific and factual data" and, further, states that an "ironclad definition of significant effect is not always possible because the significance of an activity may vary with the

setting." The effects of GHG emissions are cumulative and are analyzed in the context of CEQA's requirements for cumulative impact analysis.

Currently, there is no statewide GHG emissions threshold that has been used to determine the potential GHG emissions impacts of a project. Threshold methodology and thresholds are still being developed and revised by air districts in California. Therefore, as described below, the City elected to utilize a numeric threshold of significance it selected for the proposed Project based on substantial evidence.

To provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents, SCAQMD convened a GHG CEQA Significance Threshold Working Group (Working Group) in 2008. This Working Group proposed a tiered approach for evaluating GHG emissions for development projects where SCAQMD is not the lead agency. The applicable tier for this Project is Tier 3, which states that if GHG emissions are less than 3,000 MT CO_2e per year, project-level and cumulative GHG emissions would be less than significant. This 3,000 MT CO_2e per year threshold is based on a 90 percent emission "capture" rate methodology. Prior to its use by the SCAQMD in the unapproved thresholds, the 90 percent emissions capture approach was one of the options suggested by the California Air Pollution Control Officers Association (CAPCOA) in its *CEQA & Climate Change* white paper.[27] A 90 percent emissions capture rate means that unmitigated GHG emissions from the top 90 percent of all GHG-producing projects within a geographic area—the SCAB in this instance—would be subject to a detailed analysis of potential environmental impacts from GHG emissions, while the bottom 10 percent of all GHG-producing projects would be excluded from detailed analysis. A GHG significance threshold based on a 90 percent emissions capture rate is appropriate to address the long-term adverse impacts associated with global climate change because medium and large projects will be required to implement measures to reduce GHG emissions, while small projects, which are generally infill development projects that are not the focus of the State's GHG reduction targets, are allowed to proceed. Further, a 90 percent emissions capture rate sets the emission threshold low enough to capture a substantial proportion of future development projects and demonstrate that cumulative emissions reductions are being achieved while setting the emission threshold high enough to exclude small projects that will, in aggregate, contribute approximately 1 percent of projected statewide GHG emissions in the year 2050.[28]

The 3,000 MT CO_2e per year threshold was proposed by SCAQMD a decade ago and was adopted as an interim policy. No permanent, superseding policy or threshold has since been adopted. However, the 3,000 MT CO_2e per year threshold was developed and recommended by the SCAQMD, an expert agency, based on substantial evidence as provided in the *Draft Guidance Document – Interim CEQA Greenhouse Gas Significance Threshold* document and subsequent Working Group meetings (the latest of which occurred in 2010). The SCAQMD has not withdrawn its support of the interim threshold, and all documentation supporting the interim threshold remains on the SCAQMD website on a page that provides guidance to CEQA practitioners for air quality analysis (and where all SCAQMD

[27] South Coast Air Quality Management District (SCAQMD). *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.* 2008. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf (accessed August 2025).

[28] Ibid.

significance thresholds for regional and local criteria pollutants and toxic air contaminants also are listed). Further, as stated by the SCAQMD, this threshold "uses the Executive Order S-3-05 goal [80 percent below 1990 levels by 2050] as the basis for deriving the screening level" and, thus, remains valid for use in 2025. Lastly, this threshold has been used for hundreds, if not thousands, of GHG analyses performed for projects located within the SCAQMD's jurisdiction. As such, use of the 3,000 MT CO_2e per year threshold is a conservative approach.

Thus, for purposes of analysis in this EIR, if Project-related GHG emissions do not exceed the 3,000 MT CO_2e per year threshold, then Project-related GHG emissions would have a less than significant impact.

3.8.6 Project Impacts

Threshold 3.8.1: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Significant and Unavoidable Impact. This section discusses the proposed Project's impacts related to the release of GHG emissions for the construction and operational phases of the proposed Project.

Construction and operation of the proposed Project would generate GHG emissions, with the majority of energy consumption (and associated generation of GHG emissions) occurring during the Project's operation.

Overall, the following activities associated with the proposed Project could directly or indirectly contribute to the generation of GHG emissions.

Construction. Construction activities associated with the proposed Project would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. Furthermore, CH_4 is emitted during the fueling of heavy equipment. Exhaust emissions from construction activities would vary daily as construction activity levels change.

Neither the City nor the SCAQMD provides a separate GHG significance threshold for construction emissions; rather, the SCAQMD provides guidance, titled *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules, and Plans,* specifying that construction emissions should be amortized over 30 years (considered a typical project lifetime) and added to a project's operational emissions, with that total compared to the GHG significance threshold.[29]

Construction emissions were estimated for the proposed Project using CalEEMod. As described in Section 3.3, Air Quality, this analysis assumes that construction of the proposed Project is expected to commence in April 2026 and would last through August 2027 for Project build out of the Onsite

[29] South Coast Air Quality Management District (SCAQMD). *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.* 2008. Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf (accessed August 2025).

Development Area and to begin in September 2025 and last through May 2027 for the off-site/lift station improvements within the Offsite Improvements Area. It is anticipated that Project build out would require the off-haul of approximately 2,336 square feet of existing structures and the export of approximately 50,000 cubic yards of earthwork, which was included in CalEEMod. Consistent with the City's Good Neighbor Policy for Logistics and Warehouse/Distribution uses, this analysis assumes use of Tier 4 Interim construction equipment. The number of worker and hauling trips assumed in CalEEMod is based on default assumptions; however, CalEEMod only assigns vendor trips to the building construction phase. Vendor trips would likely occur during all phases of construction; as such, vendor trips in CalEEMod were adjusted based on a ratio of the total vendor trips to the number of days of each subphase of activity. Additionally, because paving and architectural coating activities overlap with building construction, the vendor trips assigned to building construction activities are assumed to be the same trips used to cover paving and architectural coating. All other construction details are not yet known; therefore, CalEEMod default assumptions[30] (e.g., construction worker and truck trips and fleet activities) were used. Construction-related emissions are presented in Table 3.8.C. CalEEMod output sheets are included in Appendix H.

As shown in Table 3.8.C, below, using CalEEMod, it is estimated that the proposed Project would generate 2,789.04 MT CO_2e during construction. When amortized over the 30-year life of the Project, annual emissions would be 92.97 MT CO_2e. Pursuant to the SCAQMD methodology, amortized emissions were added to the operational emissions as described below.

Table 3.8.C: Construction Greenhouse Gas Emissions

Year	CO_2	CH_4	N_2O	Refrigerants	CO_2e
2025	96.11	0.00	0.00	0.00	96.45
2026	1,558.71	0.05	0.09	1.05	1,588.23
2027	1,084.58	0.03	0.06	0.92	1,104.36
Total	**2,739.41**	**0.08**	**0.15**	**1.98**	**2,789.04**
Amortized Construction Emissions	91.31	<0.01	0.01	0.07	92.97

Source: Urban Crossroads, *Baker Lake Elsinore Greenhouse Gas Analysis*, Table 3-3 (June 3, 2025).
Note: The total construction GHG emissions are amortized over the 30-year life of the Project.
CH_4 = methane
CO_2 = carbon dioxide
MT = metric tons
MT CO_2e = metric tons of carbon dioxide equivalent
N_2O = nitrous oxide

Operational Emissions. Long-term GHG emission impacts are those associated with mobile-source emissions (e.g., vehicle and truck trips), energy-source emissions (e.g., natural gas), area-source emissions (e.g., architectural coatings and the use of landscape maintenance equipment), indirect emissions from sources associated with energy consumption, waste sources (landfilling and waste disposal), water sources (water supply and conveyance, treatment, and distribution), on-site cargo-handling equipment emissions, stationary-source emissions (use of diesel-powered

[30] According to the *CalEEMod User Guide,* default assumptions in CalEEMod utilize widely accepted methodologies for estimating emissions that can be used when site-specific information is not available. Sources of these methodologies and default data include, but are not limited to, the USEPA AP-42 emission factors, CARB vehicle emission models, and studies commissioned by the CEC and CalRecycle.

emergency generators), and transportation refrigeration units (TRUs) related to the proposed Project.

The proposed Project would generate emissions from daily operations that would include heavy-duty truck trips from warehouse operations. The *Scoping Agreement for Traffic Impact Study*[31]determined that the proposed Project would generate a total of 2,384 total trips per weekday, consisting of 1,400 passenger car trips and 984 truck trips.[32] In addition, the proposed Project is expected to generate approximately 295 total trips (including 182 passenger car trips and 113 truck trips) on Saturday and approximately 152 total trips (including 96 passenger car trips and 56 truck trips) on Sunday.

As the distances the warehouse haul trucks would travel is unknown, consistent with SCAQMD-recommended truck trip lengths, it was conservatively assumed that the average trip length would be 15.3 miles for 2-axle trucks, 14.2 miles for 3-axle trucks, and 40 miles for 4+-axle trucks. Weighing the average trip lengths using traffic trip percentages taken from the *Scoping Agreement for Traffic Impact Study*, the trip length function for the proposed uses was assumed to be 28.54 miles for the high-cube cold storage and high-cube fulfillment warehouse uses and 30.47 miles for the manufacturing use, with an assumption of 100 percent primary trips.

Energy-source emissions would be generated at off-site utility providers as a result of increased electricity demand generated by the Project. The proposed Project would be designed to comply with the water efficiency and energy conservation requirements included in the California Building Standards Code (California Code of Regulations [CCR] Title 24).

Area-source emissions would be associated with architectural coatings, consumer products, and landscaping equipment. Waste-source emissions generated by the proposed Project include energy generated by landfilling and other methods of disposal related to transporting and managing Project-generated waste. In addition, water-source emissions associated with the proposed Project are generated by water supply and conveyance, water treatment, water distribution, and wastewater treatment.

In addition, the proposed Project would result in on-site cargo-handling equipment emissions emanating from the Onsite Development Area. For this Project, the on-site modeled operational equipment includes up to four 175-horsepower (hp), natural gas-powered cargo-handling equipment, including a port tractor operating 4 hours per day, 365 days per year. The estimated on-site cargo-handling equipment emissions for the equipment described above were calculated off-model using EMFAC offroad emission factors and the activity assumptions described above (as detailed in Appendix C-1).

The proposed Project was also conservatively assumed to include installation of two 300 hp diesel-powered emergency generators at the industrial buildings and one 350 hp diesel-powered emergency generator at the off-site lift station. The emergency generators were estimated to

31 EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

32 Urban Crossroads. 2025. *Baker Lake Elsinore Greenhouse Gas Analysis*. June 3. Page 50.

operate up to 1 hour per day, 1 day per week, up to 50 hours per year, for maintenance and testing purposes. Emissions associated with the stationary diesel-powered emergency generators were calculated using CalEEMod.

In order to account for the possibility of refrigerated uses, trucks associated with the cold-storage land use are assumed to also have TRUs. Therefore, for modeling purposes, 48 one-way truck trips have the potential to include TRUs. TRUs are accounted for during on-site and off-site travel. The TRU calculations are based on the EMFAC OFFROAD Emissions, developed by CARB. EMFAC does not provide emission rates per hour or mile as with the on-road emission model and only provides emissions inventories. Emission results are produced in tons per day, while all activity, fuel consumption, and horsepower hours were reported at annual levels. The emissions inventory is based on specific assumptions, including the average horsepower rating of specific types of equipment and the hours of operation annually. The emissions inventory was converted into emission rates to calculate GHG emissions from TRU operation.

As shown in Table 3.8.D, the proposed Project would generate 14,656.35 MT CO_2e per year, which would exceed the City's preferred 3,000 MT CO_2e per year threshold. As such, operation of the proposed Project would result in a significant impact for GHG emissions and mitigation would be required. Implementation of **Mitigation Measure (MM) AQ-1** through **MM AQ-6**, **Project Design Feature (PDF) AQ-1** through **PDF AQ-5**, and **MM GHG-1** through **MM GHG-3** would be required to reduce GHG emissions from the proposed Project to the extent feasible. Although these mitigation measures would reduce GHG emissions generated during operational activities associated with the proposed Project, these measures would provide emissions reductions that are not quantifiable. **MM AQ-1** through **MM AQ-6** and **PDF AQ-1** through **PDF AQ-5** include measures to reduce truck and other operational emissions to the extent feasible. In addition, trucks on site are required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated emissions. **MM GHG-1** requires that the Project provide 60 percent diversion of waste from the site, **MM GHG-2** requires the incorporation of drought-tolerant landscaping, and **MM GHG-3** requires energy-efficient building designs, which would reduce GHG emissions related to waste, water, and energy sources, respectively.

With implementation of **MM AQ-1** through **MM AQ-6**, **PDF AQ-1** through **PDF AQ-5**, and **MM GHG-1** through **MM GHG-3**, and the regulations implemented by the USEPA and CARB to improve truck efficiency, the long-term operational emissions associated with the proposed Project would continue to exceed the City's preferred 3,000 MT CO_2e per year significance threshold. The majority of the Project's operational-source emissions are generated by passenger cars and trucks accessing the Project. Neither the Project Applicant nor the City have regulatory authority to control tailpipe emissions. Therefore, operation of the proposed Project would result in a significant impact related to GHG emissions. Impacts would be **significant and unavoidable**.

Table 3.8.D: Project Greenhouse Gas Emissions

Emission Source	Pollutant Emissions (MT per year)				
	CO_2	CH_4	N_2O	Refrigerants	CO_2e
Construction Emissions Amortized over 30 Years					92.97
Operational Emissions					
Mobile Source	11,446.58	0.23	1.33	15.41	11,863.46
Area Source	20.30	0.00	0.00	0.00	20.37
Energy Source	1,117.72	0.11	0.01	0.00	1,124.23
Water Source	332.59	7.55	0.18	0.00	575.64
Waste Source	86.62	8.66	0.00	0.00	303.07
Refrigerants	0.00	0.00	0.00	18.50	18.50
Stationary	18.09	0.00	0.00	0.00	18.15
TRUs	0.00	0.00	0.00	0.00	450.49
On-Site Cargo Equipment	0.00	0.00	0.00	0.00	189.47
Total Project GHG Emissions					**14,656.35**
Threshold					**3,000**
Emissions Exceed Threshold?					**Yes**

Source: Urban Crossroads, *Baker Lake Elsinore Greenhouse Gas Analysis*, Table 3-6 (June 3, 2025).
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
GHG = greenhouse gas
MT = metric tons
MT CO_2e = metric tons of carbon dioxide equivalent
N_2O = nitrous oxide
TRU = transportation refrigeration unit

Threshold 3.8.2: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?

Significant and Unavoidable Impact. An evaluation of the proposed Project's consistency with the 2022 Scoping Plan, the 2024–2050 RTP/SCS, and the City's CAP is provided below.

2022 Scoping Plan. The following discussion evaluates the proposed Project according to the goals of the 2022 Scoping Plan, EO B-30-15, SB 32, and AB 197.

EO B-30-15 added the immediate target of reducing GHG emissions to 40 percent below 1990 levels by 2030. CARB released a second update to the Scoping Plan, the 2017 Scoping Plan, to reflect the 2030 target set by EO B-30-15 and codified by SB 32. SB 32 affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in EO B-30-15. SB 32 builds on AB 32 and keeps the State on the path toward achieving its 2050 objective of reducing emissions to 80 percent below 1990 levels. The companion bill to SB 32, AB 197, provides additional direction to CARB related to the adoption of strategies to reduce GHG emissions.

The 2022 Scoping Plan assesses progress toward the statutory 2030 target while laying out a path to achieving carbon neutrality no later than 2045. The 2022 Scoping Plan focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

The 2022 Scoping Plan focuses on building clean energy production and distribution infrastructure for a carbon-neutral future, including transitioning existing energy production and transmission infrastructure to produce zero-carbon electricity and hydrogen, and utilizing biogas resulting from wildfire management or landfill and dairy operations, among other substitutes. The 2022 Scoping Plan states that in almost all sectors, electrification will play an important role. The 2022 Scoping Plan evaluates clean energy and technology options and the transition away from fossil fuels, including adding four times the solar and wind capacity by 2045 and about 1,700 times the amount of current hydrogen supply. As discussed in the 2022 Scoping Plan, EO N-79-20 requires that all new passenger vehicles sold in California will be zero-emission by 2035 and all other fleets will have transitioned to zero-emission as fully possible by 2045, which will reduce the percentage of fossil fuel-combustion vehicles.

The 2022 Scoping Plan includes three priority areas to reduce GHG emissions that would apply to all land use development projects. More specifically, the three priority areas include: (1) transportation electrification, (2) VMT reduction, and (3) building decarbonization. The proposed Project's consistency with these three priority areas is evaluated below.

Transportation Electrification. The proposed Project would include EV charging infrastructure that, at minimum, would meet the Tier 2 Nonresidential Voluntary Measures of CALGreen Section A5.106.5.3.2. The proposed Project is designed to include 24 EV charging spaces installed and operational upon completion, with infrastructure in place to accommodate an additional 69 EV charging spaces for future use. Therefore, the proposed Project would not conflict with this priority area.

VMT Reduction. As noted in the *Vehicle Miles Traveled (VMT) Screening Analysis Memorandum,*[33] the proposed Project is located in a low-VMT area. Therefore, the Project is screened out of the VMT analysis, and impacts are expected to be less than significant. As such, the proposed Project would not conflict with this priority area.

Building Decarbonization. The proposed Project would be all-electric and would not require the use of natural gas except for use of the on-site cargo-handling equipment within the Onsite Development Area. As such, the proposed Project would use all-electric appliances without any natural gas connections and would not include the use of propane or other fossils fuels for space heating, water heating, or indoor cooking. Additionally, per Title 24 requirements, the proposed Project would be required to incorporate solar for the office portion of the building. As such, the proposed Project would not conflict with this priority area.

As demonstrated above, the proposed Project would not impede the State's progress toward carbon neutrality by 2045 under the 2022 Scoping Plan. The proposed Project would be required to comply with applicable current and future regulatory requirements promulgated through the 2022 Scoping Plan. Some of the current transportation sector policies the proposed Project would comply with (through vehicle manufacturer compliance) include: Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer Rule, the Clean Construction Program, the In-use Off-Road

[33] EPD Solutions, Inc. 2024. Baker *Lake Elsinore Vehicle Miles Traveled (VMT) Screening Analysis Memorandum.*

Diesel-Fueled Fleets Regulation, the Off-Road Zero-Emission Targeted Manufacturer Rule, Amendments to the In-use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the LCFS. In addition, the proposed Project would be required to comply with applicable elements outlined in the Good Neighbor Guidelines. As such, the proposed Project would be consistent with the 2022 Scoping Plan.

2024–2050 Regional Transportation Plan/Sustainable Communities Strategy. SCAG's 2024–2050 RTP/SCS identifies that land use strategies that focus on new housing and job growth in areas served by high-quality transit and other opportunity areas would be consistent with a land use development pattern that supports and complements the proposed transportation network. The core vision in the 2024–2050 RTP/SCS is to better manage the existing transportation system through design management strategies, integrate land use decisions and technological advancements, create Complete Streets that are safe to all roadway users, preserve the transportation system, and expand transit and foster development in transit-oriented communities. The 2024–2050 RTP/SCS contains transportation projects to help more efficiently distribute population, housing, and employment growth, as well as forecast development that is generally consistent with regional-level general plan data. The forecasted development pattern, when integrated with the financially constrained transportation investments identified in the 2024–2050 RTP/SCS, would reach the GHG emissions reduction target set by CARB, including the regional target of reducing GHG emissions from automobiles and light-duty trucks by 19 percent by 2035 (compared to 2005 levels). The 2024–2050 RTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the 2024–2050 RTP/SCS, but it provides incentives for consistency for governments and developers.

The objectives of the 2024–2050 RTP/SCS are to create a region with: transit as a backbone of the transportation system; more Complete Streets where people and safety are prioritized; policies that encourage emerging technologies and mobility innovations that support rather than hamper regional goals; more housing, jobs, and mobility options closer together in Priority Development Areas to preserve natural lands and open spaces; more housing to address the existing housing need as defined by the RHNA; and safe and fluid movement of goods, with a commitment to the broad deployment of zero- and near-zero emission technologies.

The proposed Project would increase regional employment. According to SCAG's 2024–2050 RTP/SCS, employment within the city in 2019 is approximately 16,700 jobs with an anticipated increase to approximately 22,700 jobs by 2050, a growth of approximately 6,000 jobs. [34]

The 2024–2050 RTP/SCS encompasses more than 4,000 transportation projects, including highway upgrades, railroad grade separations, new bicycle lanes, transit hubs, and bridge replacements. These projects, outlined in plans from the six county transportation commissions, aim to alleviate traffic congestion, enhance the efficiency of the region's infrastructure, and expand transportation

[34] Southern California Association of Governments. 2024. *Connect SoCal 2024 Demographics & Growth Forecast.* Website: https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed June 2025).

options for all residents. As a key planning document for the region, the 2024–2050 RTP/SCS enables project sponsors to access federal funding.

The plan also incorporates operations and maintenance costs to ensure long-term reliability, sustainability, and cost-effectiveness. In addition, the 2024–2050 RTP/SCS is supported by various transportation and land use strategies that contribute to the region's ability to meet State GHG emissions reduction targets and comply with FCAA regulations. These strategies also aim to preserve open spaces, promote public health and road safety, support the essential goods movement sector, improve resource efficiency, and address the jobs/housing imbalance in the Inland Empire area.

The City of Lake Elsinore General Plan Land Use designation of the Project site is Limited Industrial, which is consistent with the land use designation assumed by both the 2020–2045 RTP/SCS and the 2024–2050 RTP/SCS. In addition, the proposed Project represents a nominal percentage of the anticipated increase in jobs and therefore would not result in long-term operational employment growth that exceeds planned growth projections in the 2024–2050 RTP/SCS or result in employment growth that would substantially add to traffic congestion. As such, the proposed Project would be consistent with the SCAG's 2024–2050 RTP/SCS.

City of Lake Elsinore Climate Action Plan. As discussed above, the City adopted a CAP in 2011 to reduce community-wide GHG emissions. The City's CAP is designed to streamline environmental review of future development projects in the city consistent with *State CEQA Guidelines* Section 15183.5(b). However, the City's CAP identifies emission reduction goals to reduce GHG emissions in Lake Elsinore by 15 percent below the 2005 emissions levels by 2020, consistent with AB 32. Because the City's CAP was prepared based on the 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32, the City's CAP would not be applicable for CEQA streamlining. However, the CAP sets forth goals, measures, and actions to achieve emission reductions; therefore, a qualitative analysis of the proposed Project's consistency with the CAP is provided in Table 3.8.E.

Although the proposed Project would be consistent with the applicable measures and goals from the 2022 Scoping Plan, 2024–2050 RTP/SCS, and the City's CAP, the proposed Project would result in a significant and unavoidable impact because its operational GHG emissions would exceed the City's preferred threshold of significance. As such, the proposed Project would not comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in the 2022 Scoping Plan, EO B-30-15, and AB 197 and would not be consistent with applicable State plans and programs designed to reduce GHG emissions. Therefore, the proposed Project would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs. Impacts would be **significant and unavoidable**.

Table 3.8.E: Project Consistency with City of Lake Elsinore Climate Action Plan

CAP Measure	Consistency
Measure T-1.2: Pedestrian Infrastructure	***Consistent.*** This measure requires the installation of sidewalks along new and reconstructed streets and sidewalks or paths to internally link all uses and provide connections to neighborhood activity centers, major destinations, and transit facilities contiguous with a project site. The Project area includes a new 5-foot-wide surface walk accessible path of travel from public sidewalk and parking stalls to the primary building entrance. In addition, the Project would include construction of the Baker Street realignment to Nichols Street and improvements from Pierce Street to Hoff Avenue southwest of the site. As such, the proposed Project would not conflict with this measure.
Measure T-1.4: Bicycle Infrastructure	***Consistent.*** This measure requires new development 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. The proposed Project includes 37.86 acres of off-site improvements on Baker Street and Pierce Street and the realignment of Baker Street to Nichols Road. The proposed Project would dedicate a right-of-way (ROW) to meet the ultimate 68-foot ROW on Baker Street and a 60-foot ROW on Pierce Street as required by the City's General Plan Circulation Element. As such, the proposed Project would meet the City's requirements for roadway design and would not conflict with this measure.
Measure T-1.5: Bicycle Parking Standards	***Consistent.*** This measure requires the City to enforce short-term and long-term bicycle parking standards for new nonresidential developments. The proposed Project would provide bike racks for bicycle parking. As such, the proposed Project would not conflict with this measure.
Measure T-2.1: Designated Parking for Fuel Efficient Vehicles	***Consistent.*** This measure requires new nonresidential developments to designate 10 percent of total parking spaces for low-emitting, fuel-efficient vehicles. As discussed above, the proposed Project would include electric vehicle (EV) charging infrastructure that, at minimum, would equal the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code (CALGreen), Section A5.106.5.3.2. The Project is designed to include 24 EV charging spaces installed and operational upon completion, with infrastructure in place to accommodate an additional 69 EV charging spaces for future use. As such, the proposed Project would not conflict with this measure.
Measure T-4.1: Commute Trip Reduction Program	***Not Applicable.*** This measure requires the City to institute a commute trip reduction program for employers with fewer than 100 employees. This is a community policy-based goal; therefore, this measure would not be applicable to the Project.
Measure E-1.1: Tree Planting Requirements	***Consistent.*** This measure requires new developments to plant at minimum one 15-gallon nondeciduous, umbrella-form tree per 30 linear feet of boundary length near buildings. A combination of drought-tolerant plant material, including evergreen and deciduous trees, low shrubs, and masses of groundcovers, would be installed throughout the Project site pursuant to the City's Municipal Code requirements. In addition, the proposed Project would incorporate standard streetscape landscaping along Project roadways that would meet the City's landscaping requirements to provide buffering between

Table 3.8.E: Project Consistency with City of Lake Elsinore Climate Action Plan

CAP Measure	Consistency
	the on-site warehouse uses and adjacent off-site uses. As such, the proposed Project would not conflict with this measure.
Measure E-1.2: Cool Roof Requirements	***Consistent with MM GHG-3.*** This measure requires new nonresidential development to use roofing materials that have solar reflectance, thermal emittance, or Solar Reflectance Index consistent with CALGreen Tier 1 values. As required by MM GHG-3, the proposed Project shall be designed to achieve energy-efficient buildings exceeding the 2022 Title 24 standards, including that all roofing material shall be Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance. As such, with implementation of MM GHG-3, the proposed Project would not conflict with this measure.
Measure E-1.3: Energy Efficient Building Standards	***Consistent with MM GHG-3.*** This measure requires that new construction exceed the California Energy Code requirements through either the performance-based or prescriptive approach described in CALGreen. As discussed, MM GHG-3 requires that the proposed Project be designed to achieve energy-efficient buildings exceeding the 2022 Title 24 standards. As such, with implementation of MM GHG-3, the proposed Project would not conflict with this measure.
Measure E-3.2: Energy Efficient Street and Traffic Signal Lights	***Consistent.*** This measure requires the City to work with SCE to replace existing high-pressure sodium streetlights and traffic lights with high-efficiency alternatives, such as light-emitting diode (LED) lights; replace existing City-owned traffic lights with LED lights; and require any new street and traffic lights to be LED. Any traffic lights replaced or installed as part of the Project would be required to comply with the Municipal Code and Conditions of Approval. As such, the proposed Project would not conflict with this measure.
Measure E-4.1: Landscaping Ordinance	***Consistent.*** This measure requires the City to enforce its Assembly Bill (AB) 1881 Landscaping Ordinance, adopted by the City of Lake Elsinore Municipal Code, Chapter 19.08,[35] which requires that landscaping be water efficient, thereby consuming less energy and reducing emissions. A combination of drought-tolerant plant material, including evergreen and deciduous trees, low shrubs, and masses of groundcovers, would be installed throughout the Project site pursuant to the City's Municipal Code requirements. Landscaping would include accent trees, shrubs, and groundcover installed at key corners and driveway entries. Project landscaping would be designed to screen the proposed buildings, parking areas, loading dock activities, and any truck traffic passing through the Project site. As such, the proposed Project would not conflict with this measure.
Measure E-4.2: Indoor Water Conservation Requirements	***Consistent.*** This measure requires that development projects reduce indoor water consumption. As identified above, the proposed Project would comply with current CALGreen standards, which include a variety of different measures, including reduction of wastewater and water use. As such, the proposed Project would not conflict with this measure.

[35] City of Lake Elsinore. 2024. *Lake Elsinore Municipal Code Chapter 19.08 Water Efficient Landscape Requirements.* May 28. Website: https://www.codepublishing.com/CA/LakeElsinore/html/LakeElsinore19/LakeElsinore1908.html (accessed August 2025).

Table 3.8.E: Project Consistency with City of Lake Elsinore Climate Action Plan

CAP Measure	Consistency
Measure E-5.1: Renewable Energy Incentives	***Not Applicable.*** This measure facilitates the voluntary installation of small-scale renewable energy systems, such as solar photovoltaic and solar hot water systems, by connecting residents and businesses with technical and financial assistance through the City's website. This is a community policy-based goal; therefore, this measure would not be applicable to the Project.
Measure S-1.4: Construction and Demolition Waste Diversion	***Consistent with MM GHG-1.*** This measure requires development projects to divert, recycle, or salvage nonhazardous construction and demolition debris generated at the site, and requires all construction and demolition projects to be accompanied by a waste management plan for a project. MM GHG-1 requires that separate recycling bins be provided for each industrial building with the capacity to provide a 60 percent diversion of waste from the site. As such, with implementation of MM GHG-1, the proposed Project would not conflict with this measure.

Source: Urban Crossroads, *Baker Lake Elsinore Greenhouse Gas Analysis*, Table 3-7 (June 3, 2025).

3.8.7 Level of Significance Prior to Mitigation

Significant impacts related to GHG emissions would occur from Project operations. Prior to mitigation, the proposed Project has the potential to result in significant impacts related to the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment and to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.

3.8.8 Project Design Features and Mitigation Measures

3.8.8.1 Project Design Features

The following PDFs would be incorporated as part of the Project design.

PDF AQ-1 (Refer to Section 3.3, Air Quality, of this Draft EIR)

PDF AQ-2 (Refer to Section 3.3, Air Quality, of this Draft EIR)

PDF AQ-3 (Refer to Section 3.3, Air Quality, of this Draft EIR)

PDF AQ-4 (Refer to Section 3.3, Air Quality, of this Draft EIR)

PDF AQ-5 (Refer to Section 3.3, Air Quality, of this Draft EIR)

3.8.8.2 Mitigation Measures

The following mitigation measures are applicable to the proposed Project.

MM AQ-1 (Refer to Section 3.3, Air Quality, of this Draft EIR)

MM AQ-2 (Refer to Section 3.3, Air Quality, of this Draft EIR)

MM AQ-3 (Refer to Section 3.3, Air Quality, of this Draft EIR)

MM AQ-4 (Refer to Section 3.3, Air Quality, of this Draft EIR)

MM AQ-5 (Refer to Section 3.3, Air Quality, of this Draft EIR)

MM AQ-6 (Refer to Section 3.3, Air Quality, of this Draft EIR)

MM GHG-1 **Recycling Bins.** The Project plans and specifications shall require that, prior to receipt of occupancy permits, separate recycling bins be provided for each industrial building with the capacity to provide 60 percent diversion of waste from the site.

MM GHG-2 **Drought-Tolerant Landscaping.** The Project plans and specifications shall include a requirement that all landscaping and trees throughout the Project site be drought-tolerant, low-water plants and shall use water with drip irrigation and weather-based smart irrigation controllers.

MM GHG-3 **Exceed Energy-Efficient Building Requirements.** Prior to the issuance of building permits, the Project Applicant or successor in interest shall provide documentation to the City demonstrating that the Project is designed to achieve energy-efficient buildings exceeding the 2022 Title 24 standards, with the following design criteria:

1. Building envelope insulation of conditioned space within the building shall be R15 or greater for walls and R30 or greater for attics/roofs.

2. Windows shall have an insulation factor of 0.28 or less Ufactor and 0.22 or less Solar Heat Gain Coefficient.

3. All roofing material shall be Cool Roof Rating Council (CRRC) Rated 0.15 aged solar reflectance or greater and 0.75 thermal emittance.

4. All heating/cooling ducting within the buildings shall be insulated with R-4.2, R-8, or greater insulation.

5. All heating and cooling equipment shall be Energy Efficient Ratio 14 percent Annual Fuel Utilization Efficiency, or 7.7 Heating Seasonal Performance Factor levels of efficiency or greater.

6. All water heaters shall be high-efficiency electric water heaters with a minimum 0.72 Energy Factor or greater.

7. Lighting within the building shall be high-efficiency LED lighting with a minimum of 60 lumens/watt for fixtures greater than 40 watts.

3.8.9 Level of Significance after Mitigation

Implementation of **MM AQ-1** through **MM AQ-6**, **PDF AQ-1** through **PDF AQ-5**, and **MM GHG-1** through **MM GHG-3** would incorporate strategies that would contribute to reducing Project GHG emissions, including those associated with HDT emissions. Although these mitigation measures would reduce GHG emissions generated during operational activities associated with the proposed Project, they would provide emissions reductions that are not quantifiable. With implementation of **MM AQ-1** through **MM AQ-6**, **PDF AQ-1** through **PDF AQ-5**, and **MM GHG-1** through **MM GHG-3**, emissions associated with operation of the proposed Project would still exceed the City's preferred significance thresholds; therefore, the Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050). Impacts would remain **significant and unavoidable**.

3.8.10 Cumulative Impacts

As defined in Section 15130 of the *State CEQA Guidelines,* cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, present, and probable future projects within the cumulative impact area for GHG emissions. In addition, according to Section 15355 of the *State CEQA Guidelines*, the cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. However, unlike the cumulative analysis for many topics that address the combined impacts of a proposed project in addition to related projects in a project study area, the analysis of impacts related to GHG emissions is inherently cumulative. Moreover, pursuant to SCAQMD methodology, if GHG emissions exceed the applicable threshold, it would result in both a project and a cumulative impact.

As previously stated, GHG emissions associated with the proposed Project would exceed the City's preferred threshold of 3,000 MT CO_2e/year. Since GHG is a global issue and the Project's emissions represent a negligible amount comparative to global and State emissions, it is extremely unlikely that the proposed Project would generate enough GHG emissions to influence climate change on its own. However, because Project-related CO_2e emissions would exceed the City's preferred thresholds even with implementation of **MM AQ-1** through **MM AQ-6**, **PDF AQ-1** through **PDF AQ-5**, and **MM GHG-1** through **MM GHG-3**, the proposed Project would have a significant contribution to cumulatively considerable GHG emission impacts. Impacts would be **significant and unavoidable**.

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3.9 HAZARDS AND HAZARDOUS MATERIALS

This section of the Draft Environmental Impact Report (EIR) discusses known and potential hazards and hazardous materials conditions at the Project site and in the surrounding area and provides an analysis of the potential public health impacts anticipated with implementation of the proposed Project. This section also discusses local, State, and federal regulations and policies pertaining to hazards and hazardous materials and provides recommended measures pursuant to the California Environmental Quality Act (CEQA). For the purposes of this analysis, hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and petroleum products that, if released, are harmful to human health and the environment. This section summarizes information provided in the *Phase I Environmental Site Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530* (Phase I ESA).[1] This report is included as Appendix I to this Draft EIR.

Data from the County of Riverside (County) General Plan, County of Riverside General Plan EIR, City of Lake Elsinore (City) General Plan, City of Lake Elsinore General Plan EIR, and City of Lake Elsinore Municipal Code are also incorporated into this section.

3.9.1 Scoping Process

Potential impacts from hazardous materials were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received two comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to hazardous materials. NOP comments related to hazardous materials included comments from the following:

- The Riverside County Department of Waste Resources, July 15, 2024, recommended hazardous waste be transported and disposed of in accordance with regulatory policies.

- Briana Sara and Elliot Ruhland, August 19, 2024, expressed concern regarding potential contamination risks to nearby water sources from hazardous materials, as well as potential exposure of workers and residents to hazardous materials.

For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.9.2 Methodology

To assess the potential hazards and hazardous materials conditions at the Project site and in the surrounding area, EnviroApplications prepared the site-specific Phase I ESA for the proposed Onsite Development Area, specifically for Assessor's Parcel Numbers (APNs) 378-020-014, 378-020-015, 378-020-016, 378-020-028, 378-020-029, 378-020-030, 378-020-031, 378-020-036, 378-020-037, and 378-020-048, that included a search of available environmental records within up to a 1-mile search radius that encompassed the Onsite Development Area, Offsite Improvement Area, Restoration Area, and

[1] EnviroApplications, Inc. 2023. *Phase I Environmental Site Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530*. August 4. Appendix I.

Construction/Improvements Buffer. The Phase I ESA was prepared in accordance with Title 40 Code of Federal Regulations (CFR) Part 312 and the American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM E1527-21) to identify, to the extent feasible, the presence of recognized environmental conditions (RECs), historical recognized environmental conditions (HREC), and controlled recognized environmental conditions (CRECs) with respect to the Project site as defined in ASTM E1527-21.

According to the ASTM, an REC means the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.[2] An HREC is an environmental condition that in the past would have been considered an REC but may or may not be considered an REC currently. If a past release of any hazardous substances or petroleum products has occurred in connection with the property, with such remediation accepted by the responsible regulatory agency (for example, as evidenced by the issuance of a case closed letter or equivalent), this condition shall be considered an HREC. A CREC is an REC resulting from the past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (i.e., as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

The Phase I ESA implements the following methodology:

3.9.2.1 Background Research and Data Review

A government agency database search report was obtained from Environmental Data Resources, Inc. (EDR), a third-party environmental database search firm, to identify potential RECs, HRECs, and CRECs within up to 1 mile of the Onsite Development Area that encompassed the Onsite Development Area, Offsite Improvement Area, Restoration Area, and Construction/Improvements Buffer and assess potential concerns associated with the migration of hazardous substances to the Onsite Development Area from potential off-site sources. A historical records review was also performed to identify the past uses of the Onsite Development Area and surrounding areas, as they may relate to the environmental condition of the Onsite Development Area.

3.9.2.2 Site Reconnaissance

On July 27, 2023, the Onsite Development Area was visually assessed for potential RECs, HRECs, and CRECs, including, but not limited to, potential underground storage tanks (USTs), aboveground storage tanks (ASTs), polychlorinated biphenyl (PCB) containing equipment, hazardous materials storage or handling areas, containerized or bulk wastes, and visual indications of impacted soil.

[2] The term "recognized environmental conditions" is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be *de minimis* are not recognized environmental conditions.

3.9.3 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within Riverside County, Lake Elsinore, and the Project site as it relates to hazards and hazardous materials.

The 140.04-acre Project site consists of four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings an associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities; and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

3.9.3.1 Riverside County

There is a long history of agricultural production in Riverside County. Agricultural activities typically include the storage and periodic application of pesticides, herbicides, and fertilizers, as well as the storage and use of toxic fuels and solvents. The infiltration of these substances may leach into local groundwater supplies, presenting an elevated risk of groundwater contamination.[3]

According to the County of Riverside General Plan, the majority of hazardous materials in Riverside County are transported by trucks on Interstate (I-)10, I-15, I-215, State Route (SR-)60 and SR-91. The most vulnerable areas along these routes are considered to be the on-/off-ramps and interchanges. Pipeline systems also carry hazardous materials, and under some conditions, these pipelines can rupture and cause a release of hazardous materials. Major freeways are areas of concern for potential hazardous material release events.

Risk of and vulnerability to wildfire is a significant concern in Riverside County, especially in the county's western portion, encompassing forests and shrublands, which are not located in the vicinity of the Project site. According to the County's General Plan, wildfire hazard is the highest-priority hazard in Riverside County and is the hazard with the greatest potential for catastrophic loss. Wildfires can occur on mountains, hillsides, and grasslands. In the county, native vegetation, such as chaparral, sage, and grassland, provides fuel that allows fire to spread easily across large tracts of land. A significant portion of the county is undeveloped and consists of rugged topography with highly flammable vegetation. In particular, the hillside terrain of Riverside County has a substantial fire risk, and a majority of this region is considered a Very High Fire Hazard Severity Zone (VHFHSZ).[4]

Emergency preparedness activities in Riverside County are conducted through the County's Emergency Management Department (EMD), and the Emergency Operations Center (EOC), in cooperation with local cities, special districts, and fire and law enforcement agencies, provides

[3] County of Riverside. *General Plan, Final Program, Environmental Impact Report,* Volume 1. Website: https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i#4.11 (accessed July 26, 2024).

[4] Ibid.

emergency management services. The EMD prepares emergency and contingency plans, ranging from evacuation plans to emergency operations plans, that help specify the roles and responsibilities of first responders and emergency management personnel for an incident. The County of Riverside uses Alert RivCo, a phone alert system to alert residents and businesses in the county who are affected, threatened, or might be endangered by an emergency event or a disaster, such as wildfires, floods, hazardous materials, severe weather, and certain law enforcement incidents. Alert RivCo is part of a group of alert and warning tools used in the county. Additional emergency management and response services for jurisdictions throughout the county are provided through a mutual-aid agreement with the Riverside County Fire Department (RCFD) and the California Department of Forestry and Fire Protection (CAL FIRE). In addition, the County of Riverside is required under State law to prepare and maintain a Standardized Emergency Management System (SEMS) Multi-hazard Functional Plan.

3.9.3.2 City of Lake Elsinore

According to the City of Lake Elsinore General Plan, a large number of businesses and other entities within the city generate, transport, store, treat, or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). The RCFD provides oversight of hazardous materials and regulates permits for the handling, storage, and use of any explosive or other hazardous material in the city. These permits note the location of the user as well as the type of material used. This enables the City to be aware of locations where hazardous materials are used and areas where high concentrations of hazardous materials are being used by multiple users, such as industrial and manufacturing areas.

Much of the area in the southwest, west, and northwest of the city supports coastal shrub and chamise redshank chaparral, which are prime fuel sources for wildfire. The steep terrain in these areas also contributes to rapid spread of wildfire when one occurs. According to the City of Lake Elsinore General Plan, wildfire susceptibility in the city is defined as moderately high.[5]

3.9.3.3 Project Site and Vicinity

The 140.04-acre Project site is irregular in shape and generally surrounded by undeveloped land in all directions. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the western boundary of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a single-family residence are located outside of and adjacent to the southeastern boundary of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). The Project site has a history of limited agriculture use; however, no agricultural uses existed on the site after 1962.

From at least as early as 1938 until circa 1962, the Onsite Development Area was a rural residential property with limited agriculture uses occurring thereon. From 1963 to present, the Onsite Development Area has been vacant, with minimal to no agricultural use. Residual pesticides and other

[5] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan. Chapter 3.0, Public Safety and Welfare. December 13.

agricultural chemicals are considered a potential (though limited) environmental impact issue for the Onsite Development Area. If residential uses were proposed on site, the Phase I ESA recommends shallow soil sampling and analysis for these chemicals. Since the proposed use here is nonresidential, soils were not tested for pesticides and other chemicals during preparation of the Phase I ESA. In addition, one of the parcels within the Onsite Development Area (17111 Baker Street [APN 378-020-029]) is listed in the Clandestine Drug Labs (CDL) and California Environmental Protection Agency (CalEPA) HAZNET databases for operation of an illegal drug lab or drug lab equipment and the disposal of low-pH and organic liquid drug lab wastes. This parcel was first listed in 1996, and cleanup of the lab chemicals by the California Department of Toxic Substances Control (DTSC) took place in 1996.

The site reconnaissance identified remnants of a single-family residence (i.e., demolition debris) and portions of a chain-link fence within the Onsite Development Area, respectively located on APN 378-020-029 (addressed as 17111 Baker Street) and APN 378-020-037 (addressed as 17377 Baker Street). The site reconnaissance did not identify any hazardous substances, petroleum products, USTs, ASTs, or PCB-containing equipment as present on the Project site, including the Onsite Development Area, Offsite Improvements Area, Restoration Area, or Construction/Improvements Buffer. As part of the ASTM E1527-21 process, an interview questionnaire was presented to the user of the proposed Onsite Development Area. The questionnaire was completed, and no potential soil and/or groundwater impacts were identified in the Onsite Development Area. There is no knowledge of past chemical use, storage, spills, or releases on the Project site, including the Onsite Development Area, Offsite Improvements Area, Restoration Area, or Construction/Improvements Buffer.

A limited area of undocumented artificial fill of trash and soil exists in the Onsite Development Area in the central portion of the Project site. The trash and soil pit is approximately 9 feet in depth and located adjacent to an old building pad. This is the only identified undocumented fill mapped on the site.[6]

The entire 140.04-acre Project site is located within a VHFHSZ in the Local Responsibility Area (LRA) for the City of Lake Elsinore.[7] In addition, the City of Lake Elsinore General Plan identifies the entire 140.04-acre Project site as being within a Very High Fire Hazard Zone.[8]

The nearest airport to the Project site is Perris Valley Airport, located approximately 8.5 miles northeast of the Project site. The next nearest airport is Ontario International Airport (ONT), located over 26 miles northwest of the Project site.

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6 LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. January 31. Appendix G-1.

7 California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed July 26, 2025).

8 City of Lake Elsinore. 2011. City of Lake Elsinore General Plan. Chapter 3.0, Public Safety and Welfare, Figure 3.1, Wildfire Susceptibility. December 13.

3.9.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

Hazards and hazardous materials are subject to numerous federal, State, and local laws and regulations intended to protect health, safety, and the environment. The United States Environmental Protection Agency (USEPA), CalEPA, DTSC, Santa Ana Regional Water Quality Control Board (RWQCB), and County of Riverside are the primary agencies responsible for enforcing these regulations. Local regulatory agencies enforce many federal and State regulations through the Certified Unified Program Agency (CUPA) program.

3.9.4.1 Federal Policies and Regulations

Occupational Safety and Health Administration (OSHA), 29 CFR. OSHA is the federal agency responsible for ensuring worker safety and enforces regulations from CFR Title 29. These regulations provide standards for safe workplaces and work practices, including those relating to hazardous materials handling.

USEPA, 40 CFR §700–799 (Toxic Substances Control Act). The Toxic Substances Control Act regulates manufacturing, inventory, and disposition of industrial chemicals, including hazardous materials. It addresses the production, importation, use, and disposal of specific chemicals including PCBs, asbestos-containing materials (ACMs), and lead-based paint (LBP).

United States Department of Transportation (USDOT) Regulations, 49 CFR. USDOT, in conjunction with the USEPA, is responsible for enforcement and implementation of federal laws and regulations pertaining to the safe storage and transportation of hazardous materials. CFR Title 49, §171–180, regulates the transportation of hazardous materials, types of materials defined as hazardous, and marking of vehicles transporting hazardous materials.

Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) (42 United States Code [USC] §9601 et seq.). The purpose of CERCLA, often referred to as "Superfund," is to identify and clean up abandoned contaminated sites so that public health and welfare are not compromised. CERCLA provides a federal "Superfund" to clean up such sites. The law also imposes liability on parties responsible for, in whole or in part, the presence of hazardous substances at a site.

Resource Conservation and Recovery Act of 1976 (42 USC §6901 et seq.). The RCRA provides for "cradle-to-grave" regulation of hazardous waste generated by operating entities. This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. The RCRA also establishes a framework for the management of nonhazardous solid wastes.

Clean Water Act (CWA) – National Pollutant Discharge Elimination System (Clean Water Act §402[p]) (33 USC §1342[p]). The CWA regulates discharges and spills of pollutants, including hazardous materials, to surface waters and groundwater. It requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal

coliform bacteria) or narrative statements that represent the quality of water that supports a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

Federal Air Regulations, 14 CFR, Part 77. The Federal Aviation Administration (FAA) is responsible for the review of construction activities that occur in the vicinity of airports. Its role in reviewing these activities is to ensure that new structures do not result in a hazard to aviation. The regulations in the Federal Air Regulations (14 CFR Part 77) are designed to ensure that no obstructions in navigable air space are allowed to exist that would endanger the public. Federal Air Regulations Part 77 identifies the minimum height at which a structure would be considered an obstacle at any given point around an airport. The extent of the off-airport coverage that needs to be evaluated for tall-structure impacts can extend miles from an airport facility. In addition, Federal Air Regulations Part 77 establishes standards for determining whether objects constructed near airports will be considered obstructions in navigable airspace, sets forth notice requirements of certain types of proposed construction or alterations, and provides for aeronautical studies to determine the potential impacts of a structure on the flight of aircraft through navigable airspace.

3.9.4.2 State Policies and Regulations

Assembly Bill 2948. In response to the growing statewide concern of hazardous waste management, Assembly Bill (AB) 2948 (Tanner Act of 1986) enacted legislation authorizing local governments to develop comprehensive hazardous waste management plans. The intent of each plan is to ensure that adequate treatment and disposal capacity is available to manage the hazardous wastes generated within its jurisdiction.

California State Hazard Mitigation Plan. The purpose of the State Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities, emphasizing partnerships among local, State, and federal agencies as well as the private sector.

California Occupational Safety and Health Administration (Cal/OSHA) Regulations. Cal/OSHA is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Among other requirements, Cal/OSHA requires many entities to prepare injury and illness prevention plans and chemical hygiene plans and provides specific regulations to limit the exposure of construction workers to lead.

California Code of Regulations (CCR) Title 8. California standards for workers dealing with hazardous materials are contained in CCR Title 8 and include practices for all industries (General Industrial Safety Orders), as well as specific practices for construction. Workers at hazardous waste sites (or workers who may be exposed to hazardous wastes that might be encountered during excavation of contaminated soils) must receive specialized training and medical supervision according to the

Hazardous Waste Operations and Emergency Response regulations.[9] Additional regulations have been developed for construction workers potentially exposed to lead[10] and asbestos.[11]

Cortese List Statute (California Government Code, §65962.5). This statute requires the DTSC to compile and maintain lists of potentially contaminated sites throughout the State and includes the Hazardous Waste and Substances Sites List. The overall list is called the "Cortese" List.

Porter-Cologne Water Quality Control Act of 1970. The CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Each RWQCB must formulate and adopt a water quality plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water plans and policies. The Porter-Cologne Act also provides that an RWQCB may include a regional plan with water discharge prohibitions applicable to conditions, areas, or types of waste particular to that region. The city, including the Project site, is within the jurisdictional boundaries of the Santa Ana RWQCB (Region 8).

Safe Drinking Water and Toxic Enforcement Act (Proposition 65, California Health and Safety Code, §25249.5 et seq.). The Safe Drinking Water and Toxic Enforcement Act is similar to the Federal Safe Drinking Water Act and CWA in that it regulates the discharge of contaminants to sources of drinking water.

California Government Code 51178. This statute requires the State Fire Marshal to identify areas in the State as moderate, high, and very high fire hazard severity zones based on consistent statewide criteria and on the severity of fire hazard that is expected to prevail in those areas. Moderate, high, and very high fire hazard severity zones shall be based on fuel loading, slope, fire weather, and other relevant factors, including areas where winds have been identified by the Office of the State Fire Marshal as a major cause of wildfire spread.

California Senate Bill (SB) 12. This legislation establishes new rules for the construction of industrial, commercial, and residential projects to improve fire safety and prevention. These regulations apply

9 California Code of Regulations, Title 8, Section 5192.
10 California Code of Regulations, Title 8, Section 1532.1.
11 California Code of Regulations, Title 8, Section 1529.

to building materials that are more fire-resistant and defensible space incorporated into the design of projects.

California Health and Safety Code, Division 20, Chapter 6.6 (Safe Drinking Water and Toxic Enforcement Act of 1986), §25249.5 to §25249.14, and Chapter 6.95 (Hazardous Materials Release Response Plans and Inventory), Article 1, §25500 to §25519. Chapter 6.6, Safe Drinking Water and Toxic Enforcement Act of 1986 (codified version of Proposition 65), regulates the discharge of contaminants to groundwater. Chapter 6.95, Hazardous Materials Release Response Plans and Inventory, requires the establishment of business and area plans related to handling and release or threatened release of hazardous materials. Pursuant to California Health and Safety Code Section 25507, a business shall establish and implement a Hazardous Materials Business Plan (HMBP) for emergency response to a release or threatened release of a hazardous material in accordance with the standards prescribed in the regulations adopted pursuant to Section 25503 if the business handles a hazardous material or a mixture containing a hazardous material that has a quantity at any one time above the thresholds described in Section 25507(a) (1) through (8). The HMBP aims to prevent or minimize harm to public health and safety and the environment from a release or threatened release of a hazardous material. This is accomplished by providing emergency responders with the necessary information to effectively protect the public. CalEPA oversees the implementation of the HMBP program at the State level. CUPAs and Participating Agencies (PAs) implement the program at the local level and are responsible for enforcement and administration in their respective jurisdictions.

3.9.4.3 Regional Policies and Regulations

Certified Unified Program Agency. SB 1082 established the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which was created to consolidate and coordinate the administration, permitting, inspection, and enforcement activities of statewide environmental regulatory programs. The Unified Program provides for the designation of a local CUPA that would be responsible for the permitting process and collection of fees regarding hazardous materials, overseen by CalEPA. The CUPA would be responsible for implementing at the local level the Unified Program, which serves to consolidate, coordinate, and make consistent the administrative requirements, permits, inspections, and enforcement activities for the following environmental and emergency management programs:

- Hazardous Waste (Hazardous Waste Generator [HWG] Program);
- Hazardous Materials Business Plan;
- California Accidental Release Prevention Program (CalARP);
- Underground Hazardous Materials Storage Tanks (UST Program);
- Aboveground Petroleum Storage Tanks/Spill Prevention Control & Countermeasure Plans (Aboveground Petroleum Storage Act [APSA] Program); and
- HWG and On-Site Hazardous Waste Treatment (tiered permitting) Programs.

The Riverside County Department of Environmental Health (DEH) Hazardous Materials Branch is designated as the CUPA responsible for implementing the above-listed program elements. The laws and regulations that established these programs require that businesses that use or store certain quantities of hazardous materials submit an HMBP that describes the hazardous materials usage, storage, and disposal required by the CUPA.

As the CUPA, the DEH Hazardous Materials Branch coordinates the following seven programs regulating hazardous materials and hazardous wastes in Riverside County:

- USTs;
- ASTs;
- CalARP;
- HMBP;
- Emergency Response Team;
- Waste Generator; and
- Waste Treatment (tiered).

3.9.4.4 Local Policies and Regulations

City of Lake Elsinore Emergency Preparedness Plan. The City is responsible for developing emergency plans and actions in response to actual or potential disasters which may impact the City. The City designs and conducts exercises for different scenarios and coordinates emergency training to ensure that it is able to respond to natural, human-caused, and technological emergencies. The Emergency Preparedness Plan outlines response strategies and tactics for a wide range of emergencies, including earthquakes, wildfires, flooding, terrorism, civil unrest, nuclear plant emergencies, severe weather, extreme heat, droughts, utility outages, transportation accidents, and hazardous materials releases. The City fulfills a wide variety of roles from the field response to emergency incidents to operating the City's EOC in supporting and recovering from major emergencies and disasters.[12]

City of Lake Elsinore Local Hazard Mitigation Plan. The City's Local Hazard Mitigation Plan identifies the City's hazards, reviews and assesses past disaster occurrences, estimates the probability of future occurrences, and sets goals to mitigate potential risks to reduce or eliminate long-term risks to people and property from natural and man-made hazards. The plan was prepared pursuant to the requirements of the Disaster Mitigation Act of 2000 to achieve eligibility and potentially secure mitigation funding through the Federal Emergency Management Agency (FEMA) Flood Mitigation Assistance, Pre-Disaster Mitigation, and Hazard Mitigation Grant Programs.[13]

City of Lake Elsinore General Plan, Chapter 3.0, Public Safety and Welfare. Chapter 3.0 of the City's General Plan addresses public safety and welfare issues, including hazards and hazardous materials. The focus of Chapter 3.0 is on maintaining a healthy and safe physical environment and ensuring community welfare through access to effective and efficient high-quality public services. The

[12] City of Lake Elsinore. Emergency Preparedness. Website: https://www.lake-elsinore.org/208/Emergency-Preparedness (accessed July 27, 2024).

[13] City of Lake Elsinore. 2017. *Local Hazard Mitigation Plan.* June.

following goals and policies related to hazards and hazardous materials are applicable to the proposed Project:

- **Goal 3:** Reduce the level of risk associated with the use, transport, treatment, and disposal of hazardous materials to protect the community's safety, health, and natural resources.
    - **Policy 3.1:** Continue to require hazardous waste generators to implement a waste reduction program per the Riverside County Hazardous Waste Management Plan with necessary inspections per the Riverside County Hazardous Materials Handlers Program.
- **Goal 4:** Adhere to an integrated approach to minimizing the threat of wildland fires to protect life and property using pre-fire management, suppression, and post-fire management.
    - **Policy 4.1:** Require on-going brush clearance and establish low fuel landscaping policies to reduce combustible vegetation along the urban/wildland interface boundary.
    - **Policy 4.2:** Create fuel modification zones around development within high hazard areas by thinning or clearing combustible vegetation within 100 feet of buildings and structures. The fuel modification zone size may be altered with the addition of fuel resistant building techniques. The fuel modification zone may be replanted with fire-resistant material for aesthetics and erosion control.

3.9.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Guidelines.* Based on these thresholds, implementation of the proposed Project would have a significant adverse impact related to hazards and hazardous materials if it would:

Threshold 3.9.1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

Threshold 3.9.2: 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;

Threshold 3.9.3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school;

Threshold 3.9.4: 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 create a significant hazard to the public or the environment;

Threshold 3.9.5: 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, the project would result in a safety hazard or excessive noise for people residing or working in the project area;

Threshold 3.9.6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; or

Threshold 3.9.7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

3.9.6 Project Impacts

Threshold 3.9.1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Development of the proposed Project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials. All hazardous materials must be disposed of in accordance with the federal, State, and local (Riverside County Department of Public Health and SCAQMD) regulations to safeguard the public from significant hazards during the disposal of hazardous materials.

Construction. Construction of the proposed Project would temporarily increase the regional transport, use, and disposal of construction-related hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints and solvents, and cement products containing strong basic or acidic chemicals). These materials are commonly used at construction sites, and construction of the proposed Project would be required to occur in compliance with applicable State and federal regulations for proper transport, use, storage, and disposal of excess hazardous materials and hazardous construction waste.

The temporary transport, use, storage, or disposal of fuels, lubricants, paints, and other hazardous materials related to construction would not pose a potentially significant hazard to the public or the environment unless the materials were accidently spilled or released into the environment. California standards for workers dealing with hazardous materials are contained in CCR Title 8 and include practices for all industries (General Industrial Safety Orders), as well as specific practices for construction. Workers at hazardous waste sites (or workers who may be exposed to hazardous wastes that might be encountered during excavation of contaminated soils) must receive specialized training and medical supervision according to the Hazardous Waste Operations and Emergency Response regulations.[14] Additional regulations have been developed for construction workers potentially exposed to lead[15] and asbestos.[16]

The transport, use, storage, or disposal of hazardous materials during construction would be regulated by the RCFD and Cal/OSHA. Additionally, the USDOT Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials by truck and rail on State highways and rail lines, as described in CFR Title 49 and implemented by CCR Title 13. In addition, **Regulatory Compliance Measures (RCMs) WQ-1** through **WQ-4,** provided in Section 3.10, Hydrology and Water Quality, of this EIR, would ensure compliance with waste discharge

[14] California Code of Regulations, Title 8, Section 5192.
[15] California Code of Regulations, Title 8, Section 1532.1.
[16] California Code of Regulations, Title 8, Section 1529.

permit requirements to avoid potential impacts to water quality due to spills or runoff from hazardous materials used during construction. Therefore, through compliance with applicable regulatory policies and adherence to the regulatory standards included in **RCMs WQ-1** through **WQ-4**, impacts related to the routine transport, use, or disposal of hazardous materials during construction would be **less than significant**.

Operation. Warehousing uses operated on the Onsite Development Area could accommodate manufacturing activities, which could include the use and disposal of hazardous waste along with limited use of pesticide and herbicides for landscape maintenance.[17] Further, vehicles accessing the Project site would contain oil and gasoline to power their engines, which could have the potential to result in minor releases of such substances through drips or leaks in parking areas. Transport trucks driving to and from the Project site may also contribute to accidental releases of oil and gasoline in loading dock areas and parking areas. The proposed Project is not anticipated to generate or use major hazardous materials and would not generate high quantities of hazardous waste.

Chapter 6.95 of the California Health and Safety Code requires all facilities with regulated hazardous materials to file required HMBPs in the statewide information management system or the California Environmental Reporting System (CERS).[18] The CERS is the only approved method for submitting required information, including HMBP information, to the Riverside County DEH and its participating agencies. HMBP information is made available to first responders in the county for emergency response activities. All handlers are required to disclose their inventory of hazardous materials in the form of an HMBP.

The DEH Hazardous Materials Branch identifies the types and amounts of waste generated in Riverside County and establishes programs for managing waste. The DEH Hazardous Materials Branch oversees six hazardous materials programs in the county,[19] which ensures that adequate treatment and disposal capacity is available to manage the hazardous waste generated within the county and address issues related to the disposal, handling, processing, storage, and treatment of local hazardous materials and waste products. The DEH, in conjunction with the RCFD and Cal/OSHA, would review the proposed warehouse uses of the Project for hazardous materials use, safe handling, and storage of materials to ensure that any hazardous waste generated by the Project would be safely stored and transported to an appropriate disposal facility by a licensed hauler in accordance with State and federal law. Additionally, the transport of hazardous materials by truck and rail on State highways and rail lines during Project operation is regulated by the USDOT Office of Hazardous Materials Safety, as described above. These regulations inherently safeguard life and property from the hazards of fire/explosion arising from the storage, handling, and disposal of hazardous substances, materials, and devices, as well as hazardous conditions due to the use or occupancy of buildings. Therefore, the proposed Project would be

[17] Pesticide and herbicide use by the proposed Project would comply with regulations set forth by the California Department of Pesticide Regulation (CDPR) by using only registered and permitted pesticides.

[18] California Environmental Protection Agency. Hazardous Materials Business Plan. Website: https://calepa.ca.gov/hazardous-materials-business-plan-program/ (accessed July 29, 2024).

[19] County of Riverside, Department of Environmental Health. 2023. *Hazardous Materials.* Website: https://rivcoeh.org/hazardous-materials (accessed August 10, 2023).

required to prepare and submit an HMBP via CERS as described in **RCM HAZ-1** (see Section 3.9.8, Regulatory Compliance Measures and Mitigation Measures).

With adherence to **RCM HAZ-1,** in conjunction with **RCMs WQ-1** through **WQ-4**, potential impacts from the transport, use, storage, and disposal of hazardous materials would remain **less than significant**. Mitigation is not required.

Threshold 3.9.2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant with Mitigation Incorporated. The Phase I ESA prepared for the Onsite Development Area included a literature review of local, State, and federal databases within up to a 1-mile search radius that encompassed the Onsite Development Area, Offsite Improvement Area, Restoration Area, and Construction/Improvements Buffer for the purposes of identifying RECs, HRECs, and CRECs as defined in ASTM E1527-21.

The Phase I ESA historical review of the Onsite Development Area and 1-mile search radius revealed that from at least as early as 1938 until circa 1962, the Onsite Development Area was a rural residential property with limited agriculture activity. From 1963 to the present, the Onsite Development Area has been considered vacant, with minimal to no agricultural use. Residual pesticides and other agricultural chemicals are considered a potential (though limited) environmental impact issue for the Onsite Development Area; however, the Phase I ESA did not identify this as an ASTM REC associated with the Onsite Development Area.

The site reconnaissance identified remnants of a single-family residence (i.e., demolition debris) and portions of a chain-link fence within the Onsite Development Area, respectively located on APN 378-020-029 (addressed as 17111 Baker Street) and APN 378-020-037 (addressed at 17377 Baker Street). The site reconnaissance did not identify any hazardous substances, petroleum products, USTs, ASTs, or PCB-containing equipment as present on the Project site, including the Onsite Development Area, Offsite Improvements Area, Restoration Area, or Construction/Improvements Buffer.

The Phase I ESA identified one of the parcels that make up the Onsite Development Area (17111 Baker Street [APN 378-020-029]) as listed in the CDL and CalEPA HAZNET databases for operation of an illegal drug lab or drug lab equipment and the disposal of low-pH and organic liquid drug lab wastes. This parcel was first listed in 1996, and the cleanup of the lab chemicals by the DTSC took place in 1996. The Phase I ESA determined that this listing does not qualify as an ASTM REC associated with the Onsite Development Area.

No other evidence of on-site hazardous materials storage and use or hazardous waste generation was found, and no manufacturing operations were found to have ever been located on the Onsite Development Area. As previously stated, a trash and soil pit approximately 9 feet in depth is located on the Project site. However, given that the Geotechnical Investigation only noted the presence of loose, dry, sandy silt with some trash and debris, this feature is not anticipated to contain potentially hazardous materials. Based on the literature review of local, State, and federal databases within up to a 1-mile search radius of the Onsite Development Area, no release sites that qualify as potential

adverse environmental contaminant impact source conditions to the entire 140.04-acre Project site occur. In addition, no potential issues associated with non-ASTM items such as LBP, mold, ACMs, or radon gas were identified. No evidence of an existing ASTM REC, HREC, or CREC associated with the Project site that would represent a significant risk to public health or safety on the Project site was found.

The prior use of the Onsite Development Area and vicinity for agriculture could have resulted in unknown subsurface conditions on the Project site, which could include buried pipelines or irrigation channels, septic tanks,[20] and/or other buried objects/debris that may contain asbestos or other hazardous materials. Accordingly, **Mitigation Measures (MMs) HAZ-1** and **HAZ-2** (provided later in Section 3.9.8, Regulatory Compliance Measures and Mitigation Measures) are prescribed to ensure any lead, asbestos, or other potentially hazardous materials from sources that include these unknown subsurface conditions are managed in accordance with applicable regulatory requirements.

As discussed under Threshold 3.9.1, above, construction of the proposed Project, while involving minimal use of hazardous materials, could result in accidental releases of hazardous materials. **RCMs WQ-1** through **WQ-4**, provided in Section 3.10, Hydrology and Water Quality, of this EIR, would require compliance with the waste discharge permit requirements to ensure construction contractors maintain equipment and supplies on site for containing and cleaning up hazardous materials spills and train workers in such containment and cleanup. In the event of an accidental hazardous materials release of toxicity and/or quantity that on-site workers would be unable to safely contain and clean up, the construction contractor would be required to notify the Riverside County DEH of the release immediately. In addition, as required by **RCM HAZ-1**, the proposed Project would be required to prepare and submit an HMBP via CERS. Finally, only Cal/OSHA licensed Hazardous Materials Substances Removal contractors, and/or California State Registered Asbestos Abatement Contractors registered by the Division of Occupational Health and Safety in accordance with the California Administrative Code, Title 8, Article 2.5, and the SCAQMD Asbestos Hazard Emergency Response Act pursuant to CFR Chapter 40, Part 763, subpart E, shall be allowed to transport hazardous materials off site.

With adherence to **RCMs HAZ-1** and **WQ-1** through **WQ-4**, and implementation of **MMs HAZ-1** and **HAZ-2,** any unanticipated encounters with potentially hazardous materials on the Project site would not create a significant hazard to the public or the environment during the disposal of hazardous materials. The use, storage, transport, and disposal of hazardous materials during construction and operation would not cause significant hazards to the public or the environment through accidental releases of hazardous materials, and impacts would be **less than significant with mitigation incorporated.**

[20] The discovery of septic tanks or similar sewage disposal facilities and subsequent abandonment requires a permit from the Riverside County DEH pursuant to California Plumbing Code Section 722, which stipulates specific conditions for the safe removal of remnant sewage and componentry, backfilling, and inspection from the Riverside County Building & Safety Division.

Threshold 3.9.3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. There are no existing or planned schools within a 0.25-mile radius of the Project site.[21] The Project site is located within the Lake Elsinore Unified School District. According to a review of the SchoolSite Locator for the Lake Elsinore Unified School District and other local mapping resources, the nearest school in proximity to the Project site is Alberhill Elementary School at 4170 Brianna Circle, which is approximately 0.4 mile northwest of the Project site.[22] Any transport of hazardous materials associated with construction of the proposed Project would be in accordance with the United States Department of Transportation (USDOT), which regulates the transport of hazardous materials and waste and requires carriers to register with the DTSC. Only Cal/OSHA licensed Hazardous Materials Substances Removal contractors, and/or California State Registered Asbestos Abatement Contractors registered by the Division of Occupational Health and Safety in accordance with the California Administrative Code, Title 8, Article 2.5, and the SCAQMD Asbestos Hazard Emergency Response Act pursuant to CFR Chapter 40, Part 763, subpart E, would transport hazardous materials off site.

Since no schools are located or proposed within 0.25 mile of the Project site, and any transport of hazardous materials associated with construction and operation of the proposed Project would be in accordance with applicable regulatory policy, impacts related to an accidental release of hazardous materials or emissions of hazardous substances within 0.25 mile of an existing or proposed school would be **less than significant**. Mitigation is not required.

Threshold 3.9.4: Would the project 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 Phase I ESA did not identify any property within the Onsite Development Area or within any other element of the Project site (e.g., Offsite Improvement Area, Restoration Area, or Construction/Improvements Buffer) to be included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, the proposed Project site is not included on any list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. No impact would occur. Mitigation is not required.

Threshold 3.9.5: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest airport to the Project site is Perris Valley Airport, located approximately 8.5 miles northeast of the Project site. The next nearest airport is ONT, which is over 26 miles northwest

[21] Lake Elsinore Unified School District. Lake Elsinore USD SchoolSite Locator. Website: https://www.schoolsitelocator.com/apps/lakeelsinore/ (accessed July 27, 2024).

[22] Ibid.

of the Project site. The Project site is located outside of the Airport Influence Area and Airport Compatibility Zones of Perris Valley Airport.[23] Moreover, the Project is not constructing or erecting any structures that would exceed the 200-foot height threshold imposed by 14 CFR Part 77 for consideration as an obstacle at any given point around an airport, as discussed in Section 3.9.4, Regulatory Setting. Therefore, **no impact** related to airport hazards or excessive noise on customers and employees occupying the Project site would occur. Mitigation is not required.

Threshold 3.9.6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant. As detailed in Section 2.4.4 of the Project Description, the Project includes improvements to select segments of Nichols Road, Pierce Street, and Baker Street. These improvements include paving Baker Street along the frontage of the Onsite Development Area and connecting Baker Street to Nichols Road, as well as paving Pierce Street from Nichols Road toward the southwest to connect to Hoff Avenue, to improve traffic circulation in the Project vicinity and create a second means of emergency access.

Construction activities that may temporarily restrict vehicular traffic would be required to implement appropriate measures to facilitate the passage of persons and vehicles through/around any required road closures. Typical City requirements include prior notification of any lane or road closures with sufficient signage before and during any closures and flag crews with radio communication when necessary to coordinate traffic flow. As prescribed in Section 4.17, Transportation, of this Draft EIR, **RCM TRA-1** requires the construction contractors to implement a Transportation Management Plan (TMP) to manage temporary lane closures along Nichols Road, Pierce Street, and Baker Street so as not to substantially impair these roadways' capacities to accommodate Project and community evacuation and simultaneous emergency access. The proposed Project would be required to comply with these requirements, which would maintain emergency access and allow for evacuation if needed during construction activities. Compliance with these requirements would ensure that short-term (construction) impacts related to this issue would be **less than significant**.

Implementation of the proposed Project would increase the number of vehicles operating near the Project site and would generate an increase in the amount and volume of traffic on local and regional roadway networks. In accordance with the California Fire Code (CFC), the proposed Project would include the design, construction, and maintenance of structures, roadways, and facilities to maintain appropriate emergency/evacuation access throughout the Project site, including the Onsite Development Area.

The proposed Project would include three driveways from Baker Street and one driveway from Pierce Street. The driveways would serve as the first point of access for emergency vehicles, and emergency responders would be able to access the Onsite Development Area and other portions of the Project site via the internal circulation system. Entrances and exits to and from parking and loading facilities would be marked with appropriate directional signage. All site access points and driveway aprons would be designed and constructed to provide adequate widths for public safety pursuant to local

[23] City of Perris. 2010. Appendix A, Proposed Perris Valley Airport Land Use Compatibility Plan. July.

requirements. In addition, the proposed Project would be subject to the City's Design Review process to ensure compliance with all local requirements, including emergency access.

Depending on the location and extent of an emergency, the surface streets proposed for improvement, such as Nichols Road, Pierce Street, and Baker Street would likely be utilized to route traffic from west of the Project site toward I-15. These roadways, together with I-15, would provide egress from the area.

To improve traffic circulation in the Project vicinity and create a second means of emergency access, proposed improvements under the Project include: (1) paving Baker Street along the frontage of the Onsite Development Area; (2) connecting Baker Street to Nichols Road; and (3) paving Pierce Street from Nichols Road southwest to Hoff Avenue. These improvements would be reviewed by the RCFD and Lake Elsinore Police Department under the City's general development review process. With proper site design and compliance with standard and emergency City access requirements, these proposed improvements would allow for evacuation, if necessary, during ongoing Project operations.

The City adopted the Emergency Preparedness Plan and Local Hazard Mitigation Plan, which provide guidance for residents, emergency responders, and businesses in the event a man-made or natural emergency occurs within or threatens the city.[24,25] In addition, a Fire Protection Plan (FPP) was prepared for the proposed Project that identifies appropriate fire protection methods/procedures in the event of a wildfire on or adjacent to the Project site.[26] The FPP is included as **Appendix P** of this Draft EIR. Refer to Section 4.20, Wildfire, of this Draft EIR for a detailed discussion of the contents of the FPP and its incorporation into the proposed Project.

An essential component of emergency evacuation plans is public preparedness in the event of an emergency in order to ensure effective implementation. As discussed in Section 4.20, **RCM FIRE-1,** as recommended in the FPP, would require the owner(s) of the proposed warehouse buildings to provide "Ready, Set, Go!" evacuation education, consistent with RCFD's current approach. Specifically, the property owner and/or property management company shall provide warehouse employees with informational brochures at time of onboarding employees, which will include an outreach and educational role to ensure fire safety measures detailed in the FPP have been implemented and development-wide "Ready, Set, Go!" plans prepared. With adherence to **RCM FIRE-1,** the proposed Project would not substantially impact existing evacuation plans in the city. Therefore, Project operation would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be **less than significant** with adherence to existing regulations that would be implemented by the City during the development review and permitting process.

[24] City of Lake Elsinore. Emergency Preparedness. Website: https://www.lake-elsinore.org/208/Emergency-Preparedness (accessed July 27, 2024).
[25] City of Lake Elsinore. 2017. Local Hazard Mitigation Plan. June.
[26] Dudek. 2025. Fire Protection Plan Baker Industrial Project. November.

Threshold 3.9.7: Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less Than Significant with Mitigation Incorporated. The Project site is located within a VHFHSZ in the LRA for the City of Lake Elsinore.[27] In addition, the City of Lake Elsinore General Plan identifies the Project site as being within a Very High Fire Hazard Zone.[28]

During construction of the proposed Project, RCFD and Cal/OSHA regulations would require the construction contractor to carefully store flammable materials in appropriate containers during Project construction, use construction equipment with spark arrestors, and immediately and completely clean up spills of flammable materials when they occur. In addition, as specified in the conditions of the site-specific FPP (Appendix P to this Draft EIR), prior to bringing lumber or combustible materials onto the Project site, improvements within the active development area must be in place (including utilities, operable fire hydrants, and approved temporary roadway surfaces), and construction-phase fuel modification zones (FMZs) must be established. Pursuant to **RCM FIRE-2** (refer to Section 3.20, Wildfire, of this Draft EIR), the proposed Project would be required to adhere to these conditions. Furthermore, the construction contractor and construction personnel would be familiar with the FPP and trained in emergency response, and fire suppression equipment specific to the construction site would be available and maintained on site for the duration of the construction period. Adherence to the FPP, as required under **RCM FIRE-2**, and existing regulations, including Cal/OSHA regulations and CCR Title 8, would ensure that potential impacts related to risk of loss, injury, or death involving wildland fires during Project construction are less than significant.

The Onsite Development Area would be developed with two warehouses totaling 1,000,451 square feet that would result in up to 483 permanent employees. Project design and implementation of utility improvements would be reviewed and approved by the City's Public Works Department as part of the proposed Project's approval process to ensure the proposed Project is compliant with all applicable fire codes, design standards, and regulations. Pursuant to **RCM PS-1** (refer to Section 3.15, Public Services, of this Draft EIR), the proposed Project would be required to adopt fire protection measures in accordance with City ordinances and other applicable fire protection standards, including water supply/fire flow, fire sprinkler systems, and fire personnel access.

To further minimize the risk of structural loss and human harm in the event of a wildfire, **RCM FIRE-2** would require adherence to the Project-specific FPP, including the site design recommendations to ensure the proposed structures are ignition-resistant and accessible by fire response personnel. Relevant Project design features include Type 1 (Fire Resistive) tilt-up construction materials, installation of a National Fire Protection Association (NFPA) 13 commercial interior fire sprinkler system, and minimum 100-foot on-site and off-site equivalent fuel modification. The internal roads, roadways along the Project perimeter, and parking areas would also reduce fire risk. Furthermore, the Project site would be developed in accordance with applicable California Building Code (CBC), CFC, and Lake Elsinore Municipal Code regulations and the FPP, including requiring all on-site structured

[27] California Department of Forestry and Fire Protection (CAL FIRE). Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessedJuly26,2025).

[28] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan. Chapter 3.0, Public Safety and Welfare, Figure 3.1, Wildfire Susceptibility. December 13.

to be "fire-hardened." Fire-hardening means taking precautions to reduce a structure's susceptibility to burning in a wildfire. Examples of actions that are taken to fire-harden structures include constructing buildings with fire-resistant materials (e.g., concrete buildings and metal roofs) and clearing vegetation around the buildings and/or boundary of the Project site to create a defensible space. Implementation of these Project features not only minimizes or prevents wildfire from transitioning onto the Project site but also minimizes or prevents on-site fires from transitioning into adjacent wildlands.

Pursuant to **RCM FIRE-2**, the proposed Project includes irrigated managed landscaping consistent with the applicable FMZ requirements specified in the FPP (Appendix P to this Draft EIR). Pursuant to **MM FIRE-1**, annual inspections would ensure that FMZs on the Project site are properly maintained to function properly in the event of a wildfire. Therefore, because of the irrigation and inspections, vegetation on the Project site has a low likelihood of being a fire source or spreading wildfire originating from the Project site vicinity.

With adherence to **RCMs FIRE-2** and **PS-1** and implementation of **MM FIRE-1,** the proposed Project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires, and impacts would be **less than significant with mitigation incorporated.**

3.9.7 Level of Significance Prior to Mitigation

Prior to mitigation, impacts related to significant hazards to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, as well as interference with an adopted emergency response plan or emergency evacuation plan and exposure of people or structures to a significant risk of loss, injury, or death involving wildland fires, would be potentially significant.

3.9.8 Regulatory Compliance Measures and Mitigation Measures

The following RCMs are applicable to the proposed Project.

RCM HAZ-1 **Hazardous Materials Business Plan.** Prior to the issuance of a certificate of occupancy, the warehouse tenant(s)/end-user(s) within the Onsite Development Area that would handle hazardous materials and substances in reportable quantities as defined by California Health and Safety Code Section 25507(a) (1) through (8) shall submit proof to the City of Lake Elsinore Building and Safety Department that they have submitted a Hazardous Materials Business Plan (HMBP) via the California Environmental Reporting System (CERS). At minimum, the HMBP shall include facility information, a hazardous material inventory (including a site map/plan), and emergency response and training programs for employees. This measure shall be implemented to the satisfaction of the City of Lake Elsinore Director of Building and Safety, or designee.

RCM WQ-1 **Construction General Permit and Chapter 14.08 of the City of Lake Elsinore Municipal Code.** *(See Section 3.10, Hydrology and Water Quality)*

RCM WQ-2 **Groundwater Discharge Permit.** *(See Section 3.10, Hydrology and Water Quality)*

RCM WQ-3 **Riverside County MS4 Permit.** *(See Section 3.10, Hydrology and Water Quality)*

RCM WQ-4 **Industrial General Permit.** *(See Section 3.10, Hydrology and Water Quality)*

RCM PS-1 **Fire Protection Water Supplies/Fire Flow.** *(See Section 3.15, Public Services)*

RCM FIRE-1 **Evacuation Education and Preparedness.** *(See Section 3.20, Wildfire)*

RCM FIRE-2 **Adherence to the Fire Protection Plan.** *(See Section 3.20, Wildfire)*

The following mitigation measures would be implemented as part of the proposed Project.

MM HAZ-1 **Asbestos Abatement.** In the event subsurface irrigation pipes, septic facilities, or any other on-site features or materials suspected to contain asbestos are encountered during ground-disturbing activities, excavation within 60 feet of the material shall be halted, and the Project Applicant shall retain a qualified California Division of Occupational Safety and Health (Cal/OSHA) Certified Site Surveillance Technician to evaluate whether the feature(s) or material(s) warrant further assessment or remediation pursuant to Title 8, California Code of Regulations (CCR) Section 1529. Pipes and other features shall not be crushed until it is determined that they do not contain asbestos. In the event the City, through consultation with the Cal/OSHA Certified Site Surveillance Technician, determines the feature(s) or material(s) is not hazardous, no further remedial action is required, and the feature(s) or material(s) shall be disposed of in accordance with the Riverside County Department of Environmental Health (DEH).

In the event the feature(s) or material(s) is deemed to contain asbestos, the Project Applicant shall retain a Certified Asbestos Consultant to provide a construction and demolition plan with disposal tickets from a Riverside County DEH Hazardous Materials Branch-approved disposal facility. As required, the Certified Asbestos Consultant shall prepare and submit Asbestos Notification to the South Coast Air Quality Management District (SCAQMD) for air clearances. The Certified Asbestos Consultant shall prepare an asbestos disposal report for City's review prior to final disposal. This measure shall be implemented to the satisfaction of the City of Lake Elsinore Community Development Director, or designee, and/or Building and Safety Division Director, or designee.

MM HAZ-2 **Unanticipated Hazardous Materials.** Should grubbing, grading, or any other ground-disturbing activities reveal any discolored soils, noxious odors, and/or other buried objects/debris, the Project Applicant shall retain a consultant

qualified under American Society for Testing and Materials (ASTM) International Standard E1527-13 to evaluate the conditions and provide specific procedures and recommendations that shall be adhered to during construction activities. The consultant will develop these procedures and recommendations based on the findings from the soil investigation and in accordance with applicable legal standards that are outlined below. If the qualified consultant determines the conditions are not hazardous, no further remedial action is required, and the material shall be disposed of in accordance with the Riverside County DEH.

In the event the material/condition is deemed potentially hazardous, the qualified consultant shall conduct a soil investigation on the project site to assess the potential presence of hazardous materials. The soil investigation shall meet or exceed the standards of the California Department of Food and Agriculture and comply with the Maximum Residue Limits established in 40 Code of Federal Regulations 180 for any pesticide chemicals identified on the site. Construction may not proceed until the extent and nature of the suspect material is determined by qualified personnel and in consultation with appropriate City staff.

The removal and/or disposal of any hazardous material shall be conducted by a Cal/OSHA-licensed Hazardous Materials Substances Removal contractor in accordance with all applicable local, State, and federal standards to the degree that adequate public health and safety standards are maintained, to the reasonable satisfaction of the City. If warranted, the property owner may enter into a Voluntary Cleanup Plan (VCP) with the California Department of Toxic Substances Control (DTSC) to coordinate remediation of the site. If a VCP is established, the City shall enter into a memorandum of agreement with the DTSC to support and strengthen efforts to achieve protective cleanups under State oversight. The City shall ensure advanced payment of the cleanups is made by the City and/or Project Applicant and the City and/or Project Applicant is committed to paying all subsequent VCP costs, including those associated with DTSC's oversight. The VCP shall be managed by a Hazardous Substances Scientist or Hazardous Substances Engineer and shall include details about site conditions, proposed land use, and potential community concerns. In the VCP, the DTSC retains its authority to take enforcement action if, during the investigation or cleanup, it determines the site presents a serious health threat and proper and timely action is not otherwise being taken. When remediation is complete, the DTSC shall issue either a site certification of completion or a "No Further Action" letter, depending on the Project circumstances, which means the property is now ready for productive economic use.

MM FIRE-1 **Fuel Modification Zone Maintenance.** *(See Section 3.20, Wildfire)*

3.9.9 Level of Significance after Mitigation

With adherence to **RCMs HAZ-1** and **WQ-1** through **WQ-4**, and implementation of **MMs HAZ-1** and **HAZ-2,** any unanticipated encounters with potentially hazardous materials on the Project site would not create a significant hazard to the public or the environment during disposal of hazardous materials. The use, storage, transport, and disposal of hazardous materials during construction and operation would not cause significant hazards to the public or the environment through accidental releases of hazardous materials, and impacts would be **less than significant with mitigation incorporated**.

3.9.10 Cumulative Impacts

The purpose of this section is to evaluate any additional incremental impact that the proposed Project may cause in combination with impacts of recently approved and proposed projects in Lake Elsinore. The geographic scope of impacts associated with hazardous materials generated or released on any site generally encompasses that site and areas immediately adjacent to or within a 1-mile radius.[29] Regulatory resources did not identify any property within 1 mile of the proposed Project to represent RECs, HRECs, or CRECs to the Project site.[30]

Construction and operation/occupation of past, present, and future projects, including the cumulative projects listed in Chapter 3 and shown on Figure 3-1, would increase the regional transport, storage, use, and disposal of hazardous materials and petroleum products (e.g., diesel fuel, lubricants, paints, and solvents), as well as cement products containing strong basic or acidic chemicals. For the proposed Project, impacts related to hazardous materials during construction would be reduced to less than significant through adherence with **RCMs WQ-1** through **WQ-4** to ensure construction contractors maintain equipment and supplies on site for containing and cleaning up hazardous materials spills and would train workers in such containment and cleanup and implementation of **MMs HAZ-1** and **HAZ-2** to ensure any unanticipated hazardous materials encountered during construction are managed and disposed of in accordance with regulatory protocols. Impacts related to hazardous materials during operation would remain less than significant through adherence with **RCM HAZ-1,** requiring preparation of an HMBP via CERS. Such plans would be reviewed by the Riverside County DEH to ensure the appropriate disclosure, reporting, use, transport, and/or storage of hazardous materials. Although some cumulative projects also have potential impacts associated with hazardous materials, the environmental concerns associated with hazardous materials are site specific. Similar to the proposed Project, any cumulative project for which hazardous materials are present during construction and/or operation would be required to implement best practices and/or mitigation to ensure hazardous materials are managed and disposed of in accordance with regulatory protocols. Accordingly, any future cumulative project must adhere to the appropriate and applicable regulations established by the USEPA, USDOT, OSHA, Cal/OSHA, and Riverside County DEH regarding the manufacture, transport, storage, use, or disposal of hazardous materials; therefore, no cumulatively significant hazardous materials impacts would occur.

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29 EnviroApplications, Inc. 2023. *Phase I Environmental Site Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530*. Attachment 3: Government Agency Database Search Report. August 4. Appendix I.

30 Ibid. Page 23.

During construction and operation of the Project, adequate access for emergency vehicles would be required to be maintained. As prescribed in Section 4.17, Transportation, of this EIR, **RCM TRA-1** requires the construction contractor to implement a TMP to manage temporary lane closures along Nichols Road, Pierce Street, and Baker Street so as not to substantially impair these roadways' capacities to accommodate Project and community evacuation and simultaneous emergency access. The proposed improvements to Nichols Road, Pierce Street, and Baker Street would improve circulation within and around the site by providing paved and/or widened streets with improved connectivity to other existing roadways in the Project vicinity that could be used for emergency access and evacuation. Similarly, cumulative development would be required to accommodate emergency access along and/or through their respective sites. The City would require any such roadway improvements to conform to established emergency access requirements established by the City and RCFD, applicable provisions of the applicable CFC and CBC, and/or other necessary fire authority requirements. Therefore, no cumulatively significant impacts related to emergency access/evacuation would occur.

Future projects within Lake Elsinore could include development on lands within fire hazard severity zones or within a wildland-urban interface. Although development of such projects could subject people and structures to wildfire hazards, all projects approved and developed within fire hazard severity zones would be required to comply with CFC Chapter 49, "Requirements for Wildland-Urban Interface Fire Area," and CBC Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure." All projects in fire hazard zones would be required to incorporate fire-retardant roofs per RCFD requirements. Additionally, projects in fire hazard severity zones would be required to remove flammable vegetation within certain distances of structures pursuant to RCFD requirements, California Public Resources Code Sections 4291 et seq., and CFC Sections 4906 and 4907. As detailed in **RCM PS-1** and **RCM-FIRE-2**, the proposed Project would be required to adopt fire protection measures in accordance with City ordinances, the FPP, and other applicable fire protection standards, including water supply/fire flow, fire sprinkler systems, and fire personnel access that would be implemented by this Project and other future projects in the vicinity of the proposed Project. Additionally, as detailed in **RCM FIRE-1**, the proposed Project and other projects within fire hazard severity zones would require the owner(s) to provide "Ready, Set, Go!" evacuation education, consistent with RCFD's current approach. Upon compliance with existing regulations, the potential cumulative effect of development in these areas would be less than significant, and the proposed Project's impact would not be cumulatively considerable.

Therefore, when considered in conjunction with past, present, and future projects, impacts pertaining to hazards and hazardous materials, would be **less than cumulatively considerable with** adherence to **RCMs HAZ-1, WQ-1** through **WQ-4**, **TRA-1, PS-1, FIRE-1,** and **FIRE-2** and implementation of **MMs HAZ-1, HAZ-2,** and **FIRE-1.**

3.10 HYDROLOGY AND WATER QUALITY

This section of the Draft Environmental Impact Report (EIR) discusses the existing hydrologic setting and provides an analysis of the potential impacts to hydrology and water quality anticipated with implementation of the proposed Project. The analysis in this section is based, in part, on the information provided in the *Preliminary Drainage Report*[1], the *Project-Specific Water Quality Management Plan* (WQMP),[2] the *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California* (Geotechnical Evaluation)[3], and the *Baker Street Water Supply Assessment* (WSA).[4] These reports are included as Appendices J-1, J-2, G-1, and J-3 to this Draft EIR, respectively.

Data from the City of Lake Elsinore (City) General Plan, City of Lake Elsinore General Plan EIR, City of Lake Elsinore Municipal Code, and State Water Resources Control Board (SWRCB) are also incorporated into this section.

3.10.1 Scoping Process

Potential impacts related to hydrology and water quality were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received two comment letters in response to the Notice of Preparation (NOP) circulated between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to hydrology and water quality. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to hydrology and water quality included comments from the following:

- Jefrey Ong, July 10, 2024, expressing concern regarding strain on existing infrastructure with implementation of the proposed Project.

- The California Department of Fish and Wildlife (CDFW), July 14, 2024, requesting compliance with the Lake and Streambed Alteration program.

3.10.2 Methodology

The proposed Project's impacts to hydrology and water quality are evaluated based on the proposed Project's adherence to local, regional, State, and federal standards; the proposed land uses and Project design; changes in pre- and post-Project stormwater flows; and proposed best management practices (BMPs) for control of surface runoff and reduction of pollutants in stormwater runoff.

1 KWC Engineers. 2024. *Preliminary Drainage Report.* December. Revised June 2025.
2 KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial.* August 14. Revised March 11, 2025.
3 LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California.* January 31.
4 Carollo Engineers, Inc. 2025. *Baker Street Water Supply Assessment.* April.

3.10.3 Existing Environmental Setting

The proposed Project is in the city of Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within the region and the Project site as it relates to hydrology and water quality.

The 140.04-acre Project site consists of four elements: a 65.81-acre Onsite Development Area, within which the proposed warehouse buildings and associated parking would be developed; a 37.86-acre Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street and the realignment of Baker Street to Nichols Road; a 33.65-acre Restoration Area to be used for future conservation and restoration activities; and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

3.10.3.1 Surface Waters and On-Site Drainage

The Project site is within the Santa Ana River Watershed, which ultimately drains to the Santa Ana River. The primary natural surface waters in the city include Lake Elsinore, the San Jacinto River, and Temescal Creek.[5] The San Jacinto River originates in the San Jacinto Mountains and flows through the San Bernardino National Forest into Lake Elsinore, located approximately 1.1 miles south of the Project site.

The drainage patterns in the city are divided into three basins: the Temescal, Lake Elsinore, and Santa Margarita areas. According to the City's General Plan EIR, the Project site is within the Temescal Basin Area.[6]

The City and the Project site are within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). For planning purposes, the Santa Ana RWQCB uses a watershed classification that divides surface waters into hydrologic units (HUs), hydrologic areas (HAs), and hydrologic subareas (HSAs). As designated by the Santa Ana RWQCB, the Project site is within the Santa Ana Hydrologic Region, the Santa Ana River HU, the Lake Matthews HA, and the Terra Cotta HSA.[7]

The Project site is irregular in shape and generally bounded by undeveloped land in all directions. The Project site includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a residence are located outside of

[5] City of Lake Elsinore. 2011. General Plan Update, Draft Program EIR, Section 3.9, Hydrology and Water Quality. August.

[6] City of Lake Elsinore. 2011. General Plan Update, Draft Program EIR, Section 3.9, Hydrology and Water Quality. August.

[7] Santa Ana Regional Water Quality Control Board. 1995. *The Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin,* Chapter 1, Introduction. January 24. Updated June 2019 to include approved amendments.

and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses are outside of the Project site limits. The Project site has a history of limited agriculture use. Vegetation on the Project site consists of species that are characteristic of the Coastal Sage Brush Community, including California sagebrush, buckwheat, black sage, white sage, lilac, datura, and chollas, as well as introduced weeds and landscaping plants such as tumbleweed and eucalyptus. Elevations within the Project area range approximately between 1,260 feet and 1,400 feet above mean sea level (amsl), inclining gradually to the north and the southwest, with the lowest elevations in the central portion. A wetland area associated with Temescal Creek is located in the Restoration Area between the Project site and Collier Avenue to the east, and vernal pools are located along the north ROW of Baker Street.

Under existing conditions, stormwater from the entire Project site, including the Onsite Development Area, Offsite Improvement Area, Restoration Area, and Construction/Improvements Buffer, drains northeast and discharges into Temescal Creek, which is directly northeast of the Project site. Temescal Creek is a major tributary to the Santa Ana River,[8] located approximately 20 miles northwest of the Project site.[9]

3.10.3.2 Groundwater Basin

The City and the Project site are within the boundaries of the Elsinore Valley Subbasin of the Elsinore Groundwater Basin.[10] The Elsinore Groundwater Basin underlies the Elsinore Valley in western Riverside County. The surface area of the Elsinore Groundwater Basin is approximately 25,700 acres (40.2 square miles) and is bounded on the southwest by the Santa Ana and Elsinore mountains along the Willard fault and bounded on the southeast by shallow bedrock high with a surface water divide that separates the Elsinore Groundwater Basin from the Temecula-Murrieta Groundwater Basin located further south. The Elsinore Groundwater Basin is bounded on the northwest by the Temescal Subbasin of the Upper Santa Ana River Valley Groundwater Basin at a constriction in Temescal Creek, and on the northeast by non-water bearing rocks of the Peninsular Ranges along the Glen Ivy fault.[11]

The Elsinore Groundwater Basin is primarily supplied by the infiltration of precipitation in the surrounding watershed. Other sources of recharge include infiltration along the San Jacinto River channel upstream of Lake Elsinore and agricultural and residential return flows. Municipal pumping for potable water is the only major outflow from the Elsinore Groundwater Basin. Some additional groundwater pumping is performed as necessary to maintain the elevation of Lake Elsinore at 1,240 feet amsl.[12]

Under natural conditions, groundwater generally flows from the northwest to southeast beneath Lake Elsinore. However, because faults cutting the sediments impede groundwater movement,

8 Riverside County Flood Control District. 2015. Middle Santa Ana River Watershed Fact Sheet. April 15.

9 City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR,* Section 3.9, Hydrology and Water Quality. August.

10 California Department of Water Resources. Groundwater Basin Boundary Assessment Tool. Website: https://gis.water.ca.gov/app/bbat/ (accessed December 2024).

11 California Department of Water Resources. 2006. Elsinore Groundwater Basin Bulletin 118. January 20.

12 City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR,* Section 3.9, Hydrology and Water Quality. August.

groundwater flow is predominantly contained within fault blocks in the basin. The difference between groundwater levels on the northwest side and the southeast side is more than 300 feet. Depth to water current ranges from about 250 feet in the northwest to more than 600 feet in the southeast.[13]

In 1975, the calculated groundwater in storage was estimated to be approximately 1,000,000 acre-feet, and in 2001, the estimated groundwater storage capacity of the Elsinore Groundwater Basin was 1,400,000 acre-feet.[14] The Elsinore Valley Municipal Water District (EVMWD) Groundwater Management Plan[15] includes a groundwater budget analysis of the Elsinore Groundwater Basin for 1990–2001, which indicates that the basin experienced an average annual deficit of approximately 1,800 acre-feet per year (AFY) over the 11-year period studied. Eight of the 11 years analyzed had a deficit, while the remaining 3 years corresponded to above-average annual precipitation totals. In addition, water levels in wells in the southern portion of the basin dropped more than 200 feet in the same 11-year period, providing further evidence of a groundwater overdraft condition. Continuing overdraft of the basin may lead to ground subsidence as soils compact over long periods of time, although no clear evidence of subsidence has currently been identified around Lake Elsinore.[16]

According to the Geotechnical Evaluation prepared for the proposed Project,[17] groundwater was encountered at the Project site at depths between 11 and 45 feet below existing grade. Based on nearby groundwater wells, elevation of the nearby creek bottom approximately 750 feet northeast of the Project site, and groundwater data gathered during our subsurface evaluation, historic high groundwater is estimated to be approximately 10 feet below existing grade.

Seasonal fluctuations of groundwater elevations are expected over time. In general, groundwater levels fluctuate with the seasons, and local zones of perched groundwater may be present within the near-surface deposits due to local seepage or during rainy seasons. In addition, local perched groundwater conditions or surface seepage may occur once the Project site is developed, and landscape irrigation commences.

3.10.3.3 Surface Water Quality

Receiving waters from the Project site include Temescal Creek (Reaches 5 and 6), Lake Elsinore, and the Santa Ana River (Reach 3). Temescal Creek is listed on the most recent United States Environmental Protection Agency (USEPA) approved 303(d) list (2024) as impaired for copper, iron, malathion, and oil/grease; Lake Elsinore is listed as impaired for dichlorodiphenyltrichloroethane (DDT), polychlorinated biphenyls (PCBs), toxicity, microcystins, ammonia, nutrients, organic

[13] Department of Water Resources. 2006. Elsinore Groundwater Basin Bulletin 118. January 20.
[14] Ibid.
[15] Elsinore Valley Municipal Water District (EVMWD). 2005. Groundwater Management Plan.
[16] City of Lake Elsinore. 2011. General Plan Update, Draft Program EIR, Section 3.9, Hydrology and Water Quality. August.
[17] LGC Geotechnical, Inc. 2024. Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California. January 31.

enrichment/low dissolved oxygen, and dissolved oxygen; and the Santa Ana River (Reach 3) is listed as impaired for copper, lead, indictor bacteria, bifenthrin, pyrethroids, and toxicity.[18]

3.10.3.4 Groundwater Quality

The EVMWD Groundwater Management Plan presents an analysis of groundwater quality at a group of wells within the Elsinore Groundwater Basin. Groundwater characteristics within the Elsinore Groundwater Basin were identified based on wells used in the Groundwater Management Plan, including total dissolved solids, nitrates, and sulfates being typically found in the highest concentrations at the Lincoln Street Well, located northwest of Lake Elsinore and approximately 2 miles southwest of the Project site, while the lowest concentrations were found in the Olive Street Well, located southeast of Lake Elsinore and approximately 3 miles southeast of the Project site. In addition, arsenic concentrations were found to be highest in the deeper wells. Pollutant concentrations could have been caused by the historic agricultural use in the area north of Lake Elsinore.[19]

In addition, according to the California Department of Water Resources (DWR), groundwater northeast of Lake Elsinore is characterized by calcium sulfate, whereas groundwater southeast of the lake is characterized as calcium bicarbonate. Groundwater in the central part of the basin is characterized by sodium sulfate-bicarbonate.[20]

3.10.3.5 Floodplains

According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 06065C2028G (effective August 28, 2008), approximately 78 percent of the Project site is mapped as within Zone X (area of minimal flood hazard and area with 0.2 percent annual chance of flood hazard), approximately 16 percent is within Zone A (1 percent annual chance of flood hazard), and approximately 6 percent is within Zone AE (regulatory floodway).[21] Figure 3.10-1: Flood Hazard Zones depicts the flood hazard zones at the Project site.

3.10.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.10.4.1 Federal Regulations

Clean Water Act. In 1972, the Federal Water Pollution Control Act (now referred to as the Clean Water Act [CWA]) was amended to require that the discharge of pollutants into waters of the United States from any point source be effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, the CWA was again amended to

[18] State Water Resources Control Board. California 2024 Integrated Report (303(d) List/305(b) Report), https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html).

[19] City of Lake Elsinore. 2011. General Plan Update, Draft Program EIR, Section 3.9, Hydrology and Water Quality. August.

[20] Department of Water Resources. 2006. Elsinore Groundwater Basin Bulletin 118. January 20.

[21] Federal Emergency Management Agency. 2008. Flood Insurance Rate Map (FIRM) No. 06065C2028G. August 28.

require that the USEPA establish regulations for the permitting of stormwater discharges (as a point source) by municipal and industrial facilities and construction activities under the NPDES permit program. The regulations require that Municipal Separate Storm Sewer System (MS4) discharges to surface waters be regulated by an NPDES permit.

The CWA requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents (e.g., lead, suspended sediment, and fecal coliform bacteria) or narrative statements that represent the quality of water that support a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body. Direct discharges of pollutants into waters of the United States are not allowed except in accordance with the NPDES program established in Section 402 of the CWA.

Clean Water Act, Section 303, List of Impaired Water Bodies. The SWRCB, in compliance with Section 303(d) of the CWA, prepares a list of impaired and threatened waters (e.g., stream/river segments, lakes). States are required to submit their list for USEPA approval every 2 years. For each water body on the list, the SWRCB identifies the pollutant causing the impairment, when known. In addition, the SWRCB assigns a priority for development of TMDLs based on the severity of the pollution and the sensitivity of the uses for which the waters are being used, among other factors.

In general, once a water body has been added to a state's list of impaired waters, it remains on the list until the state develops a TMDL and the USEPA approves it. USEPA reporting guidance provides guidelines to keep track of a state's water bodies, from listing as impaired to meeting water quality standards. This tracking system contains a running account of all of the state's water bodies and categorizes each based on the attainment status, which was published as the 2024 California Integrated Report. The 2024 California Integrated Report was partially approved and partially disapproved by the USEPA on December 13, 2024. The USEPA approved the majority of the 303(d) list but identified 53 water body pollutant combinations it is considering adding to the 303(d) list. The

2024 California Integrated Report is the current integrated report except for the 53 water body-pollutant combinations in review by the USEPA.[22]

National Flood Insurance Act. Congress acted to reduce the costs of flood disaster relief by passing the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973. The intent of these acts was to reduce the need for large, publicly funded flood control structures and disaster relief efforts by restricting development in floodplains. FEMA administers the National Flood Insurance Program (NFIP) to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in a floodplain. FEMA issues FIRMs of communities participating in the NFIP. These maps delineate flood hazard zones in the community. If a proposed project would affect the hydrologic or hydraulic characteristics of a flooding source and result in the modification of an existing regulatory floodway, the effective Base Flood Elevations, or the Special Flood Hazard Area, FEMA may comment on the project in the form of a Conditional Letter of Map Revision (CLOMR). The letter does not revise an effective NFIP map but indicates whether the project, if built as proposed, would be recognized by FEMA. FEMA will issue a Letter of Map Revision (LOMR) to officially revise the current NFIP map to show changes to floodplains, regulatory floodways, or flood elevations. Because an LOMR officially revises the effective FIRM, the flood hazard updates shown are used to rate flood insurance policies and enforce flood insurance and development requirements.

3.10.4.2 State Regulations

California Fish and Game Code Section 1602. California Fish and Game Code Section 1602 requires any person, State, local governmental agency, or public utility to notify the CDFW prior to beginning any activity that may do one or more of the following:

- Divert or obstruct the natural flow of any river, stream, or lake;
- Change the bed, channel, or bank of any river, stream, or lake;
- Use material from any river, stream, or lake; or
- Deposit or dispose of material into any river, stream, or lake.

If the project activity may substantially adversely affect fish and wildlife resources, CDFW requires the project to obtain a Lake or Streambed Alteration Agreement.

Porter-Cologne Water Quality Control Act of 1970. The CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate

[22] State Water Resources Control Board. 2024 California Integrated Report. Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html (accessed April 2025).

discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Each RWQCB must formulate and adopt a water quality plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water plans and policies. The Porter-Cologne Act also provides that an RWQCB may include a regional plan with water discharge prohibitions applicable to conditions, areas, or types of waste particular to that region. The city, including the Project site, is within the jurisdictional boundaries of the Santa Ana RWQCB (Region 8).

California Toxics Rule. As stated previously, because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the CTR. The CTR provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The CTR is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the CTR criteria do not apply directly to discharges of stormwater runoff, they are utilized as benchmarks for toxics in urban runoff and to evaluate the potential ecological impacts of stormwater runoff to receiving waters. The CTR establishes both acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without negative effects. Chronic criteria provide benchmarks for an extended period of time (i.e., 4 days or more) without negative effects. The acute CTR criteria have a shorter relevant averaging period (less than 4 days) and provide a more appropriate benchmark for comparison for stormwater flows.

CTR criteria apply to the receiving water body and are calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents (including copper, lead, and zinc) are more likely to be complexed (bound) with components in the water column. This in turn reduces the bioavailability and the resulting potential toxicity of these metals.

General Construction Activity Stormwater Permit. The *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002* (Construction General Permit),[23] adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least 1 acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities.

[23] State Water Resources Control Board. 2022. *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002.* September 8. Effective September 1, 2023.

The Construction General Permit requires that all developers of land where construction activities will occur over more than 1 acre do the following:

- Complete a risk assessment to determine pollution prevention requirements pursuant to the three risk levels established in the Construction General Permit;
- Eliminate or reduce nonstormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards, as described in the Construction General Permit;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction General Permit, a project applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include a:

- Notice of Intent (NOI);
- Risk assessment;
- Post-construction calculations (when applicable)
- Site map;
- SWPPP;
- Annual fee; and
- Signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

Sustainable Groundwater Management Act. The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that Governor Jerry Brown signed into California State law in September 2014. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for years to come.

The SGMA requires governments and water agencies of high- and medium-priority basins to prevent overdrafts of groundwater basins. The SGMA requires the formation of local groundwater sustainability agencies (GSAs) that are required to adopt Groundwater Sustainability Plans (GSPs) to manage the sustainability of the groundwater basins.

3.10.4.3 Regional Regulations

Water Quality Control Plans (Basin Plans). The Santa Ana RWQCB has adopted a Basin Plan for its region of responsibility that delineates water resource area boundaries based on hydrological features. For the purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the surface waters and groundwater management zones described in the Basin Plan. Once beneficial uses are designated, appropriate water quality objectives are established and programs that maintain or enhance water quality can be implemented to ensure the protection of beneficial uses.

The beneficial uses of surface receiving waters in the Project area (i.e., Temescal Creek [Reaches 5 and 6], Lake Elsinore, and the Santa Ana River [Reach 3]) are provided in Table 3.10.A: Beneficial Uses of Receiving Waters.

Table 3.10.A: Beneficial Uses of Receiving Waters

Beneficial Use	Temescal Creek (Reach 5)	Temescal Creek (Reach 6)	Lake Elsinore	Santa Ana River (Reach 3)
MUN	+	+	+	+
AGR	X			X
GWR	X	I		X
REC1	X	I	X	X
REC2	X	I	X	X
COMM			X	
WARM	X	I	X	X
WILD	X	I	X	X
RARE	X		X	X
SPWN				X

Source: Santa Ana Regional Water Quality Control Board, Water Quality Control Plan, Santa Ana River Basin (8), Table 3-1 Beneficial Uses (June 24, 1995; updated June 2019 to include approved amendments).

AGR = Agricultural Supply
COMM = Commercial and Sportfishing
GWR = Groundwater Recharge
MUN = Municipal and Domestic Supply
RARE = Rare, Threatened or Endangered Species
REC1 = Water Contact Recreation (Primary Contact Recreation)
+ = Excepted from MUN
X = Existing or Potential Beneficial Use
I = Intermittent beneficial use
REC2 = Noncontact Water Recreation (Secondary Contact Recreation)
SPWN = Spawning, Reproduction and Development
WARM = Warm Freshwater Habitat
WILD = Wildlife Habitat

Basin Plans also establish implementation programs to achieve water quality objectives to protect beneficial uses and require monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Basin Plans have established narrative and numeric water quality objectives for inland surface streams and groundwater. If water quality objectives are exceeded, the RWQCBs can use their regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. Relevant

surface water quality objectives for all inland surface waters and groundwater under the jurisdiction of the Santa Ana RWQCB that are applicable to the receiving waters for the Project site are shown in Table 3.10.B: Surface Water Quality Objectives for Inland Surface Waters and Table 3.10.C: Groundwater Quality Objectives, respectively.

Table 3.10.B: Surface Water Quality Objectives for Inland Surface Waters

<table>
<tr><th>Constituent</th><th>Basin Plan Objective</th></tr>
<tr><td colspan="2">Inland surface water communities and populations, including vertebrate, invertebrate, and plant species, shall not be degraded as a result of the discharge of waste. Degradation is damage to an aquatic community or population with the result that a balanced community no longer exists. A balanced community is one that (1) is diverse; (2) has the ability to sustain itself through cyclic seasonal changes; (3) includes necessary food chain species; and (4) is not dominated by pollution-tolerant species unless that domination is caused by physical habitat limitations. A balanced community also: (5) may include historically introduced nonnative species, but (6) does not include species present because best available technology has not been implemented, (7) because site-specific objectives have been adopted, or (8) because of thermal discharges.</td></tr>
<tr><td>Algae</td><td>Waste discharges shall not contribute to excessive algal growth in inland surface receiving waters.</td></tr>
<tr><td>Ammonia, Un-ionized</td><td>Calculated numerical UIA-N objectives, as well as corresponding total ammonia nitrogen concentration for various pH and temperature conditions, are shown in Basin Plan Tables 4-2 and 4-3.</td></tr>
<tr><td>Site-specific Un-ionized Ammonia Objective for the Santa Ana River System</td><td>To prevent chronic toxicity to aquatic life in the Santa Ana River (Reaches 2, 3, and 4), Chino Creek, Mill Creek (Prado Area), Temescal Creek, and San Timoteo Creek, discharges to these water bodies shall not cause the concentration of un-ionized ammonia (as nitrogen) to exceed 0.098 mg/L (NH_3-N) as a 4-day average.</td></tr>
<tr><td>Boron</td><td>Boron concentrations shall not exceed 0.75 mg/L in inland surface waters of the region as a result of controllable water quality factors.</td></tr>
<tr><td>Chemical Oxygen Demand</td><td>Waste discharges shall not result in increases in chemical oxygen demand levels in inland surface waters that exceed the values shown in Basin Plan Table 4-1 or that adversely affect beneficial uses.</td></tr>
<tr><td>Chloride</td><td>The chloride objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.</td></tr>
<tr><td>Chlorine, Residual</td><td>To protect aquatic life, the chlorine residual in wastewater discharged to inland surface waters shall not exceed 0.1 micrograms per liter (ug/L).</td></tr>
<tr><td>Color</td><td>Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses. The natural color of fish, shellfish, or other inland surface water resources used for human consumption shall not be impaired.</td></tr>
<tr><td>Dissolved Solids, Total (Total Filtrable Residue)</td><td>The dissolved mineral content of the waters of the region, as measured by the total dissolved solids test (“Standard Methods for the Examination of Water and Wastewater, 16th Ed.,” 1985: 209B [180°C], p. 95) shall not exceed the specific objectives listed in Basin Plan Table 4-1 as a result of controllable water quality factors.</td></tr>
<tr><td>Filtrable Residue, Total</td><td>See Dissolved Solids, Total.</td></tr>
<tr><td>Floatables</td><td>Waste discharges shall not contain floating materials, including solids, liquids, foam, or scum, that cause a nuisance or adversely affect beneficial uses.</td></tr>
<tr><td>Fluoride</td><td>Fluoride concentrations shall not exceed values specified below in inland surface waters designated MUN as a result of controllable water quality factors.
<table>
<tr><th colspan="2">Annual Average Maximum Optimum Fluoride</th></tr>
<tr><th>Daily Air Temperature (°C)</th><th>Concentration (mg/L)</th></tr>
<tr><td>12.0 and below</td><td>1.2</td></tr>
<tr><td>12.1 to 14.6</td><td>1.1</td></tr>
<tr><td>14.7 to 17.6</td><td>1.0</td></tr>
<tr><td>17.7 to 21.4</td><td>0.9</td></tr>
<tr><td>21.5 to 26.2</td><td>0.8</td></tr>
<tr><td>26.3 to 32.5</td><td>0.7</td></tr>
</table></td></tr>
</table>

Table 3.10.B: Surface Water Quality Objectives for Inland Surface Waters

Constituent	Basin Plan Objective
Hardness (as $CaCO_3$)	The objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors. If no hardness objective is listed in Basin Plan Table 4-1, the hardness of receiving waters used for MUN shall not be increased as a result of waste discharges to levels that adversely affect beneficial uses.
Inorganic Nitrogen, Total	See Nitrogen, Total Inorganic.
Metals	SSO for Cadmium: Cd SSO = $0.85[e^{[0.7852*ln(TH)-3.490]}]$ SSO for Copper: CU SSO = $0.85[e^{[0.8545*ln(TH)-1.465]}]$ SSO for Lead: Cd Pb = $0.25[e^{[1.273*ln(TH)-3.958]}]$
MBAS	MBAS concentrations shall not exceed 0.05 mg/L in inland waters designated MUN as a result of controllable water quality factors.
Nitrate	Nitrate-nitrogen concentrations shall not exceed 45 mg/L (as NO_3) or 10 mg/L (as N) in inland surface waters designated MUN as a result of controllable water quality factors.
Nitrogen, Total Inorganic	The objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.
Oil and Grease	Waste discharges shall not result in deposition of oil, grease, wax, or other material in concentrations that result in a visible film or in coating objects in the water, or that cause a nuisance or adversely affect beneficial uses.
Oxygen, Dissolved	The dissolved oxygen content of surface waters shall not be depressed below 5 mg/L for waters designated WARM, or 6 mg/L for waters designated COLD, as a result of controllable water quality factors. In addition, waste discharges shall not cause the median dissolved oxygen concentration to fall below 85% of saturation or the 95th percentile concentration, or fall below 75% of saturation within a 30-day period.
Pathogen Indicator Bacteria	Waste discharges shall not cause or contribute to excessive risk of illness from microorganisms pathogenic to human beings. Pathogen indicator concentrations shall not exceed the values listed in Basin Plan Table 4-1 as a result of controllable water quality factors unless it is demonstrated to the RWQCB's satisfaction that the elevated indicator concentrations do not result in excessive risk of illness among people recreating in or near the water. In all cases, the level of water quality necessary to protect existing uses must be maintained. Where existing water quality is better than necessary to protect the designated use, the existing high level of water quality must be maintained unless it is demonstrated that existing or potential beneficial uses would be protected and that water quality consistent with maximum benefit to the people of California would be maintained, as specified in the State antidegradation policy (SWRCB Resolution No. 68-16). The RWQCB may also require recycled water discharged to fresh waters designated REC-1 or REC-2 to comply with other limitations recommended by the California Department of Public Health.
pH	The pH of inland surface waters shall not be raised above 8.5 pH or depressed below 6.5 pH as a result of controllable water quality factors.
Radioactivity	Radioactive materials shall not be present in the waters of the region in concentrations that are deleterious to human, plant, or animal life. Waters designated MUN shall meet the limits specified in the California Code of Regulations, Title 22, and listed here: ● Combined Radium-226 and Radium-228: 5 pCi/L ● Gross Alpha Particle Activity: 15 pCi/L ● Tritium: 20,000 pCi/L ● Strontium-90: 8 pCi/L ● Gross Beta Particle: 50 pCi/L ● Uranium 20: pCi/L
Sodium	The sodium objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.
Solids, Suspended and Settleable	Inland surface waters shall not contain suspended or settleable solids in amounts that cause a nuisance or adversely affect beneficial uses as a result of controllable water quality factors.

Table 3.10.B: Surface Water Quality Objectives for Inland Surface Waters

Constituent	Basin Plan Objective
Sulfate	The objectives listed in Basin Plan Table 4-1 shall not be exceeded as a result of controllable water quality factors.
Sulfides	The dissolved sulfide content of inland surface waters shall not be increased as a result of controllable water quality factors.
Surfactants (surface-active agents)	Waste discharges shall not contain concentrations of surfactants that result in foam in the course of flow or use of the receiving water, or that adversely affect aquatic life.
Taste and Odor	The inland surface waters of the region shall not contain, as a result of controllable water quality factors, taste- or odor-producing substances at concentrations that cause a nuisance or adversely affect beneficial uses. The natural taste and odor of fish, shellfish, or other regional inland surface water resources used for human consumption shall not be impaired.
Temperature	The natural receiving water temperature of inland surface waters shall not be altered unless it can be demonstrated to the satisfaction of the Regional Board that such alteration in temperature does not adversely affect beneficial uses. The temperature of waters designated COLD shall not be increased by more than 5°F as a result of controllable water quality factors. The temperature of waters designated WARM shall not be raised above 90°F from June through October or above 78°F during the rest of the year as a result of controllable water quality factors. Lake temperatures shall not be raised more than 4°F above established normal values as a result of controllable water quality factors.
Total Dissolved Solids	See Dissolved Solids, Total
Total Filtrable Residue	See Dissolved Solids, Total
Total Inorganic Nitrogen	See Nitrogen, Total Inorganic
Toxic Substances	Toxic substances shall not be discharged at levels that will bioaccumulate in aquatic resources to levels that are harmful to human health. The concentrations of contaminants in waters that are existing or potential sources of drinking water shall not occur at levels that are harmful to human health. The concentrations of toxic pollutants in the water column, sediments, or biota shall not adversely affect beneficial uses.
Turbidity	Increases in turbidity that result from controllable water quality factors shall comply with the following:

Natural Turbidity	Maximum Increase
0-5 NTU	20%
50-100 NTU	10 NTU
>100 NTU	10%

Source: Santa Ana Regional Water Quality Control Board, *Santa Ana River Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin,* Chapter 4 (1995, amended 2019).

°C = degrees Celsius
°F = degrees Fahrenheit
$CaCO_3$ = calcium carbonate
COLD = cold freshwater habitat
MBAS = Methylene Blue-Activated Substances
MUN = municipal supply
NO_3 = nitrate
NTU = nephelometric turbidity unit
pCi/L = picocuries per liter of air
REC-1 = contact water recreation
REC-2 = noncontact water recreation
RWQCB = Regional Water Quality Control Board
SWRCB = State Water Resources Control Board
UIA-N = un-ionized ammonia nitrogen
WARM = warm freshwater habitat

Table 3.10.C: Groundwater Quality Objectives

Constituent	Basin Plan Objectives
Arsenic	Arsenic concentrations shall not exceed 0.05 mg/L in groundwater designated MUN as a result of controllable water quality factors.
Bacteria, Coliform	Total coliform numbers shall not exceed 2.2 organisms/100 mL median over any 7-day period in groundwaters designated MUN as a result of controllable water quality factors.
Barium	Barium concentrations shall not exceed 1.0 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Boron	Boron concentrations shall not exceed 0.75 mg/L in groundwaters of the region as a result of controllable water quality factors.
Chloride	Chloride concentrations shall not exceed 500 mg/L in groundwaters of the region designated MUN as a result of controllable water quality factors.
Color	Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses.
Cyanide	Cyanide concentrations shall not exceed 0.2 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Dissolved Solids, Total (Total Filterable Residue)	The dissolved mineral content of the waters of the region, as measured by the total dissolved solids test ("Standard Methods for the Examination of Water and Wastewater, 20th Ed.," 1998: 2540C [180˚C], p.2-56), shall not exceed the specific objectives listed in Table 4-1 of the Santa Ana RWQCB Basin Plan as a result of controllable water quality factors. (See also discussion of management zone TDS and nitrate-nitrogen water quality objectives in the Santa Ana RWQCB Basin Plan.)
Filterable Residue, Total	See Dissolved Solids, Total.
Fluoride	Fluoride concentrations shall not exceed 1.0 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Hardness (as $CaCO_3$)	The hardness of receiving waters used for MUN shall not be increased as a result of waste discharges to levels that adversely affect beneficial uses.
Metals	Metal concentrations shall not exceed the values listed below in groundwaters designated MUN as a result of controllable water quality factors.
MBAS	MBAS concentrations shall not exceed 0.05 mg/L in groundwaters designated MUN as a result of controllable water quality factors.
Nitrogen (Nitrate, Nitrite)	Nitrate-nitrogen concentrations listed in Table 4-1 of the Santa Ana RWQCB Basin Plan shall not be exceeded as a result of controllable water quality factors. (See also discussion of management zone TDS and nitrate-nitrogen water quality objectives in the Santa Ana RWQCB Basin Plan.)
Oil and Grease	Waste discharges shall not result in deposition of oil, grease, wax, or other materials in concentrations that cause a nuisance or adversely affect beneficial uses.
pH	The pH of groundwater shall not be raised above 9 or depressed below 6 as a result of controllable water quality factors.

Metal (°C)	Concentration (mg/L)
Cadmium	0.01
Chromium	0.05
Cobalt	0.2
Copper	1.0
Iron	0.3
Lead	0.05
Manganese	0.05
Mercury	0.002
Selenium	0.01
Silver	0.05

Table 3.10.C: Groundwater Quality Objectives

Constituent	Basin Plan Objectives
Radioactivity	Radioactive materials shall not be present in the waters of the region in concentrations that are deleterious to human, plant, or animal life. Groundwaters designated MUN shall meet the limits specified in the California Code of Regulations, Title 22, and listed below: ● Combined Radium-226 and Radium-228 ..... 5 pCi/L ● Gross Alpha Particle Activity ..... 15 pCi/L ● Tritium ..... 20,000 pCi/L ● Strontium-90 ..... 8 pCi/L ● Gross Beta Particle Activity ..... 50 pCi/L ● Uranium ..... 20 pCi/L
Sodium	Groundwaters designated AGR shall not exceed a SAR of 9 as a result of controllable water quality factors.
Sulfate	Sulfate concentrations shall not exceed 500 mg/L in groundwaters of the region designated MUN as a result of controllable water quality factors.
Taste and Odor	The groundwaters of the region shall not contain, as a result of controllable water quality factors, taste- or odor-producing substances at concentrations that cause a nuisance or adversely affect beneficial uses.
Total Dissolved Solids	See Dissolved Solids, Total
Total Filtrable Residue	See Dissolved Solids, Total
Total Inorganic Nitrogen	See Nitrogen, Total Inorganic
Toxic Substances	All waters of the region shall be maintained free of substances in concentrations that are toxic or that produce detrimental physiological responses in human, plant, animal, or aquatic life.

Source: Santa Ana Regional Water Quality Control Board, *Santa Ana River Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin*, Chapter 4 (1995, amended 2019).

°C = degrees Celsius
AGR = agricultural water supply
MBAS = Methylene Blue-Activated Substances
mg/L= milligrams per liter
mL= milliliters
MUN= Municipal Water Supply
pCi/L= picocuries per liter of air
RWQCB = Regional Water Quality Control Board
SAR = sodium absorption ratio
TDS = total dissolved solids

Municipal Phase I Program MS4. The City of Lake Elsinore is a Co-Permittee of the *National Pollutant Discharge Elimination System (NPDES)* Permit *and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024* (Riverside County MS4 Permit).[24] The Riverside County MS4 Permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. The Riverside County MS4 Permit requires co-permittees to develop and implement standard design and post-development

[24] Santa Ana Regional Water Quality Control Board. 2010. *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024.* January 29. Effective January 29, 2010.

BMP guidance to guide application of Low Impact Development (LID) BMPs to the maximum extent practicable.

General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (*De Minimis*) Threat to Water Quality. The Santa Ana RWQCB's *General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (De Minimis) Threat to Water Quality, Order No. R8-2020-0006, NPDES No. CAG998001* (Groundwater Discharge Permit)[25] regulates wastewater discharges associated with construction dewatering. If dewatering occurs during construction of the Project within the Santa Ana RWQCB Region, it must comply with this permit.

Industrial General Permit. The Santa Ana RWQCB's *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. WQ 2014-0057-DWQ, as amended by Order No. WQ 2015-0122-DWQ and Order No. WQ 2018-0028-DWQ, NPDES No. CAS000001* (Industrial General Permit)[26] implements federally required stormwater regulations in California for stormwater associated with industrial activities discharging into waters of the United States.

3.10.4.4 Local Regulations

City of Lake Elsinore Municipal Code. Building and construction in the city are subject to the regulations of the City of Lake Elsinore Municipal Code. The following provisions of the City of Lake Elsinore Municipal Code address hydrology and water quality:

- **Chapter 14.08 (Stormwater/Urban Runoff Management and Discharge Controls):** Chapter 14.08 of the City of Lake Elsinore Municipal Code is intended to protect and enhance the water quality of City watercourses, water bodies, groundwater, and wetlands in a manner pursuant to and consistent with the Porter-Cologne Act and the CWA. The purpose of this chapter is to ensure the future health, safety, and general welfare of City citizens by reducing pollutants in stormwater discharges to the maximum extent practicable; regulating illegal connections and discharges to the storm drain system; and regulating nonstormwater discharges to the storm drain system.
    - **Section 14.08.100:** Requires projects obtain coverage under applicable NPDES permits, including NPDES Permits for Industrial/Commercial and Construction Activity.
- **Chapter 15.64 (Flood Damage Prevention):** Chapter 15.64 of the City of Lake Elsinore Municipal Code regulates development in flood hazard zones and provides the flood load and flood-resistant construction requirements of the building codes to promote the public health, safety, and general welfare and to minimize public and private losses due to flood conditions in specific flood hazard

[25] Santa Ana Regional Water Quality Control Board (RWQCB). 2020. General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (de minimis) Threat to Water Quality, Order No. R8-2020-0006, NPDES No. CAG998001. June 19. Effective July 1, 2020.

[26] State Water Resources Control Board (SWRCB). 2014. National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. WQ 2014-0057-DWQ, as amended by Order No. WQ 2015-0122-DWQ and Order No. WQ 2018-0028-DWQ, NPDES No. CAS000001. April 1. Effective July 1, 2015.

areas. The chapter also establishes comprehensive regulations for the management of flood hazard areas, designed to prevent unnecessary disruption of commerce, access, and public service during times of flooding; manage the alteration of natural floodplains, stream channels, and shorelines; manage filling, grading, dredging, and other development that may increase flood damage or erosion potential; prevent or regulate the construction of flood barriers that will divert floodwaters or that can increase flood hazards; and contribute to improved construction techniques in the floodplain.

City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. Chapter 4.0 of the City of Lake Elsinore General Plan addresses resource protection and preservation issues related to water resources.

- **Goal 4:** Improve water quality and ensure the water supply is not degraded as a result of urbanization of the City.
    - **Policy 4.1:** Encourage developers to provide clean water systems that reduce pollutants being discharged into the drainage system to the maximum extent feasible and meet required federal National Pollutant Discharge Elimination System (NPDES) standards.
    - **Policy 4.3:** Require Best Management Practices through project conditions of approval for development to meet the Federal NPDES permit requirements.

3.10.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Guidelines* Based on these thresholds, implementation of the proposed Project could have a significant adverse impact related to hydrology and water quality if it would:

Threshold 3.10.1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality,

Threshold 3.10.2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin,

Threshold 3.10.3: 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; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows,

Threshold 3.10.4: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation, or

Threshold 3.10.5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.10.6 Project Impacts

Threshold 3.10.1: **Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Less Than Significant. The proposed Project includes the construction of two warehouses totaling 1,000,451 square feet within the Onsite Development Area. Building 1 would be located at the northwestern end of the Onsite Development Area and would include 212,028 square feet of warehouse uses, approximately 5,000 square feet of office space on the ground floor, a 5,000-square-foot mezzanine, and 23 dock doors along the southwest side of the building. Building 2 would be located at the southeastern end of the Onsite Development Area and would include 768,423 square feet of warehouse uses, approximately 10,000 square feet of office space on the ground floor, a 10,000-square-foot mezzanine, and 110 dock doors along the northeast side of the building.

Construction. Pollutants of concern during construction include sediment, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be a temporary increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (e.g., paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. Sediment from increased soil erosion and chemicals from spills and leaks have the potential to be transported via stormwater runoff into receiving waters (i.e., Temescal Creek, Lake Elsinore, and the Santa Ana River Reach 3).

Because construction of the proposed Project would disturb greater than 1 acre of soil, the proposed Project would be subject to the requirements of the SWRCB's Construction General Permit. The proposed Project would also be required to comply with Chapter 14.08 of the City of Lake Elsinore Municipal Code, Stormwater/Urban Runoff Management and Discharge Controls, which requires projects obtain coverage under applicable NPDES permits. As specified in **Regulatory Compliance Measure (RCM) WQ-1,** and as required by the Construction General Permit and City of Lake Elsinore Municipal Code, the construction contractor would be required to prepare a SWPPP and implement construction BMPs detailed in the SWPPP during construction activities. Construction BMPs would include, but not be limited to, erosion and sediment control (designed to minimize erosion and retain sediment on site), and good housekeeping practices to prevent spills, leaks, and discharge of construction debris and waste into receiving waters.

According to the Geotechnical Evaluation prepared for the proposed Project, groundwater was encountered at the Project site at depths between 11 and 45 feet below existing grade. Based on

nearby groundwater wells, the elevation of the nearby creek bottom approximately 750 feet northeast of the Project site, and groundwater data gathered during the subsurface evaluation, historic high groundwater is estimated to be approximately 10 feet below the existing grade. In addition, seasonal fluctuations of groundwater elevations are expected over time. In general, groundwater levels fluctuate with the seasons, and local zones of perched groundwater may be present within the near-surface deposits due to local seepage or during rainy seasons.

Excavation depths for rough grading, compaction for building foundations, and utility trenching would reach between 0 feet and 100 feet below ground surface (bgs) across the Project site. As such, excavation during construction of the proposed Project is expected to extend to a depth that may encounter groundwater, and groundwater dewatering may be required during Project construction. Groundwater dewatering activities could affect surface water quality through the discharge of polluted groundwater, if present, to surface water bodies, such as the receiving waters for the Project site (i.e., Temescal Creek, Lake Elsinore, and the Santa Ana River). Although groundwater is not anticipated to be polluted, **RCM WQ-2** would require groundwater dewatering activities to comply with the Santa Ana RWQCB's Groundwater Discharge Permit. In compliance with the requirements of the Groundwater Discharge Permit, groundwater would be tested and treated (if necessary) prior to discharge to surface water.

With implementation of **RCMs WQ-1** and **WQ-2**, including preparation of a SWPPP, implementation of construction BMPs, and testing and treatment of groundwater prior to discharge to surface water, impacts associated with applicable water quality standards or waste discharge requirements during Project construction would be **less than significant**, and no mitigation is required.

Operation. During operation, anticipated pollutants of concern associated with the proposed Project include bacterial indicators, metals, nutrients, pesticides, toxic organic compounds, sediments, trash and debris, and oils and grease. Potential sources of these pollutants associated with the proposed Project include the following:

- **Bacterial Indicators:** Food wastes, sediment, pavement runoff, and landscaping areas
- **Metals and Toxic Organic Compounds:** Automobiles and surface parking areas
- **Nutrients:** Fertilizers, sediment, and trash/debris
- **Pesticides:** Landscaping activities
- **Sediment:** Disturbed or unstabilized landscaping areas and disturbed earth surfaces
- **Trash and Debris:** Landscaping activities, food wrappers, and food wastes
- **Oil and Grease:** Internal streets and parked vehicles

As previously discussed, Temescal Creek is listed on the most recent USEPA approved 303(d) list (2024) as impaired for copper, iron, malathion, and oil/grease; Lake Elsinore is listed as impaired for DDT, PCBs, toxicity, microcystins, ammonia, nutrients, organic enrichment/low dissolved oxygen, and low dissolved oxygen; and the Santa Ana River (Reach 3) is listed as impaired for

copper, lead, indictor bacteria, bifenthrin, pyrethroids, and toxicity.[27] The Santa Ana RWQCB has adopted TMDL implementation plans for indicator bacteria for the Santa Ana River (Reach 3), and ammonia, nutrients, and organic enrichment/low dissolved oxygen for Lake Elsinore, which are applicable to the proposed Project. Other TMDL implementation plans for DDT, PCBs, toxicity, and microcystins for Lake Elsinore; copper, lead, bifenthrin, and pyrethroids for the Santa Ana River; and copper, iron, malathion, and oil/grease for Temescal Creek are anticipated to be completed by 2037. [28]

As previously discussed, the City is a Co-Permittee of the Riverside County MS4 Permit. The Riverside County MS4 Permit requires the preparation of project-specific WQMPs for new development and significant redevelopment projects. A preliminary WQMP has been prepared for the proposed Project, in compliance with the Riverside County MS4 Permit, that details permanent structural source control and operational source control BMPs that would be implemented to reduce impacts to water quality from operation of the Project, as detailed in Table 3.10.D: Permanent and Operational Source Control Measures, below.

Table 3.10.D: Permanent and Operational Source Control Measures

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
On-Site Storm Drain Inlets	Mark all inlets with the words, "Only Rain Down the Storm Drain" or similar. Catch basin markers shall be per local agency requirements.	Maintain and periodically repaint or replace inlet markings. Provide stormwater pollution prevention information to new site owners, lessees, or operators. Implement applicable operational BMPs in Fact Sheet SC-44, "Drainage System Maintenance," in the CASQA Stormwater Quality Handbooks. Include the following in lease agreements: "Tenant shall not allow anyone to discharge anything to storm drains or to store or deposit materials so as to create a potential discharge to storm drains."
Landscape/Outdoor Pesticide Use	Final landscape plans will accomplish all of the following: a. Preserve existing native trees, shrubs, and ground cover to the maximum extent possible. b. Design landscaping to minimize irrigation and runoff, promote surface infiltration where appropriate, and minimize the use of fertilizers and pesticides that can contribute to stormwater pollution. c. Where landscaped areas are used to retain or detain stormwater, specify plants that are tolerant of saturated soil conditions.	Sweep plazas, sidewalks, and parking lots regularly to prevent the accumulation of litter and debris. Collect debris from pressure washing to prevent entry into the storm drain system. Collect wash water containing a cleaning agent or degreaser and discharge to the sanitary sewer rather than a storm drain.

[27] State Water Resources Control Board. *California 2024 Integrated Report* (303(d) List/305(b) Report). Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html).

[28] Ibid.

Table 3.10.D: Permanent and Operational Source Control Measures

Potential Sources of Runoff Pollutants	Permanent Structural Source Control BMPs	Operational Source Control BMPs
	d. Consider using pest-resistant plants, especially adjacent to hardscape. e. To ensure successful establishment, select plants appropriate to site soils, slopes, climate, sun, wind, rain, land use, air movement, ecological consistency, and plant interactions.	
Loading Docks	–	Move loaded and unloaded items indoors as soon as possible. Implement applicable operational BMPs in Fact Sheet SC-30, "Outdoor Loading and Unloading," in the CASQA Stormwater Quality Handbooks.
Fire Sprinkler Test Water	Provide a means to drain fire sprinkler test water to the sanitary sewer.	Implement applicable operational BMPs in Fact Sheet SC-41, "Building and Grounds Maintenance," in the CASQA Stormwater Quality Handbooks.
Miscellaneous Drain or Wash Water of Other Sources (roofing, gutters, and trim)	Avoid roofing, gutters, and trim made of copper or other unprotected metals that may leach into runoff.	
Plazas, Sidewalks, and Parking Lots	–	Sweep plazas, sidewalks, and parking lots regularly to prevent the accumulation of litter and debris.
Refuse Areas	Site refuse will be handled through dumpsters located around the Project that will be covered, graded, and paved to prevent run on. Signs will be posted on or near dumpsters with the words, "do not dump hazardous materials here" or similar.	Provide an adequate number of receptacles. Inspect receptacles regularly; repair or replace leaky receptacles. Keep receptacles covered. Prohibit/prevent the dumping of liquid or hazardous wastes. Post "no hazardous materials" signs. Inspect and pick up litter daily and clean up spills immediately. Keep spill control materials available on-site. Implement applicable operational BMPs in Fact Sheet SC-34, "Waste Handling and Disposal," in the CASQA Stormwater Quality Handbooks.
Industrial Processes	All process activities to be performed indoors. No processes to drain to exterior or to storm drain system.	Implement applicable operational BMPs in Fact Sheet SC-10, "NonStormwater Discharges" in the CASQA Stormwater Quality Handbooks.

Source: KWC Engineers, *Project-Specific Water Quality Management Plan, Baker Industrial* (August 14, 2023; revised March 11, 2025).
CASQA = California Stormwater Quality Association

The proposed Project also includes an on-site storm drain system and LID BMPs, including three corrugated metal pipe (CMP) detention systems and 11 modular wetlands system (MWS) units, to capture and treat stormwater runoff before discharging it to Temescal Creek north of the

Project site. Stormwater from the Onsite Development Area and Offsite Improvements Area would be collected via catch basins throughout the Onsite Development Area and along the Offsite Improvements Area and directed to the CMP detention systems, which would be designed to detain the design volume of stormwater before discharging it to the MWS Units. The MWS units would treat stormwater before discharging it to the Restoration Area, vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. The locations of each CMP detention system and MWS unit are shown on Figure 3.10-2: Proposed Drainage Management Areas and described in detail under Threshold 3.10.3, below. In general, each CMP detention system would include its own MWS unit, and an additional eight MWS units would be located along Baker Street.

As specified in RCM WQ-3, and as required by the Riverside County MS4 Permit, the proposed Project would prepare a Final WQMP. The Final WQMP would specify the site design, source control, LID, and treatment control BMPs that would be implemented to capture, treat, and reduce pollutants of concern in stormwater runoff. Site design BMPs are stormwater management strategies that emphasize conservation and use of existing site features to reduce the amount of runoff and pollutant loading generated from a site. Source control BMPs are preventative measures that are implemented to prevent the introduction of pollutants into stormwater. LID BMPs mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains. Treatment control BMPs are structural BMPs designed to treat and reduce pollutants in stormwater runoff prior to releasing it to receiving waters.

Project operation would not require groundwater dewatering. Therefore, there is not a direct path for pollutants to reach groundwater. Thus, it is not discussed in further detail here.

In addition, the proposed Project would be subject to the requirements of the Industrial General Permit, as detailed in RCM WQ-4. The Industrial General Permit authorizes discharges of industrial storm water to receiving waters, so long as those discharges comply with all requirements, provisions, limitations, and prohibitions detailed in the Industrial General Permit. As required by the Industrial General Permit, the proposed LID BMPs would have sufficient capacity to capture and treat authorized nonstormwater sources and stormwater associated with industrial activities produced up to and during the 85th percentile 24-hour precipitation event based on local, historical precipitation data and records in order to support the attainment of water quality standards. The capacity of the proposed LID BMPs would be detailed in the Final WQMP prepared for the proposed Project.

With implementation of RCMs WQ-3 and WQ-4, which require adherence to the Riverside County MS4 Permit and the Industrial General Permit requirements, including preparation of a Final WQMP and implementation of BMPs to address pollutants of concern in stormwater runoff, Project impacts associated with the violation of water quality standards or waste discharge requirements or the degradation of surface or groundwater water quality during Project operation would be **less than significant**, and no mitigation is required.

With adherence to RCMs WQ-1, WQ-2, and WQ-3, the proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Impacts would be **less than significant**, and no mitigation is required.

Threshold 3.10.2: Would the project 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. As previously discussed, the Project site lies within the boundaries of the Elsinore Valley Groundwater Subbasin, and groundwater was encountered at the Project site at depths between 11 and 45 feet below existing grade. Based on nearby groundwater wells, the elevation of the nearby creek bottom approximately 750 feet northeast of the Project site, and groundwater data gathered during the subsurface evaluation, historic high groundwater is estimated to be approximately 10 feet below existing grade.

Construction. As discussed above, excavation depths for rough grading, compaction for building foundations, and utility trenching would reach between 0 feet and 100 feet bgs across the Project site. As such, excavation during construction of the proposed Project is expected to extend to a depth that may encounter groundwater, and groundwater dewatering may be required during Project construction. However, compared to the estimated 1,400,000 acre-feet of groundwater in storage in the Elsinore Groundwater Basin, the amount of water that would be extracted would not be substantial and would only occur temporarily during construction.

In addition, existing drainage patterns at the Project site would generally be maintained during construction, and natural infiltration would continue to occur within Temescal Creek. Therefore, construction of the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Impacts would be **less than significant**, and no mitigation is required.

Operation. The 65.81-acre Onsite Development Area is considered entirely pervious. Development of the Onsite Development Area, on which the two warehouse buildings and associated parking areas are proposed, would convert 50.31 acres of pervious surface area to impervious surface area,[29] which would decrease the potential for on-site infiltration. The proposed Project includes landscaped areas that will provide pervious areas where stormwater runoff can collect and continue to infiltrate and would include modular wetlands and CMP detention systems that would treat stormwater before discharging to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street. Therefore, recharge of stormwater on the Project site would continue to occur.

Project operation would not require groundwater dewatering; however, operation of the proposed Project would increase water demand within the Onsite Development Area, which

[29] KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial.* Pages 15 and 16. August 14. Revised March 11, 2025.

would be supplied by the EVMWD. According to EVMWD's UWMP,[30] potable water supply includes local groundwater, surface water from the Canyon Lake Reservoir, imported water from the Metropolitan Water District of Southern California (MWD), and recycled water. As provided by the UWMP, EVMWD's projected water supply from these sources was estimated to be 47,218 AFY for 2025, 53,261 AFY for 2035, and 55,328 AFY for 2045, as provided in Table 3.10.E, below.

Table 3.10.E: EVMWD Projected Water Supplies, AFY (2025–2045)

Water Supply	Additional Detail on Water Supply	Projected Water Supply (AFY)		
		2025	2035	2045
Purchased or Imported Water	MWD[1]	26,286	26,286	26,286
Purchased or Imported Water	Raw Imported Water, MWD[1,2]	0	3,700	3,700
Groundwater	Elsinore Valley Subbasin[3]	5,500	5,500	5,500
Groundwater	Coldwater Subbasin[3]	1,200	1,200	1,200
Groundwater	Bedford Subbasin[3]	1,300	1,300	1,300
Groundwater	Lee Lake Subbasin[3]	875	875	875
Groundwater	Palomar Well Replacement[3]	450	450	450
Groundwater	Temecula-Pauba[3]	0	750	750
Surface Water	Canyon Lake Reservoir	2,500	2,500	2,500
Recycled Water	Temescal Wash and Lake Elsinore Replenishment	7,270	8,863	8,960
Recycled Water	Metered Customers	1,459	1,459	1,459
Recycled Water	Canyon Lake and Summerly Golf Course	378	378	378
Recycled Water	Santa Rosa Water Reclamation Facility[4]	0	0	1,970
	Total	***47,218***	***53,261***	***55,328***

Source: Elsinore Valley Municipal Water District, *Final 2020 Urban Water Management Plan,* Table ES-4, Projected Water Supplies, AFY (June 2021).

[1] Imported water will be used to fill the gaps based on the availability of local supplies. There is no total right or safe yield. EVMWD can purchase more water at an additional charge.

[2] Starting in 2026, EVMWD plans to start purchasing about 3,700 AFY of raw imported water from MWD for treatment at the Canyon Lake Water Treatment Plant.

[3] The safe yield for the groundwater subbasins will be established with their respective Groundwater Sustainability Plans.

[4] In accordance with its NPDES permit, EVMWD is permitted to discharging 0.5 mgd to Temescal Wash and 7.5 mgd to Lake Elsinore. EVMWD is planning to use excess wastewater collected at the Regional Water Reclamation Facility to implement an indirect potable reuse project. It is anticipated that this water will be available between 2035 and 2040.

AFY = acre-feet per year
EVMWD = Elsinore Valley Municipal Water District
mgd = million gallons per day
MWD = Metropolitan Water District of Southern California
NPDES = National Pollutant Discharge Elimination System

As such, the proposed Project would at least indirectly use groundwater during operation. However, water supply and demand analysis prepared as part of the UWMP indicates that the EVMWD would have sufficient supplies available during normal, single dry, and 5-year consecutive droughts. The UWMP incorporates anticipated future populations and land uses from the City, as provided by the City's General Plan, into water demand estimates. Because the proposed Project is consistent with the Limited Industrial land use designation, development of the proposed

[30] Elsinore Valley Municipal Water District. 2021. *Final 2020 Urban Water Management Plan.* June.

Project has been included in the EVMWD's water supply and demand analysis, and sufficient supplies exist to serve the proposed Project.

In addition, a WSA[31] was prepared for the proposed Project. The WSA indicated that the EVMWD included the proposed Project as a planned development (Reference No. 364) in the UWMP, and that the anticipated water demand for the proposed Project is 52 AFY. In addition, according to the WSA, the EVMWD has a surplus of water to meet its projected demands, which include the anticipated demands of 52 AFY for the proposed Project. Therefore, EVMWD's supplies are adequate to provide the proposed Project's demands. Further, EVMWD has a diverse supply portfolio that provides operational flexibility and reliability. In 2020, EVMWD relied on local groundwater to meet about 36 percent of the potable demands, promoted the use of recycled water to offset potable water needs, and imported water to meet any remaining demands.[32] EVMWD intends to continue promoting conservation, evaluating supplemental supplies, and participating in projects, when feasible, to ensure its water supply sources are protected and sustainable throughout the future. To mitigate and adapt to unpredictable conditions, EVMWD will also continue to diversify its local water supply portfolio.[33]

Therefore, operation of the proposed Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge. Impacts would be **less than significant**, and no mitigation is required.

Threshold 3.10.3: Would the Project 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; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?

Under existing conditions, stormwater on the Project site drains northeast and discharges into Temescal Creek, which is northeast of the Project site. Temescal Creek is a major tributary to the Santa Ana River, located approximately 20 miles northwest of the Project site. During periods of high lake levels, Lake Elsinore flows into Temescal Creek.

With implementation of the proposed Project, two new public 48-inch storm drain lines would collect stormwater from properties southwest of the Onsite Development Area and convey runoff through the Onsite Development Area to discharge into the Restoration Area and vernal pool area northeast of Baker Street. Proposed on-site stormwater conveyance infrastructure would include private 24-inch storm drain lines that would collect stormwater from the developed area and convey runoff to the CMP detention systems and modular wetlands located throughout the Project site before

31 Carollo Engineers, Inc. 2025. *Baker Street Water Supply Assessment.* Pages ES-1 through ES-3. April.
32 Ibid.
33 Ibid.

discharging to the Restoration Area and vernal pool area via storm drain pipes northeast of Baker Street. Rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

The Project site would be divided into 11 drainage management areas (DMAs A through E2) to manage stormwater runoff from the entire Project site. These DMAs are designed to imitate the existing hydrologic pattern of the Project site in terms of pre- and post-Project storm flows, discharge depth/width, velocity, and watershed timing to ensure vernal pools that are located along the north ROW of Baker Street are protected.[34] Continuous, all-year low-flow water conveyance due to "urban slobber" would be detrimental to the vernal pool preservation; accordingly, each of the 11 DMAs detailed below are designed to direct stormwater into biotreatment LID BMPs (modular wetlands and CMP detention basins) to maintain water quality standards prior to discharge into the vernal pool areas adjacent to and within the Restoration Area, thus replicating existing runoff conditions.[35] Due to irrigation requirements of bioretention basins, biotreatment facilities represent the most suitable BMP for the Project's constraints, goals, and requirements.[36]

The 11 DMAs are discussed below, and depicted in Figure 3.10-2: Proposed Drainage Management Areas:

- **DMA A** would be approximately 10.39 acres and would manage stormwater runoff from the portion of the Project site that includes the proposed Building 1. This area would include approximately 58,531 square feet of landscaping and approximately 394,037 square feet of impervious surface area (e.g., roofs and concrete). Stormwater runoff from impervious areas within DMA A would flow to one of the two CMP detention systems located between Buildings 1 and 2 along Baker Street. The CMP detention system would be designed to detain the design volume of stormwater before discharging the stormwater to the MWS unit located adjacent to the CMP detention system. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA B** would be approximately 18.49 acres and would manage stormwater runoff from the portion of the Project site that includes the western half of the proposed Building 2. This area would include approximately 124,738 square feet of landscaping and approximately 680,670 square feet of impervious surface area (e.g., roofs and concrete). Stormwater runoff from impervious areas within DMA B would flow to the second of two proposed CMP detention systems located between Buildings 1 and 2 along Baker Street. The CMP detention system would be designed to detain the design volume of stormwater before discharging the stormwater to the MWS unit located adjacent to the CMP detention system. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal

[34] In addition to hydrological constraints of the vernal pools, seasonal low-flow drainage is also taken into consideration in regard to landscape irrigation and concerns regarding over-irrigation.

[35] KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial.* Page 18. August 14. Revised March 11, 2025.

[36] Ibid.

Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA C** would be approximately 22.83 acres and would manage stormwater runoff from the portion of the Project site that includes the eastern half of the proposed Building 2 and the southernmost parking lot. This area would include approximately 107,278 square feet of landscaping and approximately 887,196 square feet of impervious surface area (e.g., roofs and concrete). Stormwater runoff from impervious areas within DMA C would flow to a CMP detention system located near the southern end of Building 2 along Baker Street. The CMP detention system would be designed to detain the design volume of stormwater before discharging the stormwater to the MWS unit located adjacent to the CMP detention system. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA D1** would be approximately 0.89 acre and would manage stormwater runoff from the portion of the Project site that includes the segment of Baker Street along the Project site's frontage, south of Pierce Street. This area would include approximately 38,793 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA D1 would flow to the MWS unit located adjacent to Baker Street. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA D2** would be approximately 2.13 acres and would manage stormwater runoff from the portion of the Project site's frontage south of Pierce Street, between DMA D1 and DMAs A and B. This area would include approximately 50,379 square feet of landscaping and approximately 42,443 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA D2 would flow to the MWS unit adjacent to Baker Street. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA D3** would be approximately 0.35 acre and would manage stormwater runoff from the portion of the Project site that includes the segment of Baker Street along the Project site's frontage, south of DMA D1. This area would include approximately 15,136 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA D3 would flow to the MWS unit located adjacent to Baker Street. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-

rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA D4** would be approximately 0.64 acre and would manage stormwater runoff from the portion of the Project site's frontage south of DMA D2 and between DMA D3 and DMA B. This area would include approximately 12,534 square feet of landscaping and approximately 15,131 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA D4 would flow to the MWS unit located adjacent to Baker Street. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA D5** would be approximately 0.69 acre and would manage stormwater runoff from the portion of the Project site that includes the segment of Baker Street along the Project site's entire frontage, south of DMA D3. This area would include approximately 30,122 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA D5 would flow to the MWS unit located adjacent to Baker Street. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA D6** would be approximately 1.27 acres and would manage stormwater runoff from the portion of the Project site's frontage south of DMA D4 and between DMA D5 and DMA C. This area would include approximately 23,146 square feet of landscaping and approximately 32,014 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA D6 would flow to the MWS unit located adjacent to Baker Street. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA E1** would be approximately 1.69 acres and would manage stormwater runoff from the portion of the Project site that includes the segment of Pierce Street along the Project site's entire frontage. This area would include approximately 28,861 square feet of landscaping and approximately 44,771 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA E1 would flow to the MWS unit within DMA E1. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

- **DMA E2** would be approximately 0.25 acre and would manage stormwater runoff from the portion of the Project site that includes the segment of Baker Street between Pierce Street and

Nichols Road. This area would include approximately 11,044 square feet of impervious surface area (e.g., concrete). Stormwater runoff from impervious areas within DMA E2 would flow to the MWS unit located within DMA E2. Stormwater would be treated by the MWS unit before being discharged to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. As discussed above, rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

Threshold 3.10.3(i): Result in substantial erosion or siltation on or off site?

Less Than Significant. During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be a temporary increase in the potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above under Threshold 3.10.1, and as specified in RCM WQ-1, the construction contractor would be required to obtain coverage under the Construction General Permit, which requires preparation of a SWPPP. The SWPPP would detail erosion control and sediment control BMPs to be implemented during construction to minimize erosion and retain sediment on site.

The Construction General Permit requires preparation and implementation of a SWPPP by a Qualified SWPPP Developer for construction activities that disturb 1 acre or more of soils. The SWPPP is required to address site-specific conditions related to potential sources of sedimentation and erosion and would list the required BMPs that are necessary to reduce or eliminate the potential of erosion or alternation of a drainage pattern during construction activities. Common types of construction BMPs include:

- Silt fencing, fiber rolls, or gravel bags;
- Street sweeping and vacuuming;
- Storm drain inlet protection;
- Stabilized construction entrance/exit;
- Vehicle and equipment maintenance, cleaning, and fueling;
- Hydroseeding;
- Materials delivery and storage;
- Stockpile management;
- Spill prevention and control;
- Solid waste management; and/or
- Concrete waste management.

In addition, a Qualified SWPPP Practitioner is required to ensure compliance with the SWPPP through regular monitoring and visual inspection during construction activities. The SWPPP would be amended and BMPs revised, as determined necessary through field inspections, to protect against substantial soil erosion, the loss of topsoil, or alteration of the drainage pattern. Compliance with the Construction General Permit and a SWPPP prepared by a Qualified SWPPP Developer and implemented by a Qualified SWPPP Practitioner would prevent construction-related impacts related to potential alteration of a drainage pattern or erosion from development activities. With implementation of the existing construction regulations (RCM WQ-1) that would be verified by the

City during the permitting approval process, impacts related to alteration of an existing drainage pattern during construction that could result in substantial erosion or siltation would be **less than significant**, and no mitigation is required.

Development of the 65.81-acre Onsite Development Area, on which the two warehouse buildings and associated parking areas are proposed, would convert 50.31 acres of pervious surface area to impervious surface area.[37]The proposed Project would also develop the Off-Site Improvements Area with new roadways, which would increase the impervious surface area. An increase in impervious surface area increases the rate and volume of runoff during a storm, which can more effectively transport sediments to receiving waters. However, the impervious surface areas on the Project site, including within the Off-Site Improvements Area, would not be prone to on-site erosion or siltation because there would be no exposed soil. The remaining 15.50 acres of pervious surfaces on the Project site would be landscaped with vegetation that would stabilize the soil and promote infiltration, thereby minimizing on-site erosion and siltation. Additionally, the proposed Project would include rip-rap wingwalls at the discharge points to prevent soil erosion from stormwater flows.

In addition, stormwater runoff from the addition of impervious surfaces from development of the Project would be conveyed to biotreatment LID BMPs (modular wetlands and CMP detention basins) that have been designed to maintain water quality and meet the NPDES Permit requirements. As part of the Project permitting approval process, the Project would be required to adhere to RCM WQ-3, which requires the preparation of a Final WQMP in compliance with the Riverside County MS4 Permit and the implementation of Site Design, Source Control, and LID BMPs that minimize stormwater runoff, thereby minimizing on-site erosion and siltation. With adherence to RCM Measure WQ-3, operational impacts related to on-site or off-site erosion or siltation would be **less than significant**, and no mitigation is required.

Threshold 3.10.3(ii): Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site? and,

Threshold 3.10.3(iv): Impede or redirect flood flows?

Less Than Significant. According to FEMA FIRM No. 06065C2028G (effective August 28, 2008), approximately 78 percent of the Project site is mapped as within Zone X (area of minimal flood hazard and area with 0.2 percent annual chance of flood hazard),[38] approximately 16 percent is within Zone

[37] KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial.* Pages 15 and 16. August 14. Revised March 11, 2025.

[38] Under Title 44 of the Code of Federal Regulations (CFR), Section 64.3, Zone X corresponds to areas outside the 1 percent annual chance floodplain, meaning they are considered to be at moderate or minimal risk of flooding.

A (1 percent annual chance of flood hazard),[39] and approximately 6 percent is within Zone AE (regulatory floodway).[40,41] Figure 3.10-1 depicts the flood hazard zones at the Project site.

Project construction would comply with the requirements of the Construction General Permit and would include the preparation and implementation of a SWPPP pursuant to RCM WQ-1. The SWPPP would include construction BMPs (e.g., soil binders, straw mulch, nonvegetative stabilization, fiber rolls, sandbag barriers, straw bale barriers, a stabilized construction entrance/exit, a stabilized construction roadway, and an entrance/outlet tire wash) to control the rate and amount of on-site surface runoff and direct flows to ensure that stormwater runoff from the construction site does not result in on- or off-site flooding. With adherence to RCM WQ-1, construction impacts related to a substantial increase in the rate or amount of surface runoff that would result in flooding and impede or redirect flood waters would be less than significant, and mitigation is not required.

As previously discussed, development of the 65.81-acre Onsite Development Area would convert 50.31 acres of pervious surface area to impervious surface area,[42] which would increase the rate and volume of stormwater runoff.

A hydrologic condition of concern (HCOC) occurs when post-development runoff conditions exceed pre-development runoff conditions, and discharge from the project site has a flow rate greater than 110 percent of the pre-development 2-year peak flow. Generally, projects are exempt from HCOC analysis if: (1) they disturb less than 1 acre; (2) the volume and time of concentration of stormwater runoff under post-development conditions are within 5 percent of pre-development conditions for a 2-year return frequency 24-hour storm; or (3) all downstream conveyance channels discharge to an adequate sump[43] (e.g., the Santa Ana River or Prado Dam). An "adequate sump" is defined as a sump that is engineered and regularly maintained to ensure design flow capacity; no sensitive stream habitat areas would be adversely affected, or they are not identified on the Co-Permittees Hydromodification Sensitivity Maps.

Due to irrigation requirements of bioretention basins, biotreatment facilities represent the most suitable BMP for the Project constraints, goals, and requirements.[44] In cases where excess volume cannot be infiltrated or captured and reused, discharge from the site must be limited to a flow rate no greater than 110 percent of the pre-development 2-year peak flow in order for the Project not to

39 Under CFR Title 44, Section 64.3, Zone A corresponds to areas subject to inundation by the 1 percent annual chance flood (also known as the 100-year flood) where no Base Flood Elevations (BFEs) or floodways are provided.

40 Under CFR Title 44, Section 64.3, Zone AE corresponds to areas within the 1 percent annual chance floodplain (also known as the 100-year floodplain) where detailed analyses have been conducted to determine BFEs. These elevations represent the expected water surface height during a base flood event.

41 Federal Emergency Management Agency. 2008. Flood Insurance Rate Map (FIRM) No. 06065C2028G. August 28.

42 KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial.* Pages 15 and 16. August 14. Revised March 11, 2025.

43 A "sump" generally refers to a low-lying area designed to collect and store water, usually runoff, groundwater, or drainage from a system.

44 KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial.* Page 18. August 14. Revised March 11, 2025.

result in an HCOC.[45] Accordingly, proposed DMAs A through E2 are designed to direct stormwater into biotreatment LID BMPs (modular wetlands and CMP detention basins) to imitate the existing hydrologic pattern of the Project site in terms of pre- and post-Project storm flow, discharge depth/width, velocity, and watershed timing to ensure the post-development hydrograph is no more than 10 percent greater than the pre-development hydrograph, thus replicating existing runoff conditions.[46] The proposed LID BMPs are designed to be consistent with the requirements of the Riverside County MS4 Permit (RCM WQ-3) and would capture, detain, and discharge stormwater runoff consistent with the requirements of the Riverside County MS4 Permit to avoid an HCOC.

Compliance with the Riverside County MS4 Permit would ensure that operational activities would not result in a substantial increase in the rate or amount of surface runoff or impede or redirect flood flows in a manner that would result in on- or off-site flooding. Impacts would be **less than significant**, and mitigation is not required.

Threshold 3.10.3(iii): Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant. Construction of the proposed Project has the potential to introduce pollutants to existing stormwater runoff. However, as specified in RCM WQ-1, the Construction General Permit requires preparation of a SWPPP and implementation of construction BMPs that target pollutants of concern in runoff from the Project site and prevent substantial additional sources of polluted runoff being discharged into receiving waters. The SWPPP would include construction BMPs to control and direct surface runoff on the Project site and would include detention measures to ensure that stormwater runoff from the construction activities does not exceed the capacity of the stormwater drainage systems. With implementation of RCM WQ-1, construction impacts related to the creation or contribution of stormwater runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff would be **less than significant**, and no mitigation is required.

With implementation of the proposed Project, stormwater would be conveyed to the CMP detention systems and MWSs before discharging to the Restoration Area and vernal pool area northeast of Baker Street. The proposed Project would also include the installation of two public 48-inch storm drain lines to convey off-site stormwater runoff from properties southwest of the Project site across the Project site before discharging to the Restoration Area and vernal pool area northeast of Baker Street. Rip-rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows. The on-site stormwater facilities, CMP detention systems, and modular wetlands would be appropriately sized to detain the design capture volume (DCV) so that stormwater runoff does not exceed the capacity of the existing stormwater drainage system. In addition, the modular wetlands would treat stormwater before discharging to the Restoration Area, the vernal pool area, and Temescal Creek northeast of Baker Street, similar to existing conditions. Additionally, the proposed Project would include rip-rap wingwalls at the discharge points to prevent soil erosion from stormwater flows and would adhere to RCM WQ-3, which requires implementation of operational

[45] Ibid. Page 28.
[46] Ibid.

BMPs that target and reduce pollutants of concern in stormwater runoff. Therefore, operational impacts related to creation or contribution of stormwater runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff would be **less than significant,** and mitigation is not required.

Threshold 3.10.4: Would the Project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less Than Significant

Flooding. As discussed under Threshold 3.10.3(ii), above, approximately 78 percent of the Project site is mapped as within Zone X (area of minimal flood hazard and area with 0.2 percent annual chance of flood hazard), approximately 16 percent is within Zone A (1 percent annual chance of flood hazard), and approximately 6 percent is within Zone AE (regulatory floodway).[47] Figure 3.10-1 depicts the flood hazard zones at the Project site. As shown on Figure 3.10-1, the Onsite Development Area, which would consist of the proposed warehouses, is located entirely within Zone X and therefore would not be subject to significant flooding hazards. The portion of the Project site designated as Zone A and Zone AE would consist of the Restoration Area and would not include any habitable structures.

During construction, BMPs would be implemented to ensure that during a rain event, pollutants would be retained on site and would be prevented from reaching downstream receiving waters in accordance with RCM WQ-1. In addition, if groundwater dewatering is required during construction activities, additional BMPs would be required consistent with the Groundwater Discharge Permit to ensure that floodwaters would not impact the groundwater being pulled and disposed of. Compliance with the Groundwater Discharge Permit is detailed in RCM WQ-2. During operation, the proposed Project would generally maintain the existing drainage pattern of the Project site, and development would include modular wetlands and CMP detention basins that would ensure that any pollutants would be treated and prevented from reaching downstream receiving waters, consistent with the requirements of the Riverside County MS4 Permit. The modular wetlands and CMP detention basins would be located above ground and would not be within the flood hazard zones (Zone A and Zone AE). In addition, as discussed above, the Onsite Development Area, which would consist of the proposed warehouses and associated pollutants of concern, is entirely within Zone X and would not be subject to significant flooding hazards. In addition, the portion of the Project site designated as having a potential flood hazard (Zone A and Zone AE) would consist of the Restoration Area, would not include any habitable structures, and would not generate any pollutants of concern during operation. As such, compliance with the Riverside County MS4 Permit, as required by RCM WQ-3, would ensure the proposed Project would not result in the release of pollutants due to flooding during operation.

In addition, and though not required as a part of the CEQA analysis pursuant to the *CEQA Guidelines,* according to the DWR Division of Safety of Dams, the Project site is not located within

[47] Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (FIRM) No. 06065C2028G. August 28,.

a dam inundation area.[48] Therefore, the proposed Project would not result in the release of pollutants due to flooding caused by a dam failure.

Tsunami. The Project site is over 24 miles northeast of the Pacific Ocean, and the Santa Ana Mountains are between the Project site and the Pacific Ocean. Based on the distance from the Pacific Ocean and the presence of an intervening mountain range, the Project site would not be susceptible to inundation from a tsunami, and there is no risk of a release of pollutants from the Project site during a tsunami.

Seiches. Seiches are oscillations in enclosed bodies of water (e.g., a bay, lake, or harbor) that are caused by a number of factors, most often wind or seismic activity. Seiches go up and down or oscillate and do not progress forward like standard ocean waves. The nearest sizeable, enclosed body of water to the Project site is Lake Elsinore, which is approximately 1.4 miles south of the Project site. Because the impacts of seiches are highly localized and all pollutants of concern would be properly stored during construction and operation, the risk of release of pollutants from the Project site due to seiche-related flooding would be low.

The Project site is not within a tsunami or seiche zone, and the Onsite Development Area, where the warehouse buildings and associated parking areas are proposed, is not within a flood hazard zone. Therefore, implementation of the proposed Project would not result in the release of pollutants from a flood, dam inundation, tsunami, or seiche. With adherence to RCMs WQ-1, WQ-2, and WQ-3, including the development of two modular wetlands basins, two CMP detention basins, and associated stormwater infrastructure at the Project site that would treat stormwater and address the volume and rate of stormwater flows, impacts due to Project inundation would be **less than significant**, and mitigation is not required.

Threshold 3.10.5: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant. The Project site is within the jurisdiction of the Santa Ana RWQCB. The Santa Ana RWQCB adopted a Water Quality Control Plan (i.e., Basin Plan) that designates beneficial uses for all surface and groundwater within its jurisdiction and establishes the water quality objectives and standards necessary to protect those beneficial uses. The proposed Project would comply with the Construction General Permit and the existing Riverside County MS4 Permit, which requires preparation of a SWPPP, preparation of a Final WQMP, and implementation of construction and operational BMPs to reduce pollutants of concern in stormwater runoff. Therefore, the proposed Project would not result in water quality impacts that would conflict with the Santa Ana RWQCB Basin Plan. Impacts related to a conflict with or obstruction of the implementation of a water quality control plan would be **less than significant**, and no mitigation is required.

SGMA was enacted in September 2014. SGMA requires governments and water agencies located within high- and medium-priority groundwater basins to halt overdraft of the basins. SGMA requires

[48] California Department of Water Resources, Division of Safety of Dams. n.d. *Dam Breach Inundation Map Web Publisher.* Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed December 2024).

the formation of local GSAs, which are required to adopt GSPs to manage the sustainability of the groundwater basins. The Project site is within the boundaries of the Elsinore Valley Subbasin of the Elsinore Groundwater Basin, which DWR designates as a medium-priority basin. The GSA identified for the Elsinore Valley Subbasin is EVMWD.

The Elsinore Valley Subbasin GSP[49] was finalized in January 2022. The goal of the GSP is to manage groundwater resources in a way that facilitates long-term, sustainable use of the groundwater of the Elsinore Valley Subbasin. The five sustainability criteria relevant to the Elsinore Valley Subbasin as guided by this goal include: (1) Chronic Lowering of Groundwater Levels; (2) Reduction of Groundwater Storage; (3) Degraded Water Quality; (4) Land Subsidence; and (5) Depletion of Interconnected Surface Water.

The GSP identifies five projects and two management actions to support the implementation efforts of the GSP. Management actions consist of managing pumping with in-lieu recharge due to conjunctive use agreements and rotating pumping locations and flows. Projects consist of well replacements, groundwater pumping in the Lee Lake management area for municipal use, recycled water indirect potable reuse, septic tank conversions, and shallow monitoring well installation.[50] These projects and management actions would be implemented by the members of the GSA, and development of the proposed Project would not conflict with or preclude implementation of these projects and management actions.

In addition, as previously discussed, the proposed Project would not substantially contribute to groundwater depletion as the EVMWD has determined it would have adequate supply to meet the projected water demand, and the proposed Project is already accounted for in the water (groundwater) supply and demand scenarios analyzed by EVMWD. In addition, the proposed Project would not interfere with groundwater recharge, as recharge of stormwater from the Project site would still occur within the Restoration Area and Temescal Creek, similar to existing conditions.

Therefore, the proposed Project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan, and impacts would be **less than significant**. No mitigation is required.

3.10.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts related to hydrology and water quality.

3.10.8 Regulatory Compliance Measures and Mitigation Measures

The following regulatory compliance measures are applicable to the proposed Project.

RCM WQ-1 **Construction General Permit and Chapter 14.08 of the City of Lake Elsinore Municipal Code.** Prior to commencement of construction activities, the Project Applicant shall obtain coverage under the State Water Resources

[49] Elsinore Valley Municipal Water District. 2022. Elsinore Valley Subbasin Groundwater Sustainability Plan. January.

[50] Ibid.

Control Board's (SWRCB) *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, *NPDES No. CAS000002, Order No. 2022-0057-DWQ* (Construction General Permit), or any other subsequent permit. This shall include submission of Permit Registration Documents (PRDs), including permit application fees, a Notice of Intent (NOI), a risk assessment, a site plan, a Stormwater Pollution Prevention Plan (SWPPP), a signed certification statement, and any other compliance-related documents required by the Construction General Permit, to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS). Construction activities shall not commence until a Waste Discharge Identification Number (WDID) is obtained for the Project from the SMARTS and provided to the Director of the City of Lake Elsinore Public Works Department, or designee, to demonstrate that coverage under the Construction General Permit has been obtained and the Project is in compliance with Chapter 14.08 of the City of Lake Elsinore Municipal Code. Project construction shall comply with all applicable requirements specified in the Construction General Permit, including but not limited to: preparation of a SWPPP and implementation of construction site Best Management Practices (BMPs) to address all construction-related activities, equipment, and materials that have the potential to impact water quality for the appropriate risk level identified for the Project. The SWPPP shall identify the sources of pollutants that may affect the quality of stormwater and shall include BMPs (e.g., sediment control, erosion control, and good housekeeping BMPs) to control the pollutants in stormwater runoff. Upon completion of construction activities and stabilization of the Project site, a Notice of Termination shall be submitted via SMARTS.

RCM WQ-2 **Groundwater Discharge Permit.** At least 45 days prior to groundwater dewatering activities, the Project Applicant shall submit an NOI to the Santa Ana Regional Water Quality Control Board (RWQCB) to obtain coverage under the Santa Ana RWQCB's *General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (de minimis) Threat to Water Quality, Order No. R8-2020-0006, NPDES No. CAG998001* (Groundwater Discharge Permit). The construction contractor shall comply with the requirements of Order No. R8-2020-0006, NPDES No. CAG998001. Groundwater dewatering activities shall comply with all applicable provisions in the Groundwater Discharge Permit, including water sampling, analysis, treatment (if required), and reporting of dewatering-related discharges. Upon completion of groundwater dewatering activities, a Notice of Termination (NOT) shall be submitted to the Santa Ana RWQCB.

RCM WQ-3 **Riverside County MS4 Permit.** Prior to the issuance of a grading permit, the Project Applicant shall submit a Final Water Quality Management Plan (WQMP) to the City of Lake Elsinore Engineer/Public Works Director, or

designee, for review and approval. The Final WQMP shall specify the BMPs to be incorporated into the proposed Project design to target pollutants of concern in runoff from the Project site. The Final WQMP shall also incorporate the results of the Final Hydrology and Hydraulic Analyses to demonstrate that the detention facilities meet the hydromodification requirements of the *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024* (Riverside County MS4 Permit). The City Engineer/Public Works Director, or designee, shall ensure that the BMPs specified in the Final WQMP are incorporated into the final Project design.

RCM WQ-4 **Industrial General Permit.** Prior to issuance of a grading permit, the Project applicant shall certify and submit all PRDs for NOI and No Exposure Certification (NEC) coverage via the SWRCB's SMARTS website to obtain coverage under the Santa Ana Regional Water Quality Control Board's (RWQCB) *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. WQ 2014-0057-DWQ, as amended by Order No. WQ 2015-0122-DWQ and Order No. WQ 2018-0028-DWQ, NPDES No. CAS000001* (Industrial General Permit). The proposed BMPs to be incorporated into the proposed Project design shall comply with the requirements of the Industrial General Permit (e.g., capacity to capture and use, infiltrate, and/or evapotranspire up to and during the 85th percentile 24-hour precipitation event based on local, historical precipitation data). The capacity of the proposed LID BMPs shall be detailed in the Final WQMP prepared for the proposed Project.

The proposed Project would not result in any significant adverse impacts related to hydrology and water quality, and no mitigation is required.

3.10.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed Project related to hydrology and water quality, and no mitigation is required.

3.10.10 Cumulative Impacts

As defined in Section 15130 of the *State CEQA Guidelines,* cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for hydrology and water quality. Because the Project site is located in the Santa Ana River Watershed and the Temescal Basin Area and stormwater runoff from the Project site would discharge into water bodies within the Santa Ana River Watershed and the Temescal Basin Area, the cumulative impact area for hydrology and water quality related to the proposed Project is the Santa Ana River Watershed and the Temescal Basin Area. Cumulative development in the Santa Ana River Watershed and the Temescal Basin Area is a

continuation of the existing urban pattern of development that has already resulted in modifications to watercourses and drainage patterns in the area. The area's watercourses have been either channelized or left in natural conditions, and drainage systems have been put into place to respond to the past urbanization that has occurred in this area. Other projects in the Santa Ana River Watershed and the Temescal Basin Area could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff reaching the storm drain system and nearby watercourses, thereby resulting in cumulative impacts to hydrology and surface water quality. In addition, the construction and operation of these projects could result in localized degradation of groundwater quality that could eventually impair the underlying aquifer's continued use if pollutant discharge quantities are large enough. Cumulative impacts to groundwater supply could also occur due to increases in impervious surfaces that impair groundwater recharge and increases in consumptive uses of groundwater.

Past, present, and future projects, including the cumulative projects listed in Chapter 3 and shown on Figure 3-1, would be required to include BMPs to reduce construction- and operation-related impacts to water quality and hydrology in compliance with applicable NPDES permits and local plans and ordinances, including Chapter 14.08 of the City of Lake Elsinore Municipal Code. Specifically, all projects that disturb 1 acre or more of soil must comply with the requirements of the Construction General Permit and the Riverside County MS4 Permit. The preparation and approval of a SWPPP, erosion and sediment control plans (for construction), and a WQMP (for operation) would be required for all projects to determine the appropriate BMPs to treat potential water quality impacts and control the rate and volume of stormwater runoff. These projects would also be required to comply with Chapter 14.08 of the City of Lake Elsinore Municipal Code, Stormwater/Urban Runoff Management and Discharge Controls, which requires projects to obtain coverage under applicable NPDES permits, and would be required to demonstrate compliance with applicable General Plan goals and policies related to the protection of water resources and water quality in the city.

Future industrial projects in the city, including the Xebec Building Company Industrial Development and the North Elsinore Business Park, would be subject to the requirements of the Industrial General Permit, similar to the proposed Project. The Industrial General Permit authorizes discharges of industrial stormwater to receiving waters, so long as those discharges comply with all requirements, provisions, limitations, and prohibitions detailed in the Industrial General Permit. As required by the Industrial General Permit, the proposed LID BMPs would have sufficient capacity to capture and treat authorized nonstormwater sources and stormwater associated with industrial activities produced up to and during the 85th percentile 24-hour precipitation event based on local, historical precipitation data and records in order to support the attainment of water quality standards.

All projects must also consider and address impacts to impaired receiving waters and TMDLs for receiving waters. The TMDL program is a cumulative approach to identifying all constituents that adversely affect the beneficial uses of water bodies and then identifying appropriate reductions in pollutant loads or concentrations from all sources so that the receiving waters can maintain/attain the beneficial uses in the Basin Plan. Thus, by complying with TMDLs, a project's cumulative impacts to overall surface water quality in the Santa Ana River Watershed are taken into account. In addition, the preparation and approval of a Project-specific hydrology and water quality study would be required to determine the hydrologic control required to minimize increases in runoff from each site

so they do not exceed existing conditions or result in hydromodification impacts. Moreover, the City reviews development projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

Past, present, and future projects (including the cumulative projects listed in Chapter 3) within the boundaries of the Elsinore Valley Groundwater Subbasin would also be subject to the Elsinore Valley Groundwater Subbasin GSP and the Groundwater Discharge Permit, if groundwater dewatering is required. Additionally, large-scale projects would be required to prepare a WSA to determine if adequate water supplies would be available to support additional development during normal, dry-year, and multiple-dry-year demands so as not to contribute to the depletion of water within the groundwater basins. Furthermore, the Riverside County MS4 Permit Program requires the incorporation of LID techniques that mimic a project site's natural hydrology by using design measures that capture, filter, store, evaporate, detain, and infiltrate runoff rather than allowing runoff to flow directly to piped or impervious storm drains, thereby offsetting any negative impacts to groundwater quality and groundwater recharge that could result from increasing impervious surfaces.

Regional programs and BMPs, such as TMDL programs and the Riverside County MS4 Permit Program, have been designed to address the cumulative effects of proposed development. The proposed Project would be required to comply with the requirements of the Construction General Permit, Groundwater Discharge Permit, and Riverside County MS4 Permit and to implement construction and operational BMPs to reduce pollutants in stormwater runoff and address the volume of post-project stormwater runoff. Compliance with these regional programs and permits constitutes compliance with programs intended to address cumulative water quality impacts. As stated above, future projects would be required to develop a Project-specific SWPPP, erosion and sediment control plans, a WQMP, and a hydrology study, and would be evaluated individually to determine appropriate BMPs and treatment measures to reduce impacts to surface water quality and hydrology. Because the proposed Project could convey runoff to biotreatment LID BMPs (modular wetlands and CMP detention basins) that have been designed to maintain water quality, provide infiltration, and comply with applicable NPDES requirements, the Project's potential impacts are less than cumulatively considerable. Likewise, other projects within the watershed and city would include BMPs to reduce the volume of stormwater runoff and pollutants of concern in stormwater runoff. Overall, the cumulative hydrology and water quality impacts of the proposed Project and the related projects would be **less than cumulatively considerable**.

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3.11 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (EIR) describes the existing land uses on the Project site and in its vicinity and evaluates the compatibility of the proposed Project with surrounding land uses and relevant policy and planning documents. This section is based, in part, on information provided in the City of Lake Elsinore (City) General Plan, the City of Lake Elsinore Land Use Plan, and applicable provisions of the City of Lake Elsinore Municipal Code.

3.11.1 Scoping Process

Potential impacts related to land use and planning were identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received two comment letters in response to the Notice of Preparation (NOP), which was circulated between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to land use and planning. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to land use and planning included comments from the following:

- Jefrey Ong, August 10, 2024, suggesting that the industrial land uses proposed under the Project would be inconsistent with nearby residential neighborhoods.

- Christie Vosburg, Deputy Attorney General, for Rob Bonta, California Department of Justice's Bureau of Environmental Justice (July 17, 2024), requesting that the Draft EIR prioritize avoiding land use conflicts between warehouses and sensitive receptors over mitigating the impacts of any unavoidable land use conflicts.

3.11.2 Methodology

The impact analysis presented in this section evaluates potential physical impacts of the proposed Project on land use compatibility and considers whether the proposed Project would physically divide an established community or result in a conflict with relevant land use plans, policies, or regulations contained in applicable planning documents adopted by the City and other agencies for the purpose of avoiding or mitigating an environmental effect that could cause a significant environmental impact.

This section also analyzes the proposed Project's consistency with applicable land use plans. A Project's inconsistency with a plan or policy is only considered significant if such inconsistency would result in a significant physical environmental impact.[1] This EIR section determines whether or not the proposed Project would conflict with any adopted land use policies or programs that would result in such an impact. Pursuant to the *California Environmental Quality Act (CEQA) Guidelines,* a policy or program conflict is not in and of itself considered a significant environmental impact.[2] An inconsistency between the proposed Project and an applicable plan is a legal determination that may or may not indicate the likelihood of an environmental impact. In some cases, an inconsistency may result in an underlying physical impact that is significant and adverse.

1 *State CEQA Guidelines* Section 15382.
2 Ibid.

3.11.3 Existing Environmental Setting

The Project site is located southwest and southeast of the intersection of Baker Street and Pierce Street in the northwestern portion of the city of Lake Elsinore, in Riverside County, California. The Project site is undeveloped, irregular in shape and generally bounded by undeveloped land in all directions; however, existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) respectively along the northwest and southeast sides of Pierce Street, and a nonconforming residence is located outside of and adjacent to the southeast corner of the Project site along Baker Street. Collier Avenue, followed by commercial uses and then Interstate (I-)15, are located east of the Project site, and residential uses are located southwest of the Project site. All the existing residential and institutional uses are outside the Project site limits. A paving and building materials supplier/mineral resources extraction site (Martin Marietta – Lake Elsinore Asphalt and Chandler Aggregates, Inc – Nichols Road) is located northeast of the Project site, across I-15. The Project site consists of undeveloped land and public road rights-of-way (ROWs) and has a history of limited agriculture use. No agricultural uses currently exist on the site. The Project site includes a segment of Nichols Road, Pierce Street, and Baker Street.

The Project site has current General Plan land use designations of Limited Industrial and Floodway. As shown on Figure 2-8 in Chapter 2.0, Project Description, the Project site is currently zoned Limited Manufacturing (M-1), General Manufacturing (M-2), and Open Space/Floodway (OS). As it relates to the proposed Project, the Limited Industrial land use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses"[3] at a maximum floor area ratio (FAR) of 0.45. The intent of the M-1 zoning district is to reserve appropriate locations for certain categories of light industrial uses that are relatively free of nuisance or hazardous characteristics,[4] and the intent of the M-2 zoning district is to reserve appropriate locations for a full range of industrial, manufacturing, and related establishments in order to strengthen the City's economic base and increase employment opportunities.[5] The OS zoning district identifies areas of the city that are not suited for residential or other intensive use for the reason that they may endanger the health, safety, and welfare of persons due to flooding, fire, or erosion, and those areas designated to allow citizens to pursue recreational activities.[6]

Table 3.11.A provides the General Plan land use designations and zoning districts for adjacent properties.

[3] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan. Chapter 2.0, Community Form, City of Lake Elsinore Land Use Plan. Page 2-17. December 13.

[4] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.136: M-1 Limited Manufacturing District. Accessed July 12, 2024.

[5] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.140: M-2 General Manufacturing District. Accessed July 12, 2024.

[6] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.100: (OS) Open Space District. Accessed July 12, 2024.

Table 3.11.A: Existing General Plan and Zoning Designations of the Project Site and Adjacent Properties

Direction from Project Site	General Plan Land Use Designation	Zoning District
Project Site	Limited Industrial	Limited Manufacturing (M-1)
		General Manufacturing (M-2)
	Floodway	Open Space/Floodway (OS)
Northeast	Specific Plan (Outlet Center)	Specific Plan (Outlet Center)
	Floodway	Open Space/Floodway (OS)
Southeast	Limited Industrial	Limited Manufacturing (M-1)
	Public Institutional	Public/Institutional (PI)
	Floodway	Open Space/Floodway (OS)
Northwest	Residential Mixed Use	Residential Mixed Use (RMU)
Southwest	Low-Medium Residential	Single-Family Residential (R1)
	Hillside Residential	Hillside Single-Family Residential (RH)

Source 1: City of Lake Elsinore, City of Lake Elsinore General Plan, Chapter 2.0, Community Form, City of Lake Elsinore Land Use Plan, Figure 2.1A (December 13, 2011).
Source 2: City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning.

3.11.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.11.4.1 Federal Policies and Regulations

There are no federal regulations applicable to the proposed Project regarding land use and planning.

3.11.4.2 State Policies and Regulations

California State Planning and Zoning Law. This law, which is codified in California Government Code Sections 65000–66342, delegates most of the State's local land use and development decisions to cities and counties. The California Government Code establishes specific requirements pertaining to the regulation of land uses by local governments, including general plan requirements, specific plans, subdivisions, and zoning. California Government Code Section 65302 requires that all California cities and counties include the following seven elements in their general plans: land use, circulation, housing, conservation, open space, noise, and safety. Cities and counties within the South Coast Air Quality Management District (SCAQMD) must also address air quality in their general plans. Cities and counties that have identified disadvantaged communities must also address environmental justice (EJ) in their general plans, including air quality.[7]

Sustainable Communities and Climate Protection Act of 2008 (Senate Bill 375). Senate Bill (SB) 375 was enacted to reduce greenhouse gas (GHG) emissions from automobiles and light trucks through integrated transportation, land use, housing, and environmental planning. SB 375 requires California's

[7] Senate Bill 1000 (SB 1000), adopted in 2016, requires both cities and counties that have disadvantaged communities to incorporate environmental justice (EJ) policies into their general plans, either in a separate EJ element or by integrating related goals, policies, and objectives throughout the other elements. This update, or revision if the local government already has EJ goals, policies, and objectives, must happen "upon the adoption or next revision of two or more elements concurrently on or after January 1, 2018."

regional planning agencies to include a Sustainable Communities Strategy (SCS) or an Alternative Planning Strategy (APS)[8] in their Regional Transportation Plans (RTPs). The SCS provides a plan for meeting the regional emissions reduction targets established by the California Air Resources Board (CARB). SB 375 also offers local governments regulatory and other incentives to encourage more compact new development and transportation alternatives.

The requirements of SB 375 are reflected in the 2024 RTP/SCS adopted by the Southern California Association of Governments (SCAG), which serves as the regional planning agency in the six-county metropolitan region composed of Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial counties. The 2024–2050 RTP/SCS is discussed in further detail below.

Assembly Bill 98. Assembly Bill (AB) 98, approved by the Governor on September 29, 2024, amended the Planning and Zoning Law (Division 1 of Title 7 of the Government Code and the Health and Safety Code) to add regulations to new and expanded logistic uses and truck routes. This bill prescribes various statewide warehouse design and build standards that take effect on January 1, 2026, for any proposed new or expanded logistic use development, as specified, including, among other things, standards for building design and location, parking, truck loading bays, landscaping buffers, entry gates, and signage. AB 98 would also require a facility operator, prior to the issuance of a certificate of occupancy, to establish and submit for approval by a city, county, or city and county a truck routing plan to and from the State highway system based on the latest truck route map of the city, county, or city and county, as prescribed. AB 98 requires facility operators to enforce these routing plans.

3.11.4.3 Regional Policies and Regulations

The Project site is covered by several planning documents and programs that have varying degrees of regulation over use of the Project site. The following paragraphs discuss regional regulations, plans, and policies applicable to the Project site that are analyzed in this EIR section.

Southern California Association of Governments. As discussed above, regional planning in Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial counties is conducted by SCAG. SCAG is also the federally designated Metropolitan Planning Organization (MPO) for these six counties. As the designated MPO, SCAG is mandated by the federal government to research and prepare plans for transportation, a growth forecast, hazardous waste, and air quality. The growth forecast serves as the foundation of these plans. Of the various plans adopted by SCAG, the Regional Comprehensive Plan and the 2024 RTP/SCS are relevant to the proposed Project.

Regional Comprehensive Plan and Guide. In 2008, SCAG adopted the Regional Comprehensive Plan (RCP) for the purpose of providing a comprehensive strategic plan for defining and solving housing, traffic, water, air quality, and other regional challenges. The 2008 RCP has two primary objectives in implementing this strategic plan: (1) integrating transportation, land use, and air quality planning approaches; and (2) outlining key roles for public- and private-sector stakeholders to implement reasonable policies regarding transportation, land use, and air quality

[8] If the emissions reduction targets cannot be met through the SCS, an APS must be prepared that demonstrates how the reduction targets would be achieved through alternative development patterns, infrastructure, or additional transportation measures or policies. (See California Government Code Section 65080(b)(2)(I).)

approaches. While the 2008 RCP outlines several policies to inform local decision-makers within the SCAG region with respect to policy and planning decisions, these policies are considered recommendations and are not mandated by law. With respect to land use policy, the 2008 RCP includes a Land Use and Housing chapter that aims to link land use and transportation planning decisions to the projected population and economic growth in the SCAG region. Specifically, the Land Use and Housing chapter of the 2008 RCP promotes sustainable planning for land use and housing in the SCAG region by maximizing the efficiency of the existing circulation network, providing a greater variety in housing types, promoting a diverse and growing economy, and protecting the existing natural environment.

Regional Transportation Plan/Sustainable Communities Strategy. On April 4, 2024, SCAG adopted its 2024 RTP/SCS, titled Connect SoCal 2024. The 2024 RTP/SCS provides an update to the long-range planning document that provides a common foundation for regional and local planning, policymaking, and infrastructure goals in the SCAG region.[9] The horizon year for the 2024 RTP/SCS is 2050. The core vision for the 2024 RTP/SCS is to increase mobility options and achieve a more sustainable growth pattern. The goals of the 2024 RTP/SCS are designed to achieve this vision and fall into four core categories, including mobility, communities, environment, and economy, as described below:

- **Mobility:** Build and maintain an integrated multimodal transportation network.
- **Communities:** Develop, connect, and sustain communities that are livable and thriving.
- **Environment:** Create a healthy region for the people of today and tomorrow.
- **Economy:** Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all residents.

The 2024 RTP/SCS outlines the challenges facing the region, shared goals and policies, and transportation investments and land use strategies and policies to meet GHG reduction targets and deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel time reliability, air quality, economic productivity, EJ, and transportation.

3.11.4.4 Local Policies and Regulations

City of Lake Elsinore General Plan. The General Plan is a comprehensive plan intended to guide the physical development of the city, and it serves as a blueprint for future growth and development. The City of Lake Elsinore adopted its current General Plan on December 13, 2011. The General Plan's planning horizon is 2030. As a blueprint for the future, the General Plan contains policies and programs designed to provide decision makers with a solid basis for decisions related to land use and development. Table 3.11.C, provided later in this section, provides a list of the goals and policies contained in the City of Lake Elsinore General Plan that are applicable to the Project.

[9] Southern California Association of Governments. April 2024. RTP/SCS. Website: https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (accessed July 16, 2024).

Chapter 2.0, Community Form, of the City's General Plan outlines where and how the city of Lake Elsinore will develop. The proposed Project would be required to comply with applicable land use designations outlined in the City's General Plan, including Limited Industrial and Floodway, which apply to the Project site.

City of Lake Elsinore Municipal Code. The City's Municipal Code provides a comprehensive library of the local laws, regulations, and ordinances governing the City. The City of Lake Elsinore's Zoning Code is located in Title 17 of the City's Municipal Code and is the primary tool for implementing the City's General Plan. The City's Zoning Code includes use regulations and development standards, including, but not limited to, zone-specific height limits, setback requirements, landscape requirements, and parking regulations.

Chapters 17.100, Open Space District, 17.136, M-1 Limited Manufacturing District, and 17.140, M-2 General Manufacturing District, of the Lake Elsinore Municipal Code establish the purpose, permitted uses, and development/design standards for the OS, M-1, and M-2 zones, respectively, which comprise the Project site. Refer to Table 3.11.B for a consistency analysis of the proposed Project with the M-2 development standards, which would be applicable to the Onsite Development Area.

City of Lake Elsinore "Good Neighbor Policy" for Warehousing, Logistics, and Distribution Uses. The City of Lake Elsinore adopted the "Good Neighbor Policy" (Policy No. 400-16) on April 25, 2023, to provide a framework for larger-scale warehousing, logistics, and distribution projects to be designed and operated to mitigate potential negative impacts on residences and/or other sensitive land uses in order to maintain quality of life; protect public health, safety, and welfare; and ensure orderly development in the city.[10] The policy also works to preserve and advance the City Council's vision as set forth in the City's General Plan and Dream Extreme 2040 Plan.[11] The policy is meant to apply Best Management Practices (BMPs) to help minimize potential impacts to sensitive receptors and will be used in addition to applicable requirements of the City's Zoning Code and CEQA. The policy applies to warehousing, logistics, and distribution land uses, and specifically to industrial buildings that are 250,000 square feet in size or larger. "Warehousing, logistics and distribution facility" means those facilities used for the storage and/or consolidation of manufactured goods and/or raw materials (before their distribution to retail locations or other off-site facilities.

Building 1 totals 212,028 square feet and Building 2 totals 788,423 square feet. Therefore, as detailed in Appendix K, the Good Neighbor Policy is applicable only to Building 2, which would be designed, constructed, and operated in accordance with applicable portions of the City of Lake Elsinore's Good Neighbor Policy.[12] A discussion of the Project's consistency with the City's Good Neighbor Policy is presented below in Table 3.11.E.

[10] City of Lake Elsinore. 2023. "Good Neighbor Policy" for Warehousing, Logistics, and Distribution Uses, Policy No. 400-16. Effective April 25, 2023.

[11] The City of Lake Elsinore's Dream Extreme 2040 Plan serves as a programmatic vision document that identifies strategies to achieve the City's long-term goals and outlines ways in which the City's progress toward meeting its goals can be measured.

[12] Riverside Legacy IV Nichols Road, LLC. 2024. *Baker Street, Warehouse Project (PA-2020-103) Good Neighbor Policy Consistency Memo.* September 19. (Appendix K).

3.11.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Thresholds of Significance.* Based on these thresholds, implementation of the proposed Project would have a significant adverse impact related to land use and planning if it would:

Threshold 3.11.1: Physically divide an established community; or

Threshold 3.11.2: Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

3.11.6 Project Impacts

Threshold 3.11.1: Would the project physically divide an established community?

Less Than Significant Impact. The physical division of an established community typically refers to the construction of a physical feature (such as a limited-access highway or railroad tracks) or removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying area. For instance, the construction of a limited-access highway or railroad track through an existing community may constrain travel from one side of the community to another; similarly, such construction may also impair travel to areas outside the community.

The Project site is irregular in shape and generally bounded by roadway ROWs and undeveloped land in all directions; however, existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) respectively along the northwest and southeast sides of Pierce Street, and a nonconforming residence is located outside of and adjacent to the southeast corner of the Project site along Baker Street. The proposed Project includes a zone change to amend the zoning of the M-1 portion of the Onsite Development Area to M-2 for zoning consistency and would develop the Onsite Development Area with industrial warehouse uses consistent with the intent of the Limited Industrial General Plan designation and M-2 zoning district.

Access to the existing residential uses would be maintained with development of the proposed Project. The two single-family homes located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area), respectively along the northwest and southeast sides of Pierce Street, would continue to be accessible from Pierce Street, and the residence located outside of and adjacent to the southeast corner of the Project site along Baker Street would continue to be accessible from Baker Street. In addition, the portion of the Project site designated as Floodway in the General Plan and zoned OS would be maintained as part of the proposed Restoration Area. Within the Offsite Improvement Area, the Project would include ROW improvements on Baker Street and Pierce Street consistent with the General Plan Circulation Element, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs. These improvements would enhance circulation in the Project vicinity and would not introduce any new physical barriers. Therefore, implementation of the proposed Project would be consistent with the planned development pattern of the city and would not physically divide an established community.

In addition, proposed Project improvements would occur within the Onsite Development Area and the Offsite Improvement Area. As discussed above, improvements within the Offsite Improvement Area would be limited to existing roadways and infrastructure. No additional off-site infrastructure improvements outside the Offsite Improvement Area would occur or be needed to serve the proposed Project. The proposed Project would not require the construction of any new infrastructure that would divide an established community and would not remove any means of access to existing uses in the city. Therefore, the proposed Project would not result in a physical division of an established community or adversely affect the continuity of land use patterns in the vicinity. Impacts would be less than significant and no mitigation is required.

Threshold 3.11.2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant with Mitigation Incorporated. The Project site has General Plan land use designations of Limited Industrial and Floodway and M-1, M-2, and OS zoning districts. As it relates to the proposed Project, the Limited Industrial land use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses" at a maximum FAR of 0.45. The intent of the M-1 zoning district is to reserve appropriate locations for certain categories of light industrial uses that are relatively free of nuisance or hazardous characteristics,[13] and the intent of the M-2 zoning district is to reserve appropriate locations for a full range of industrial, manufacturing, and related establishments in order to strengthen the City's economic base and increase employment opportunities.[14] The OS zoning district identifies areas of the city that are not suited for residential or other intensive use for the reason that they may endanger the health, safety, and welfare of persons due to flooding, fire, or erosion, as well as areas designated to allow citizens to pursue recreational activities. [15]

Pursuant to *CEQA Guidelines* Section 15206(b)(2)(E), the Project is considered a Project of Statewide, Regional, or Areawide Significance because it includes industrial development occupying more than 40 acres of land and encompasses more than 650,000 square feet of floor area. As detailed in Table 3.11.C, the Project is consistent with the City of Lake Elsinore General Plan goals and policies related to air quality. The City's General Plan is consistent with the SCAG RCP Guidelines and the SCAQMD 2022 Air Quality Management Plan (AQMP). As the Project is consistent with the Lake Elsinore General Plan, which is consistent with the SCAG RCP Guidelines and the SCAQMD 2022 AQMP, the proposed Project would be consistent with the 2022 AQMP as it relates to land use and planning. However, Project operation would exceed the daily SCAQMD emissions threshold for nitrogen oxides (NO_X); therefore, the Project would be inconsistent with the 2022 AQMP as it relates specifically to criteria pollutant emissions, as detailed in Section 3.3, Air Quality.

[13] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.136: M-1 Limited Manufacturing District. Accessed July 12, 2024.

[14] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.140: M-2 General Manufacturing District. Accessed July 12, 2024.

[15] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.100: (OS) Open Space District. Accessed July 12, 2024.

As previously stated, the proposed Project includes a zone change to amend the zoning of the M-1 portion of the Onsite Development Area to M-2 for zoning consistency and would develop the Onsite Development Area with industrial warehouse uses consistent with the intent of the Limited Industrial General Plan designation and M-2 zoning district. Specifically, the proposed Project would develop the Onsite Development Area with a 212,028-square-foot warehouse (Building 1) with 5,000 square feet of ground-level office space and a 5,000-square-foot office mezzanine; a 788,423-square-foot warehouse (Building 2) with 10,000 square feet of ground-level office space and a 10,000-square-foot office mezzanine; 23.04 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.73-acre construction/improvements buffer between Baker Street and the Restoration Area. Table 3.11.B provides an M-2 development standards consistency analysis for the two proposed buildings.

Table 3.11.B: Consistency with M-2 Development Standards

Development Standard	Required	Provided	
		Building 1	Building 2
Parking	1,000 parking spaces[1]	466 vehicle parking spaces and 391 trailer parking spaces = total of 857 spaces	
FAR	0.45	0.39	0.34
Maximum Structure Height	45 feet	50 feet	
Front Setback to Building or Parking Area	Shall average 20 feet, but not be less than 15 feet	15 feet from parking lot, 95 feet from building	24 feet from parking lot, 147 feet from building
Interior Setback	N/A, unless adjacent to residential use or public ROW, in which case the front setback requirement applies	48 feet from parking lot, 98 feet from building	181 feet from building
Landscape Coverage	12%	25.94%	32.2%

Source: City of Lake Elsinore, Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.148: Parking Requirements (accessed July 12, 2024).
City of Lake Elsinore, Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.140: M-2 General Manufacturing District. (accessed July 12, 2024).

[1] Based on the following standards
- Office: 1 space per 250 SF
- Warehouse 1-20,000 SF: 1 space per 500 SF
- Warehouse 20,001 SF +: 1 space per 1,000 SF

FAR = floor area ratio
N/A = not appliable
ROW = right-of-way
sf = square foot/feet

As shown in Table 3.11.B, the proposed Project would be consistent with the FAR, setback, and landscape coverage development requirements of the M-2 zoning district, but it would not meet the required number of parking spaces and would exceed the maximum structure height of 45 feet. However, the Parking Demand Analysis[16] prepared for the proposed Project was approved by the City to allow for the reduction of required parking spaces. As stated in the parking study, the proposed Project would be subject to the following parking requirements: one parking space per 1,000 square feet of floor area for the first 40,000 square feet, one parking space for each 4,000 square feet of floor area for the portion over 40,000 square feet, and one parking space for each facility vehicle. Applying these parking requirements, the proposed Project would require approximately 310 parking spaces. As the proposed Project would include 466 vehicle parking spaces and 391 trailer parking spaces, the

[16] EPD Solutions, Inc. 2024. *Parking Demand Analysis for the Proposed Baker Street Industrial Project.* May 22.

proposed Project would be consistent with the number of required parking spaces agreed upon by the City.

Also, with approval of the proposed Conditional Use Permit (CUP), the maximum allowable structure height would be increased from 45 to 50 feet, as allowable under the Section 17.140.030 of the City's Municipal Code. Therefore, the proposed Project would be consistent with applicable height requirements. In addition, the portion of the Project site designated as Floodway in the General Plan and zoned OS would be maintained as part of the proposed Restoration Area. Therefore, the proposed Project would be consistent with the development standards for the Project site and would not 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.

The proposed Project also includes ROW improvements along Pierce Street and Baker Street. The existing Pierce Street ROW varies in width along the Project's frontage. The ultimate ROW for Pierce Street is 60 feet and the ultimate street section would include a 6-inch curb, standard gutter, 6-foot-wide sidewalk within an overall 10-foot parkway, and 20 feet of pavement from centerline to lip-of-gutter on each side of the street. Pierce Street would also be improved southwest of the Project frontage to connect to Hoff Avenue, creating a second means of emergency access. This section of the ROW would be paved, creating a 24-foot-wide roadway.

Baker Street is currently an unimproved dirt road with a 60-foot-wide ROW. The proposed Project would dedicate an additional 4 feet of ROW on each side of Baker Street to meet the ultimate 68-foot-wide ROW required by the City's Collector roadway designation. The ultimate roadway section would include a 6-inch curb, a standard gutter, a 6-foot-wide sidewalk within an overall 10-foot parkway, and 24 feet of pavement from centerline to lip-of-gutter on each side of the street. Baker Street would also be elevated an average of 5 feet above its existing elevation to support drainage conveyance and flood protection of the ROW and would be extended to connect to Nichols Road. A permanent lift station would replace the temporary lift station at the intersection of Pierce Street and Nichols Road. The proposed Project is accounted for in the lift station's preliminary Design Report approved by the Elsinore Valley Municipal Water District. Overall, the proposed ROW improvements along Pierce Street and Baker Street would be consistent with the roadway designations in the City's General Plan and would not 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.

City of Lake Elsinore General Plan Goals and Policies. Table 3.11.C compares the proposed Project to the applicable policies and goals of the City of Lake Elsinore General Plan.

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Chapter 2.0: Community Form	
Section 2.3: Land Use	
Goal 1: Create a diverse and integrated balance of residential, commercial industrial, recreational, public and open space land uses.	
Policy 1.1: Promote innovative site design, and encourage the preservation of unique natural features, such as steep slopes, watercourses, canyons, ridgelines, rock formations, and open space with recreational opportunities.	**Consistent.** The majority of the Project site is currently undeveloped, with naturally occurring vegetation consisting of low-lying shrubs and grasses. The Project site has a sloping topography from the southwest portion of the site to the northeast portion of the site; however, no steep slopes are present on the Project site. In addition, the Project site does not contain any other unique natural features, such as watercourses, canyons, ridgelines, rock formations, or open space with recreational opportunities. Therefore, no conflict with this policy would occur.
Policy 1.4: Encourage development of a mix of industrial uses including light industrial, clean manufacturing, technology, research and development, medium industrial, and extractive uses.	**Consistent.** The proposed Project would develop the Onsite Development Area with industrial warehouse uses, which would expand the mix of industrial uses in the city. Therefore, no conflict with this policy would occur.
Policy 1.5: Encourage the development of large planned industrial and/or professional office parks on large parcels.	**Consistent.** The proposed Project would develop the site with 1,000,451 square feet of industrial warehousing space on a 140.04-acre Project site that consists of 23 parcels. As such, the proposed Project constitutes a large planned industrial development on large parcels. Therefore, no conflict with this policy would occur.
Policy 1.8: Encourage a jobs/housing balance of one job for every 1.05 households by the year 2030.	**Consistent.** As described in Section 3.14, Population and Housing, the 483 new permanent employees proposed under the Project would represent an approximately 2.9 percent increase in the City's total employment. The addition of these employees would improve the City's jobs-to-housing ratio and help the City meet this policy's jobs-to-housing ratio goal of 0.95:1 (i.e., one job for every 1.05 households) by the year 2030. With the addition of the 483 new permanent employees for the proposed Project, the City's jobs-to-housing ratio would increase slightly to 0.86:1 (based on 2019 data). These 483 jobs would represent approximately 8% of the 6,000 jobs anticipated to be created within the city between 2019 and 2050. Therefore, no conflict with this policy would occur.
Goal 3: Establish a development pattern that preserves aesthetics and enhances the environmental resources of the City.	
Policy 3.2: Encourage new commercial and/or industrial developments incorporate buffers which minimize the impacts of noise, light, visibility, or activity and vehicular traffic on residential uses and MSHCP conservation areas.	**Consistent.** Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area), respectively along the northwest and southeast sides of Pierce Street, and a single-family residence is located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Baker Street. All the existing residential uses are outside the Project site limits. The proposed Project would include landscape buffers along the perimeter of the Onsite Development Area, which would help minimize impacts on residential uses. In addition, the proposed Project is not adjacent to a MSHCP conservation area. The proposed Project includes a 33.65-acre restoration area to be used for future conservation and restoration activities and a 2.72-acre improvements buffer

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
	between Baker Street and the proposed restoration area to serve as a disturbance buffer. The improvements buffer would ensure ROW improvements and vehicle activity on Baker Street would not encroach into or impact the restoration area. Therefore, no conflict with this policy would occur.
Section 2.4: Circulation	
Goal 6: Optimize the efficiency and safety of the transportation system within the City of Lake Elsinore.	
Policy 6.2: Enforce and comply with proper intersection "sight distance" requirements as described by the Engineering Division.	**Consistent.** The proposed Project has been designed to ensure proper sight distances are in place for the proposed driveways. In addition, the existing utilities and locations of proposed utility connections, landscaping, and signage would not obstruct sight distances. Further, the City's Engineering Division will review the site plan to ensure no conflict with adequate sight distances occurs. Therefore, no conflict with this policy would occur.
Section 2.7: Parks and Recreation	
Goal 8: Maintain an adequate quantity, quality, type, and distribution of parks and recreational facilities throughout the city that serve the current and future needs of residents and visitors.	
Policy 8.2: Ensure parkland and recreation facilities support new development through acquisition and/or dedication. Meet the requirement of the Park Capital Improvements Fund, Resolution No. 91-42 and the Quimby Act by acquiring five (5) acres of usable park land per 1,000 population.	**Consistent.** As discussed in Section 3.16, Recreation, implementation of the proposed Project would not generate a substantial increase in population within the city. Accordingly, no negative impact related to the City's stated goal of 5 acres of parkland for every 1,000 residents would result from the proposed development. The increase in on-site population with implementation of the proposed Project would be associated with future employees, who would not be expected to use parks or recreational facilities in the vicinity of the Project site during Project operation. In addition, future employees are expected to come from the city or immediate surrounding areas and therefore are expected to already use city parks and recreational facilities. Therefore, the increased on-site population within the Onsite Development Area would not substantially increase demand on parks and recreational facilities, and the need for new or expanded park facilities would be negligible. In addition, pursuant to Chapter 16.74 of the City's Municipal Code, the Project developer would be required to pay development impact fees, which would fund capital improvements to City-operated recreational facilities within the city. Therefore, no conflict with this policy would occur.
Section 3.2: Air Quality	
Goal 1: Continue to coordinate with the Air Quality Management District and the City's Building Department to reduce the amount of fugitive dust that is emitted into the atmosphere from unpaved areas, parking lots, and construction sites.	
Policy 1.1: Continue to implement requirements identified in the National Pollutant Discharge Elimination System (NPDES).	**Consistent.** As discussed in Section 3.10, Hydrology and Water Quality, the proposed Project would be required to comply with applicable requirements of the NPDES permits, including obtaining coverage under the Construction General Permit and complying with the Riverside County MS4 Permit. Therefore, no conflict with this policy would occur.

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Section 3.3: Hazards and Hazardous Materials	
Goal 3: Reduce the level of risk associated with the use, transport, treatment, and disposal of hazardous materials to protect the community's safety, health, and natural resources.	
Policy 3.1: Continue to require hazardous waste generators to implement a waste reduction program per the Riverside County Hazardous Waste Management Plan with necessary inspections per the Riverside County Hazardous Materials Handlers Program.	**Consistent.** As discussed in Section 3.9, Hazards and Hazardous Materials, the transport, use, and disposal of hazardous materials during construction would be regulated by the RCFD and Cal/OSHA. Similar to Project construction, the transport, use, and disposal of hazardous materials during Project operation would be regulated by the RCFD and Cal/OSHA. In addition, Chapter 6.95 of the California Health and Safety Code requires all facilities with regulated hazardous materials to file required in the statewide information management system, or CERS. CERS is the only approved method for submitting required information to the Riverside County DEH and its participating agencies. HMBP information is made available to first responders in the county for emergency response activities. All handlers are required to disclose their inventory of hazardous materials in the form of an HMBP. Warehousing and industrial uses operated within the Onsite Development Area may handle or store hazardous materials along with limited use of pesticide and herbicides for landscape maintenance. Vehicles and trucks accessing the uses within the Onsite Development Area would contain oil and gasoline to power their engines, which could have the potential to result in minor releases of such substances through drips or leaks in parking areas. Transport truck traffic to and from the Onsite Development Area may also contribute to minor releases of oil and gasoline in loading dock areas in addition to the parking areas. Therefore, the proposed Project would be required to prepare an HMBP via CERS as described in **RCM HAZ-1** (provided in Section 3.9 of this document). Therefore, no conflict with this policy would occur.
Policy 3.3: Encourage the safe disposal of hazardous materials with County agencies to protect the City against a hazardous materials incident.	**Consistent.** As discussed in Section 3.9, Hazards and Hazardous Materials, the transport, use, and disposal of hazardous materials during construction would be regulated by the RCFD and Cal/OSHA. Similar to Project construction, the transport, use, and disposal of hazardous materials during Project operation would be regulated by the RCFD and Cal/OSHA.
Section 3.5: Wildfire Hazards	
Goal 4: Adhere to an integrated approach to minimizing the threat of wildland fires to protect life and property using pre-fire management, suppression, and post-fire management.	
Policy 4.1: Require on-going brush clearance and establish low fuel landscaping policies to reduce combustible vegetation along the urban/wildland interface boundary.	**Consistent.** As discussed in Section 3.20, Wildfire, the proposed Project would conform to applicable provisions of Chapter 7A of the CBC and the Project-specific Fire Protection Plan (Appendix P), including minimum 100-foot on-site and off-site equivalent fuel modification, pursuant to **RCM FIRE-2.** Further, pursuant to **MM FIRE-1**, the property owner shall annually ensure that fuel modification zones within the Project site are properly maintained in accordance with the Fire Protection Plan.

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Policy 4.2: Create fuel modification zones around development within high hazard areas by thinning or clearing combustible vegetation within 100 feet of buildings and structures. The fuel modification zone size may be altered with the addition of fuel resistant building techniques. The fuel modification zone may be replanted with fire-resistant material for aesthetics and erosion control.	**Consistent.** As discussed in Section 3.20, Wildfire, the proposed Project would conform to ignition-resistant building codes codified in Chapter 7A of the CBC, would be constructed of ignition-resistant materials, and would be designed to require minimal firefighting resources for protection through the inclusion of features such as Type 1 (Fire Resistive) tilt-up construction materials and a NFPA 13 commercial interior fire sprinkler system. Further, as discussed above with respect to Policy 4.1, the proposed Project would include minimum 100-foot on-site and off-site equivalent fuel modification pursuant to **RCM FIRE-2,** which would be maintained on a regular basis to ensure efficacy pursuant to **MM FIRE-1**.
Section 3.5: Flooding and Floodplains	
Goal 5: Minimize risk of injury to residents and visitors, and property damage due to flooding.	
Policy 5.1: Continue to ensure that new construction in floodways and floodplains conforms to all applicable provisions of the National Flood Insurance Program in order to protect buildings and property from flooding.	**Consistent.** According to FEMA FIRM No. 06065C2028G (effective August 28, 2008), approximately 78 percent of the Project site is mapped as within Zone X (area of minimal flood hazard and area with 0.2 percent annual chance of flood hazard), approximately 16 percent is within Zone A (special flood hazard area), and approximately 6 percent is within Zone AE (regulatory floodway).[1] Figure 3.10-1 depicts the flood hazard zones at the Project site. All portions of the proposed Project within Zone A and Zone AE would conform to applicable provisions of the National Flood Insurance Program in order to protect buildings and property from flooding. Therefore, no conflict with this policy would occur.
Section 3.6: Seismic Activity	
Goal 6: Minimize the risk of loss of life, injury, property damage, and economic and social displacement due to seismic and geological hazards resulting from earthquakes and geological constraints.	
Policy 6.2: Continue to require Alquist-Priolo and other seismic analyses be conducted for new development to identify the potential for ground shaking, liquefaction, slope failure, seismically induced landslides, expansion and settlement of soils, and other related geologic hazards for areas of new development in accordance with the Fault Rupture Hazard Overlay District adopted by the City of Lake Elsinore Zoning Code. The City may require site-specific remediation measures during permit review that may be implemented to minimize impacts in these areas.	**Consistent.** As discussed in Section 3.7, Geology and Soils, the Project site is not within a mapped State of California Earthquake Fault-Rupture Hazard Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zone Act of 1972, or a County of Riverside Fault Zone. In addition, implementation of **MM GEO-1** would ensure that the proposed Project is constructed in conformance with the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation such that proposed Project development would be safeguarded against the effects of seismic related activity that may occur on site. Therefore, no conflict with this policy would occur.
Section 3.7: Noise	
Goal 7: Maintain an environment for all City residents and visitors free of unhealthy, obtrusive, or otherwise excessive noise.	
Policy 7.1: Apply the noise standards set forth in the Lake Elsinore Noise and Land Use Compatibility Matrix (see Table 3-1) and Interior and Exterior Noise Standards (see Table 3-2) when considering all new development and redevelopment proposed within the City.	**Consistent**. As discussed in Section 3.13, Noise, the proposed Project would adhere to the noise standards set forth in the Lake Elsinore Noise and Land Use Compatibility Matrix and Interior and Exterior Noise Standards. Therefore, no conflict with this policy would occur.

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Section 3.8: Community Facilities and Protection Services	
Goal 12: Ensure that adequate electrical, natural gas and telecommunications systems are provided to meet the demand of new and existing development.	**Consistent.** As discussed in Section 3.19, Utilities and Service Systems, the Project site is located in an urbanized area of the city, adjacent to existing development, that is currently served by existing utilities, including water, sanitary sewer, storm drainage, electricity, natural gas, and telecommunications infrastructure. The proposed Project would include connections to surrounding electrical infrastructure, and operation of the Project would result in increased demand for electricity from SCE. However, the amount of electricity anticipated under Project operation is not anticipated to exceed the existing distribution capacity of the infrastructure serving the Project site, and operational activities are not expected to require new, unplanned, or physically altered electrical transmission or distribution facilities. The proposed Project would not include any new connections to natural gas infrastructure, and operation of the Project would not include natural gas usage. Telephone, cable, and internet services are located in the vicinity of the Project site and would be extended onto the Project site. The construction and expansion of these facilities would occur within the Offsite Improvements Area and Onsite Development Area during the preparation and earthwork phases and are not expected to impact any telephone, cable, or internet services off site that serve the surrounding areas. Because the proposed Project could be adequately served through the establishment of connections to existing dry utility infrastructure, no conflict with this policy would occur.
Policy 12.3: Encourage developers to incorporate energy efficient design measures into their projects and pursue available energy efficiency assistance programs from SCE and other utility agencies.	**Consistent**. As discussed in Section 3.6, Energy, the proposed Project would be consistent with all applicable standards set forth in Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as CALGreen. Therefore, no conflict with this policy would occur.
Chapter 4.0 Resource Protection and Preservation	
Section 4.2: Biological Resources	
Policy 1.4: Encourage revegetation with native plants compatible with natural surrounding habitat where soils have been disturbed during construction, and discourage plants identified in the MSHCP as unsuitable for conservation areas.	**Consistent.** As discussed in Section 2.0, Project Description, the proposed Project site landscaping would include a combination of drought-tolerant plant material, including evergreen and deciduous trees, low shrubs, and masses of groundcovers pursuant to the City's Municipal Code requirements. One of the Project Objectives is to "Maximize the use of native plant materials/species in the project landscaping, especially in areas located in proximity to preserved native habitat." The proposed Project includes a 33.65-acre Restoration Area, designated for future conservation efforts dedicated to habitat restoration. As discussed in Section 3.4, Biological Resources, the proposed Project as designed, with mitigation applied, would comply with all applicable policies and ordinances protecting biological resources, including the MSHCP. Therefore, no conflict with this policy would occur.

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
Goal 2: Protect sensitive plant and wildlife species residing or occurring within the City.	
Policy 2.1: Biological resources analyses of proposed projects shall include discussion of potential impacts to any plant or wildlife species that is officially listed as threatened or endangered by the United States Fish and Wildlife Service and/or the California Department of Fish and [Wildlife] but not covered by the MSHCP.	**Consistent**. As discussed in Section 3.4, Biological Resources, the analysis of potential impacts to special-status species includes a discussion of wildlife species that are officially listed as threatened or endangered by the United States Fish and Wildlife Service and/or the California Department of Fish and Wildlife but not covered by the MSHCP. Therefore, no conflict with this policy would occur.
Section 4.4: Water Resources	
Goal 4: Improve water quality and ensure the water supply is not degraded as a result of urbanization of the City.	
Policy 4.1: Encourage developers to provide clean water systems that reduce pollutants being discharged into the drainage system to the maximum extent feasible and meet required federal National Pollutant Discharge Elimination System (NPDES) standards.	**Consistent.** As discussed in Section 3.10, Hydrology and Water Quality, the proposed Project would implement **RCMs WQ-1** through **WQ-4,** which require compliance with applicable NPDES permits, including the Construction General Permit, the Groundwater Discharge Permit, the Riverside County MS4 Permit, and Chapter 14.08 of the City's Municipal Code. Compliance with the Construction General Permit includes the preparation of a SWPPP that specifies BMPs that will reduce pollution in stormwater discharges. Compliance with the Riverside County MS4 Permit would include preparation of a Final Water Quality Management Plan to address pollutants of concern in stormwater runoff. With compliance with these regulations, Project impacts associated with the violation of water quality standards or waste discharge requirements or the degradation of surface or groundwater water quality during Project operation would be less than significant. Therefore, no conflict with this policy would occur.
Policy 4.3: Require Best Management Practices through project conditions of approval for development to meet the Federal NPDES permit requirements.	**Consistent.** As discussed in Section 3.10, Hydrology and Water Quality, the proposed Project would implement BMPs during construction and operation of the Project in compliance with NPDES permit requirements, including the Construction General Permit and Riverside County MS4 Permit. Therefore, no conflict with this policy would occur.
Section 4.6: Cultural and Paleontological Resources	
Goal 6: Preserve, protect, and promote the cultural heritage of the City and surrounding region for the education and enjoyment of all City residents and visitors, as well as for the advancement of historical and archeological knowledge.	
Policy 6.3: When significant cultural/archeological sites or artifacts are discovered on a site, coordination with professional archeologists, relevant state and, if applicable, federal agencies, and the appropriate Native American tribes regarding preservation of sites or professional retrieval and preservation of artifacts or by other means of protection, prior to development of the site shall be required. Because ceremonial items and items of cultural patrimony reflect traditional religious beliefs and practices, developers shall waive any and all claims to ownership and agree to return all Native American ceremonial items and items of cultural patrimony that	**Consistent**. As discussed in Section 3.5, Cultural Resources, the proposed Project would be required to implement **MMs CUL-1** through **CUL-7,** which detail methods to protect any cultural, tribal cultural, or archaeological resources that may be encountered during Project construction. In addition, as discussed in Section 3.18, Tribal Cultural Resources, the Rincon Band of Luiseño Indians (Rincon), the Pechanga Band of Indians (Pechanga), and the Soboba Band of Luiseño Indians (Soboba) requested formal government-to-government consultation under AB 52. Consultation meetings were held on May 9, 2024, with the Rincon Band of Luiseño Indians, on June 24, 2024, with the Soboba Band of Luiseño Indians, and on May 8, 2024, with the Pechanga Band of Luiseño Indians. Subsequent consultation meetings were held with the

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
may be found on a project site to the appropriate tribe for treatment. It is understood by all parties that unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.	Pechanga Band of Indians on December 19, 2024, April 22, 2025, and October 14, 2025, with Soboba Band of Luiseño Indians on December 17, 2024, April 17, 2025, and October 8, 2025, and with Rincon Band of Luiseño Indians on July 23, 2025. The City concluded consultation with the Rincon Band of Luiseño Indians on July 31, 2025, the Soboba Band of Luiseño Indians on November 24, 2025, and with the Pechanga Band of Indians on November 26, 2025. The consulting tribes expressed concern that the Project area is sensitive for cultural resources and there is a possibility that previously unidentified resources might be found during ground-disturbing activities. Recommended mitigation measures and RCMs have been added to address unanticipated encounters with tribal cultural resources, including human remains. These measures are incorporated into this Draft EIR as **MMs CUL-1** through **CUL-7** (see Section 3.5.8, Cultural Resources).
Goal 7: Support state-of-the-art research designs and analytical approaches to archeological and cultural resource investigations while also acknowledging the traditional knowledge and experience of the Native American tribes regarding Native American culture.	
Policy 7.1: Consult with California Native American tribes prior to decision-making processes for the purpose of preserving cultural places located on land within the City's jurisdiction that may be affected by the proposed plan, in accordance with State or Federal requirements.	**Consistent**. As summarized in Section 3.18, Tribal Cultural Resources, the NAHC was contacted on September 14, 2023, to determine whether any sacred sites were listed in the Sacred Lands File for the Project site and general vicinity. The NAHC also provided a contact list for tribal groups or individuals who may have knowledge of cultural resources within the area. In compliance with AB 52, letters were mailed to all parties including tribes and individuals who had previously requested notifications and the opportunity for consultation on applicable projects in the city. As part of the AB 52 consultation process, and in response to Pechanga's request for notification once the Project begins the entitlement process, the City sent consultation initiation request letters to Pechanga, Soboba, Rincon, the Morongo Band of Mission Indians, the Agua Caliente Band of Cahuilla Indians, and the Torres Martinez Desert Cahuilla Indians on March 6, 2024, to inform interested tribes about the proposed Project and to request information regarding tribal cultural resources on and near the Project site. Of the tribes notified, Rincon, Pechanga, and Soboba requested formal government-to-government consultation under AB 52. Consultation meetings were held on May 9, 2024, with the Rincon Band of Luiseño Indians, on June 24, 2024, with the Soboba Band of Luiseño Indians, and on May 8, 2024, with the Pechanga Band of Luiseño Indians. Subsequent consultation meetings were held with the Pechanga Band of Indians on December 19, 2024, April 22, 2025, and October 14, 2025, with Soboba Band of Luiseño Indians on December 17, 2024, April 17, 2025, and October 8, 2025, and with Rincon Band of Luiseño Indians on July 23, 2025. The City concluded consultation with the Rincon Band of Luiseño Indians on July 31, 2025, the Soboba Band of Luiseño Indians on November 24, 2025, and with the Pechanga Band of Indians on November 26, 2025.

Table 3.11.C: General Plan Consistency Analysis

General Plan Policy or Goal	Project Consistency
	The consulting tribes expressed concern that the Project area is sensitive for cultural resources and there is a possibility that previously unidentified resources might be found during ground-disturbing activities. Recommended mitigation measures and RCMs have been added to address unanticipated encounters with tribal cultural resources, including human remains. These measures are incorporated into this Draft EIR as **MMs CUL-1** through **CUL-7** (see Section 3.5.8, Cultural Resources).
Goal 8: Preserve paleontological resources occurring within the City.	
Policy 8.1: For development in areas delineated as "High" or "Undetermined" potential sensitivity for paleontological resources, require the project applicant to hire a certified paleontologist, who must perform a literature search and/or survey and apply the relevant treatment for the site as recommended by the Society for Vertebrate Paleontology.	**Consistent.** As discussed in Section 3.7, Geology and Soils, a Paleontological Resources Assessment Report was prepared, which determined that ground-disturbing activities associated with construction of the proposed Project may impact paleontological resources. As such, the proposed Project would implement a paleontological resource impact mitigation program consistent with CEQA and the 2020 guidelines of the Society of Vertebrate Paleontology, as detailed in **MM GEO-2**, during the construction of the proposed Project to prevent impacts on significant, nonrenewable paleontological resources and/or reduce them to less than significant. Therefore, no conflict with this policy would occur.
Section 4.8: Aesthetics	
Goal 11: Provide and maintain a natural and built environment that is visually pleasing to City residents and visitors.	
Policy 11.1: For new developments and redevelopment, encourage the maintenance and incorporation of existing mature trees and other substantial vegetation on the site, whether naturally-occurring or planted, into the landscape design.	**Consistent.** The proposed Project would include on-site landscaping that would be consistent with the surrounding area and a 33.65-acre Restoration Area that would be maintained. Therefore, no conflict with this policy would occur.
Policy 11.3: Where appropriate, encourage new planting of native and/or non-invasive ornamental plants to enhance the scenic setting of public and private lands.	**Consistent.** The proposed Project would include on-site landscaping consisting of native and non-invasive ornamental plants, which would enhance the visual character of the Project site. Therefore, no conflict with this policy would occur.

Source: City of Lake Elsinore, City of Lake Elsinore General Plan (adopted December 13, 2011).

[1] Federal Emergency Management Agency. 2008. Flood Insurance Rate Map No. 06065C2028G. August 28.

AB = Assembly Bill
BMP = Best Management Practice
Cal/OSHA = California Occupational Safety and Health Administration
CALGreen = the California Green Building Standards Code
CBC = California Building Code
CERS = California Environmental Reporting System
DEH = Department of Environmental Health
EIR = Environmental Impact Report
FEMA = Federal Emergency Management Agency
FIRM = Flood Insurance Rate Map
HMBP = Hazardous Materials Business Plan
MM = Mitigation Measure
MS4 = Municipal Separate Storm Sewer System
MSHCP = Multiple Species Habitat Conservation Plan
NAHC = Native American Heritage Commission
NFPA = National Fire Protection Association
NPDES = National Pollutant Discharge Elimination System
RCM = Regulatory Compliance Measure
RCFD = Riverside County Fire Department
SCE = Southern California Edison
SWPPP = Stormwater Pollution Prevention Plan

As provided above in Table 3.11.C, the proposed Project would be consistent with the applicable goals and policies of the City of Lake Elsinore General Plan through implementation of Regulatory Compliance Measure (RCM) HAZ-1, which requires preparation of an Hazardous Materials Business Plan (HMBP) via the California Environmental Reporting System (CERS); RCM FIRE-2, which requires a fuel modification zone to be maintained on a regular basis to ensure efficacy pursuant to MM FIRE-1; MM GEO-1 to ensure conformance with the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation; RCMs WQ-1 through WQ-4, which require compliance with applicable NPDES permits, including the Construction General Permit, the Groundwater Discharge Permit, the Riverside County MS4 Permit, and Chapter 14.08 of the City's Municipal Code; MMs CUL-1 through CUL-7, which detail methods to protect any cultural, tribal cultural, or archaeological resources that may be encountered during Project construction; and MM GEO-2 to prevent impacts on significant, nonrenewable paleontological resources and/or reduce them to less than significant with mitigation incorporated.

California Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act. The California Attorney General's Bureau of Environmental Justice has compiled best practices and suggested mitigation measures to be applied to industrial and warehouse projects near sensitive receptors.[17] Although these best practices and recommended measures are not binding regulations or otherwise required, the proposed Project has been analyzed for consistency with these recommendations for informational purposes. Table 3.11.D lists guidance from the *Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act*[18] document and summarizes the proposed Project's consistency with this guidance document.

As provided in Table 3.11.D, the proposed Project would be consistent with most of the BMPs recommended by the *Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* document. In addition, several of the mitigation measures, project design features (PDFs), and RCMs prescribed in this Draft EIR correspond to the BMPs identified in the *Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* guidance, including MMs AQ-1, AQ-3, AQ-4, AQ-5, AQ-9, and AQ-10; PDFs AQ-3 through AQ-5; and RCMs N-1 and TRA-1.

Although the proposed Project would be inconsistent with select BMPs presented in Table 3.11.D above, it should be noted that these BMPs are recommendations and are not regulations or otherwise required for the Project to implement. Rather, this discussion is included for informational purposes and to demonstrate the Project Applicant's commitment to sustainable practices where applicable and feasible.

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17 In this document, "sensitive receptors" refers to residences, schools, public recreation facilities, healthcare facilities, places of worship, daycare facilities, community centers, or incarceration facilities.

18 California Department of Justice, Attorney General. 2022. *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.* September. Website: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf (accessed October 30, 2025).

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Warehouse Siting and Design Considerations	
Per California Air Resources Board (CARB) guidance, siting warehouse facilities so that their property lines are at least 1,000 feet from the property lines of the nearest sensitive receptors.	**Inconsistent**. The Project site is generally bounded by undeveloped land in all directions; however, existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area), respectively along the northwest and southeast sides of Pierce Street, and a residence is located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Baker Street. All the existing residential uses are outside the Project site limits. As such, the Project would develop warehouse uses within 1,000 feet of the property lines of the nearest sensitive receptors. LSTs are based on the ambient concentrations of that pollutant within the Project's and the distance to the nearest sensitive receptor. As discussed in Section 3.3, Air Quality, the proposed Project's construction localized emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed on-site receptors. Further, a Project-specific HRA was prepared using methodology from CARB (Appendix C-2), which determined that health risk impacts related to the exposure of sensitive receptors to substantial pollutant concentrations under construction of the proposed Project would be less than significant. Nevertheless, the proposed Project would be subject to various CARB, OEHHA, and SCAQMD policies, which would further reduce potential health risks to nearby sensitive receptors.
Providing adequate amounts of on-site parking to prevent trucks and other vehicles from parking or idling on public streets and to reduce demand for off-site truck yards.	**Consistent.** As shown in Table 3.11.B, above, the proposed Project would not provide the minimum required number of parking spaces pursuant to the M-2 zoning district. However, a parking study was approved by the City to allow for the reduction of required parking spaces. As stated in the parking study, the proposed Project would be subject to the following parking requirement: 1 parking space per 1,000 sf of floor area for the first 40,000 sf, 1 parking space for each 4,000 sf of floor area for the portion over 40,000 sf, and 1 parking space for each facility vehicle. Applying this parking requirement, the proposed Project would require approximately 310 parking spaces. As the proposed Project would include 466 vehicle parking spaces and 391 trailer parking spaces, the proposed Project would be consistent with (and exceed) the number of required parking spaces agreed upon by the City.
Establishing setbacks from the property line of the nearest sensitive receptor to warehouse dock doors, loading areas, and truck drive aisles, and locating warehouse dock doors, loading areas, and truck drive aisles on the opposite side of the building from the nearest sensitive receptors—e.g., placing dock doors on the north side of the facility if sensitive receptors are near the south side of the facility.	**Consistent**. The proposed Project would include 23 dock doors associated with Building 1, 110 dock doors associated with Building 2, loading areas, and truck drive aisles. As depicted on Figure 2-4, the proposed dock doors and truck yard would not be oriented to face the single-family residences along Pierce Street or the residence southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Baker Street.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Placing facility entry and exit points from the public street away from sensitive receptors—e.g., placing these points on the north side of the facility if sensitive receptors are adjacent to the south side of the facility.	**Consistent.** Access to Building 1 would be provided via two driveways, one from Pierce Street and the other from Baker Street. Access to Building 2 would be provided via two driveways from Baker Street. All truck access would occur along Baker Street, and only passenger vehicles would enter and exit driveways along Pierce Street. The proposed driveway on Pierce Street would be located approximately 370 feet from the single-family residence located along the southeast side of Pierce Street and 630 feet from the single-family residence located along the northwest side of Pierce Street, and the easternmost driveway on Baker Street would be located approximately 200 feet northwest of the single-family residence located along Baker Street near the northeast corner of the Onsite Development Area. However, trucks entering and exiting the easternmost driveway on Baker Street are expected to utilize Baker Street and Nichols Road to access I-15 and would not travel past the residence along Baker Street.
Ensuring heavy duty trucks abide by the on-site circulation plans by constructing physical barriers to block those trucks from using areas of the project site restricted to light duty vehicles or emergency vehicles only.	**Consistent**. As depicted on Figure 2-4, the passenger vehicle parking areas and truck parking area would be separated by gates.
Preventing truck queuing spillover onto surrounding streets by positioning entry gates after a minimum of 140 feet of space for queuing, and increasing the distance by 70 feet for every 20 loading docks beyond 50 docks.	**Consistent**. The proposed Project would include a total of 133 dock doors (loading docks). As such, the proposed Project should position entry gates after a minimum of 420 feet. As depicted on Figure 2-4, all driveways would be located more than 420 feet from the intersection of Baker Street and Nichols Road. In addition, the proposed Project would obtain approval from the City's Engineering Department of all turning templates to verify truck turning movements at entrance and exit driveways and street intersections adjacent to the warehousing buildings prior to entitlement approval.
Locating facility entry and exit points on streets of higher commercial classification that are designed to accommodate heavy duty truck usage.	**Inconsistent**. Access to Building 1 would be provided via two driveways, one from Pierce Street and the other from Baker Street. Access to Building 2 would be provided via two driveways from Baker Street. Baker Street is designated as a Collector roadway per the City's General Plan. Pierce Street does not have a roadway classification in the City's General Plan. As such, three of the four proposed driveways would be located on a street designed to accommodate truck usage. It should be noted that the Project site's existing Limited Industrial land use designation and M-1 and M-2 zoning districts are intended to facilitate development of industrial, manufacturing, or related uses on the Project site, regardless of adjacent roadway designations. In addition, the proposed Project would include ROW improvements along Pierce Street and Baker Street, including the widening of Pierce Street and Baker Street to their ultimate ROW of 60 feet and 68 feet, respectively.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Screening the warehouse site perimeter and onsite areas with significant truck traffic (e.g., dock doors and drive aisles) by creating physical, structural, and/or vegetative buffers that prevent or substantially reduce pollutant and noise dispersion from the facility to sensitive receptors.	**Consistent**. As depicted on Figure 2-4, the proposed buildings would include a landscaping setback along all sides of the Onsite Development Area. The proposed landscaping buffer would include the use of 24-inch and 36-inch box trees as feasible. In addition, screening walls would line the truck courts, featuring pilasters to add architectural interest and effectively mitigate its mass.
Planting exclusively 36-inch box evergreen trees to ensure faster maturity and four-season foliage.	**Inconsistent**. The proposed Project would include 15-gallon, 24-inch, and 36-inch box trees as feasible. As described in Section 2.0, Project Description, a combination of drought-tolerant plant material, including evergreen and deciduous trees, low shrubs, and masses of groundcovers, would be installed throughout the Project site pursuant to the City's Municipal Code requirements.
Requiring all property owners and successors in interest to maintain onsite trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.	**Consistent.** All property owners and successors would maintain on-site trees and vegetation for the duration of ownership, including replacing any dead or unhealthy trees and vegetation.
Posting signs clearly showing the designated entry and exit points from the public street for trucks and service vehicles.	**Consistent.** The proposed Project would include signs clearly identifying the designated entry and exit points from the public street for trucks and service vehicles, consistent with the standards for warehouse signage set forth by AB 98. All Project signage would be consistent with the provisions set forth in Section 17.196.200, Signs in the Industrial Districts, of the City's Municipal Code.
Including signs and drive aisle pavement markings that clearly identify onsite circulation patterns to minimize unnecessary onsite vehicle travel.	**Consistent.** The proposed Project would include signs and drive aisle pavement markings that clearly identify on-site circulation patterns to minimize unnecessary on-site vehicle travel, consistent with the standards for warehouse signage set forth by AB 98. All Project signage would be consistent with the provisions set forth in Section 17.196.200, Signs in the Industrial Districts, of the City's Municipal Code.
Posting signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets.	**Consistent.** The proposed Project would include signs indicating that all parking and maintenance of trucks must be conducted within designated on-site areas and not within the surrounding community or public streets, consistent with the standards for warehouse signage set forth by AB 98. All Project signage would be consistent with the provisions set forth in Section 17.196.200, Signs in the Industrial Districts, of the City's Municipal Code.
Air Quality and Greenhouse Gas Emissions Analysis and Mitigation	
Best Practices	
Fully analyzing all reasonably foreseeable project impacts, including cumulative impacts. In general, new warehouse developments are not ministerial under CEQA because they involve public officials' personal judgment as to the wisdom or manner of carrying out the project, even when warehouses are permitted by a site's applicable zoning and/or general plan land use designation.	**Consistent.** Project-specific Air Quality Impact Analysis[1] and HRA[2] reports were prepared and peer reviewed, which fully analyzed all reasonably foreseeable Project impacts, including cumulative impacts.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
When analyzing cumulative impacts, thoroughly considering the project's incremental impact in combination with past, present, and reasonably foreseeable future projects, even if the project's individual impacts alone do not exceed the applicable significance thresholds.	**Consistent.** Project-specific Air Quality Impact Analysis[1] and HRA[2] reports were prepared and peer reviewed, which fully analyzed all reasonably foreseeable Project impacts, including the Project's incremental impact in combination with past, present, and reasonably foreseeable future projects.
Preparing a quantitative air quality study in accordance with local air district guidelines.	**Consistent**. Project-specific Air Quality Impact Analysis[1] and HRA[2] reports were prepared and peer reviewed in accordance with local air district guidelines.
Preparing a quantitative health risk assessment in accordance with California Office of Environmental Health Hazard Assessment and local air district guidelines.	**Consistent**. Project-specific Air Quality Impact Analysis[1] and HRA[2] reports were prepared and peer reviewed in accordance with OEHHA and local air district guidelines.
Refraining from labeling compliance with CARB or air district regulations as a mitigation measure—compliance with applicable regulations is required regardless of CEQA.	**Consistent.** The proposed Project's compliance with CARB and air district regulations are not considered as mitigation measures.
Disclosing air pollution from the entire expected length of truck trips. CEQA requires full public disclosure of a project's anticipated truck trips, which entails calculating truck trip length based on likely truck trip destinations, rather than the distance from the facility to the edge of the air basin, local jurisdiction, or other truncated endpoint. All air pollution associated with the project must be considered, regardless of where those impacts occur.	**Consistent**. The Project-specific Air Quality Impact Analysis[1] and HRA[2] disclose anticipated air quality emissions from the entire expected length of truck trips.
Accounting for all reasonably foreseeable greenhouse gas emissions from the project, without discounting projected emissions based on participation in California's Cap-and-Trade Program.	**Consistent**. The Project-specific Air Quality Impact Analysis[1] and HRA[2] account for all reasonably foreseeable GHG emissions from the Project without discounting projected emissions based on participation in California's Cap-and-Trade Program.
Mitigation Measures for Construction	
Requiring off-road construction equipment to be hybrid electric-diesel or zero-emission, where available, and all diesel-fueled off-road construction equipment to be equipped with CARB Tier IV-compliant engines or better, and including this requirement in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including the use of Tier 4 Interim construction equipment.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Prohibiting off-road diesel-powered equipment from being in the "on" position for more than 10 hours per day.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would comply with Title 13, Section 2449(d)(D) of the CCR, which requires operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on road) to limit vehicle idling to 5 minutes or less, thereby encouraging operators to switch off the equipment when not directly in use.
Using electric-powered hand tools, forklifts, and pressure washers, and providing electrical hook ups to the power grid rather than use of diesel-fueled generators to supply their power.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including the use of electric-powered hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors.
Designating an area in the construction site where electric-powered construction vehicles and equipment can charge.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including the designation of an area on the construction site where electric-powered construction vehicles and equipment can charge.
Limiting the amount of daily grading disturbance area.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with SCAQMD Rule 403, which requires best available control measures to be applied to earthmoving and grading activities.
Prohibiting grading on days with an Air Quality Index forecast of greater than 100 for particulates or ozone for the project area.	**Inconsistent**. All Project construction and grading-related activities shall be consistent with applicable provisions of the City of Lake Elsinore's Good Neighbor Policy, as discussed in Table 3.11.E, with regard to construction emissions. The Project would comply with the SCAQMD regulations in effect at the time work commences, including Rule 403 (Fugitive Dust), which would require the contractor to implement measures that would reduce the amount of particulate matter generated during the construction period.
Forbidding idling of heavy equipment for more than three minutes.	**Inconsistent.** As discussed in Section 3.3, Air Quality, the proposed Project would comply with Title 13, Section 2449(d)(D) of the CCR, which requires operators of off-road vehicles (i.e., self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on road) to limit vehicle idling to 5 minutes or less, thereby encouraging operators to switch off the equipment when not directly in use. As such, the Project would comply with applicable requirements limiting idling to less than 5 minutes but would not necessarily limit idling to less than 3 minutes as provided in this recommendation.
Keeping onsite and furnishing to the lead agency or other regulators upon request, all equipment maintenance records and data sheets, including design specifications and emission control tier classifications.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including periodic on-site inspections by a City representative as well as post-construction inspections to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities. These inspections may include a review of equipment maintenance records and data sheets. Further, the proposed Project would be subject to **MM AQ-10**, which requires that facility operators that own vehicles subject to CARB regulations shall maintain

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
	records on site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and State upon request.
Conducting an on-site inspection to verify compliance with construction mitigation and to identify other opportunities to further reduce construction impacts.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including periodic on-site inspections by a City representative as well as post-construction inspections to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities.
Using paints, architectural coatings, and industrial maintenance coatings that have volatile organic compound levels of less than 10 g/L.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would comply with SCAQMD Rule 1113, which limits the volatile organic compound content of architectural coatings.
Providing information on transit and ridesharing programs and services to construction employees.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would include PDF AQ-4, which states that upon exceedance of 250 employees at the proposed warehouse facilities, a rideshare and commute trip reduction program would be established, such as IE Commuter, in accordance with SCAQMD Rule 2202, with the intent of discouraging single-occupancy vehicle trips and promoting alternate modes of transportation, such as carpooling and transit, where feasible.
Providing meal options onsite or shuttles between the facility and nearby meal destinations for construction employees.	**Consistent.** As discussed with respect to the preceding goal and in Section 3.3, Air Quality, the proposed Project would include PDF AQ-4, which states that upon exceedance of 250 employees at the proposed warehouse facilities, a rideshare and commute trip reduction program would be established, such as IE Commuter, in accordance with SCAQMD Rule 2202, with the intent of discouraging single-occupancy vehicle trips and promoting alternate modes of transportation, such as carpooling and transit, where feasible. This program could include lunchtime transportation options.
Mitigation Measures for Operation	
Requiring all heavy-duty vehicles engaged in drayage to or from the project site to be zero-emission beginning in 2030.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-9**, which includes requirements exclusively to use zero-emission light and medium-duty delivery trucks and vans when economically feasible, as well as requirements to use the cleanest technologies available and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site at such time this technology becomes commercially available. This requirement applies to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Requiring all on-site motorized operational equipment, such as forklifts and yard trucks, to be zero-emission with the necessary charging or fueling stations provided.	**Consistent.** As discussed with respect to the preceding response and in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-9**, which includes requirements to use the clean technologies and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site at such time this technology becomes commercially available. This requirement applies to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.
Requiring tenants to use zero-emission light- and medium-duty vehicles as part of business operations.	**Consistent.** As discussed with respect to the preceding responses and in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-9**, which includes requirements exclusively to use zero-emission light and medium-duty trucks and vans when economically feasible, and to provide the necessary infrastructure to support zero-emission vehicles, equipment, and appliances that would be operating on site at such time this technology becomes commercially available. This requirement applies to equipment such as forklifts, handheld landscaping equipment, yard trucks, office appliances, etc.
Forbidding trucks from idling for more than three minutes and requiring operators to turn off engines when not in use.	**Inconsistent.** As discussed in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-4**, which requires that signs be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations, such as restriction of idling to 5 minutes or less once the vehicle is stopped, setting the transmission to "neutral" or "park," and engaging the parking brake. In addition, trucks on site are required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies.
Posting both interior- and exterior-facing signs, including signs directed at all dock and delivery areas, identifying idling restrictions and contact information to report violations to CARB, the local air district, and the building manager.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-4**, which requires that signs be installed at truck access gates, loading docks, and truck parking areas that identify applicable CARB anti-idling regulations, such as restriction of idling to 5 minutes or less once the vehicle is stopped, setting the transmission to "neutral" or "park," and engaging the parking brake. The signs shall also identify the telephone numbers of the building facilities manager and CARB to report violations. In addition, trucks on site are required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies. Further, the Project would adhere to **MM AQ-9**, which would require the establishment of tenant requirements and identification of the responsible party to maintain, replace, and repair the legible, durable, weather-proof signs that were installed at initial building occupancy at truck access gates, loading docks, and truck parking areas to identify applicable CARB anti-idling regulations.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Installing solar photovoltaic systems on the project site of a specified electrical generation capacity that is equal to or greater than the building's projected energy needs, including all electrical chargers.	**Consistent.** As discussed in Section 3.8, Greenhouse Gas Emissions, per Title 24 requirements, the proposed Project would be required to incorporate solar power for the office portion of the proposed buildings. As discussed in Section 3.3, Air Quality, the Project would adhere to **MM AQ-9**, which would require the establishment of tenant requirements and identification of the responsible party to maintain, replace, upgrade, and expand rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed Project would comply with existing solar requirements per the California Energy Code in effect during permitting of the Project (at the time of construction drawing plan check submittal). In the event the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed Project would be required to meet the CCR Title 24 Energy Efficiency Standards in effect during permitting of the proposed Project.
Designing all project building roofs to accommodate the maximum future coverage of solar panels and installing the maximum solar power generation capacity feasible.	**Consistent.** As discussed with respect to the preceding response and in Section 3.3, Air Quality, the Project would adhere to **MM AQ-9**, which would require the establishment of tenant requirements and identification of the responsible party to maintain, replace, and upgrade rooftop solar panels per the manufacturer's recommendations for the life of the lease. The proposed Project would comply with existing solar requirements per the California Energy Code in effect during permitting of the Project (at the time of construction drawing plan check submittal). In the event the tenant requires additional solar capacity, this shall be addressed during the tenant improvement process. The proposed Project would be required to meet the CCR Title 24 Energy Efficiency Standards in effect during permitting of the proposed Project.
Constructing zero-emission truck charging/fueling stations proportional to the number of dock doors at the project.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including identification in site plans of a location for future electric truck charging stations and installation of a conduit to those locations.
Running conduit to designated locations for future electric truck charging stations.	**Consistent.** As discussed with respect to the preceding response and in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including identification in site plans of a location for future electric truck charging stations and installation of a conduit to those locations.
Unless the owner of the facility records a covenant on the title of the underlying property ensuring that the property cannot be used to provide refrigerated warehouse space, constructing electric plugs for electric transport refrigeration units at every dock door and requiring truck operators with transport refrigeration units to use the electric plugs when at loading docks.	**Consistent.** As discussed with respect to the preceding responses and Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including identification in site plans of a location for future electric truck charging stations and installation of a conduit to those locations, which could be used by electric transport refrigeration units.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Oversizing electrical rooms by 25 percent or providing a secondary electrical room to accommodate future expansion of electric vehicle charging capability.	**Consistent.** As discussed with respect to the preceding responses and Section 3.3, Air Quality, the Project would adhere to **MM AQ-1**, which would require the designation of an electrical room(s) and/or exterior area(s) of the site shall be designated where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric powered trucks or other vehicles. The electrical room(s) would be appropriately sized to accommodate EV charging demand associated with the proposed Project.
Constructing and maintaining electric light-duty vehicle charging stations proportional to the number of employee parking spaces (for example, requiring at least 10% of all employee parking spaces to be equipped with electric vehicle charging stations of at least Level 2 charging performance)	**Consistent.** The proposed Project would provide 34 EV parking stalls for EVs associated with Building 1 and 59 EV parking stalls for EVs associated with Building 2, for a total of 93 EV parking stalls. A total of 466 parking stalls would be provided under the proposed Project, including the 93 EV stalls. As such, EV parking stalls would account for approximately 20 percent of total parking stalls under the proposed Project.
Running conduit to an additional proportion of employee parking spaces for a future increase in the number of electric light-duty charging stations.	**Consistent.** As discussed in the preceding responses and in Section 3.3, Air Quality, the Project would adhere to **MM AQ-1**, which would require the designation of an electrical room(s) and/or exterior area(s) of the site where future electrical panels would be located for the purpose of supplying power to on-site charging facilities for electric-powered vehicles. The electrical room(s) would be appropriately sized to accommodate EV charging demand associated with the proposed Project.
Installing and maintaining, at the manufacturer's recommended maintenance intervals, air filtration systems at sensitive receptors within a certain radius of facility for the life of the project.	**Not Applicable.** The Project site is generally bounded by undeveloped land in all directions; however, existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area), respectively along the northwest and southeast sides of Pierce Street, and a nonconforming residence is located outside of and adjacent to the southeast corner of the Project site along Baker Street. LSTs are based on the ambient concentrations of that pollutant within the Project's SRA and the distance to the nearest sensitive receptor. As discussed in Section 3.3, Air Quality, the proposed Project's operational localized emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed on-site receptors. Further, a Project-specific HRA was prepared (Appendix C-2), which determined that health risk impacts related to the exposure of sensitive receptors to substantial pollutant concentrations under operation of the proposed Project would be less than significant. Nevertheless, the proposed Project would be subject to various CARB, OEHHA, and SCAQMD policies, which would further reduce potential health risks to nearby sensitive receptors. Because operational impacts to nearby sensitive receptors would be less than significant, air filtration systems at nearby sensitive receptors are not required and would not be included in the proposed Project.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Installing and maintaining, at the manufacturer's recommended maintenance intervals, an air monitoring station proximate to sensitive receptors and the facility for the life of the project, and making the resulting data publicly available in real time. While air monitoring does not mitigate the air quality or greenhouse gas impacts of a facility, it nonetheless benefits the affected community by providing information that can be used to improve air quality or avoid exposure to unhealthy air.	**Inconsistent.** As discussed with respect to the preceding response, the proposed Project's operational localized emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed receptors. Further, a Project-specific HRA was prepared (Appendix C-2), which determined that health risk impacts related to the exposure of sensitive receptors to substantial pollutant concentrations under operation of the proposed Project would be less than significant. Because operational impacts to nearby sensitive receptors would be less than significant, an air monitoring station at nearby sensitive receptors is not required and would not be included in the proposed Project. An existing air quality monitoring station, the Lake Elsinore monitoring station, is approximately 2.45 miles southeast of the Project site.
Requiring all stand-by emergency generators to be powered by a non-diesel fuel.	**Inconsistent.** As discussed in Section 3.3, Air Quality, the proposed Project was conservatively assumed to include installation of two 300-horsepower diesel-powered emergency generators at the industrial buildings and one 350-horsepower diesel-powered emergency generator at the off-site lift station.
Requiring facility operators to train managers and employees on efficient scheduling and load management to eliminate unnecessary queuing and idling of trucks.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would be subject to **MM AQ-3**, under which the developer/successor-in-interest shall provide building occupants with information related to SCAQMD's Carl Moyer Program promoting clean vehicles and information, including the benefits of reduced idling time. Further, the Project would implement **MM AQ-4,** which requires that signs be installed at truck access gates, loading docks, and truck parking areas to identify applicable CARB anti-idling regulations, such as restriction of idling to 5 minutes or less once the vehicle is stopped, setting the transmission to "neutral" or "park," and engaging the parking brake. The signs shall also identify telephone numbers of the building facilities manager and CARB to report violations.
Requiring operators to establish and promote a rideshare program that discourages single-occupancy vehicle trips and provides financial incentives for alternate modes of transportation, including carpooling, public transit, and biking.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would include PDF AQ-4, which states that upon exceedance of 250 employees at the proposed warehouse facilities, a rideshare and commute trip reduction program would be established, such as IE Commuter, in accordance with SCAQMD Rule 2202, with the intent of discouraging single-occupancy vehicle trips and promoting alternate modes of transportation, such as carpooling and transit, where feasible.
Meeting CalGreen Tier 2 green building standards, including all provisions related to designated parking for clean air vehicles, electric vehicle charging, and bicycle parking.	**Consistent.** As discussed in Section 3.6, Energy, the proposed Project would be consistent with all applicable standards set forth in Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as CALGreen.
Designing to LEED green building certification standards.	**Consistent.** As discussed in Section 3.8, Greenhouse Gas Emissions, the proposed Project would adhere to Building Energy Efficiency Standards, as codified in Part 6 of Title 24 of the CCR, known as the Energy Code. The Energy Code would regulate energy consumed for heating, cooling, ventilation, water heating, and lighting under operation of the proposed Project. Further, the proposed Project would incorporate all applicable requirements of

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
	CALGreen, including the provision of bicycle parking, EV charging, shade trees, water-conserving plumbing fixtures and fittings, outdoor water, construction waste management, and recycling by occupants. These PDFs contribute towards LEED Green Building certification.
Providing meal options onsite or shuttles between the facility and nearby meal destinations.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would include PDF AQ-4, which states that upon exceedance of 250 employees at the proposed warehouse facilities, a rideshare and commute trip reduction program would be established, such as IE Commuter, in accordance with SCAQMD Rule 2202, with the intent of discouraging single-occupancy vehicle trips and promoting alternate modes of transportation, such as carpooling and transit, where feasible. This program could include lunchtime transportation options.
Posting signs at every truck exit driveway providing directional information to the truck route.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would be subject to **MM AQ-4**, which requires that the Project plans and specifications shall include signs at every truck exit driveway providing directional information to the truck route.
Improving and maintaining vegetation and tree canopy for residents in and around the project area.	**Consistent**. As discussed in Section 3.3, Air Quality, **PDF AQ-3** would ensure that the Project site is densely screened with landscaping along all bordering streets and site boundaries, with trees spaced no further apart than 25 feet on center as feasible. Facility operators would be responsible for establishing a long-term maintenance mechanism to ensure that the landscaping remains in place and functional in accordance with the approved landscaping plan.
Requiring that every tenant train its staff in charge of keeping vehicle records in diesel technologies and compliance with CARB regulations, by attending CARB-approved courses. Also require facility operators to maintain records on-site demonstrating compliance and make records available for inspection by the local jurisdiction, air district, and state upon request.	**Consistent.** As discussed in Section 3.3, Air Quality, the Project would comply with applicable standards as prescribed in the City of Lake Elsinore's Good Neighbor Policy, including periodic on-site inspections by a City representative and after construction to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities. These inspections may include a review of equipment maintenance records and data sheets. Further, the proposed Project would be subject to **MM AQ-10**, which requires that facility operators that own vehicles subject to CARB regulations shall maintain records on-site demonstrating compliance with this requirement and shall make records available for inspection by the local jurisdiction, air district, and State upon request.
Requiring tenants to enroll in the United States Environmental Protection Agency's SmartWay program, and requiring tenants who own, operate, or hire trucking carriers with more than 100 trucks to use carriers that are SmartWay carriers.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-3**, under which site tenants would be notified about the availability of the SmartWay program, among other programs. In addition, trucks on site are required to comply with CARB's Heavy-Duty (Tractor-Trailer) GHG Regulation, which requires SmartWay tractor trailers that include idle-reduction technologies, aerodynamic technologies, and low-rolling resistant tires that would reduce fuel consumption and associated emissions.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Providing tenants with information on incentive programs, such as the Carl Moyer Program and Voucher Incentive Program, to upgrade their fleets.	**Consistent.** As discussed in Section 3.3, Air Quality, the proposed Project would adhere to **MM AQ-3**, which would require the developer/successor-in-interest to provide building occupants with information related to SCAQMD's Carl Moyer Program, or other such programs that promote truck retrofits or "clean" vehicles and information including, but not limited to, the health effect of diesel particulates, benefits of reduced idling time, and CARB regulations. Tenants shall be notified about the availability of: (1) alternatively fueled cargo handling equipment; (2) grant programs for diesel-fueled vehicle engine retrofit and/or replacement; (3) access to alternative fueling stations proximate to the site that supply compressed natural gas; and 5) the USEPA's SmartWay program. Further, pursuant to **MM AQ-9**, the tenant lease agreement for the site would include information about funding opportunities, such as the Carl Moyer program, that provide incentives for using cleaner-than-required engines and equipment.
Noise Impacts Analysis and Mitigation	
Best Practices	
Preparing a noise impact analysis that considers all reasonably foreseeable project noise impacts, including to nearby sensitive receptors. All reasonably foreseeable project noise impacts encompasses noise from both construction and operations, including stationary, on-site, and off-site noise sources.	**Consistent.** A Project-specific Noise and Vibration Analysis[3] was completed for the proposed Project that considers all reasonably foreseeable Project noise impacts from both construction and operations, including stationary, on-site, and off-site noise sources and impacts to nearby sensitive receptors.
Adopting a lower significance threshold for incremental noise increases when baseline noise already exceeds total noise significance thresholds, to account for the cumulative impact of additional noise and the fact that, as noise moves up the decibel scale, each decibel increase is a progressively greater increase in sound pressure than the last. For example, 70 dBA is ten times more sound pressure than 60 dBA.	**Consistent.** As discussed in Section 3.13, Noise, the approach used in the Project-specific Noise and Vibration Analysis[3] recognizes that potential noise impacts can depend on ambient noise levels in the Project site vicinity. If the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for the Project analysis, a readily perceptible 5 dBA or greater Project-related noise level increase was considered a potentially significant impact on a case-by-case basis when the without-Project noise levels are below 60 dBA. Per the Federal Interagency Committee on Noise, in areas where the without-Project noise levels range from 60 to 65 dBA, an increase of 3 dBA or less is considered a barely perceptible noise level increase for most people and is not considered potentially significant. When the without-Project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA or greater is considered a potentially significant impact if the noise criteria for a given land use are exceeded, since it likely contributes to an existing noise exposure exceedance.
Disclosing and considering the significance of short-term noise levels associated with all aspects of project operation (i.e. both on-site noise generation and off-site truck noise). Considering only average noise levels may mask noise impacts sensitive receptors would	**Consistent.** A Project-specific Noise and Vibration Analysis[3] was completed for the proposed Project, which discloses and considers the significance of short-term noise levels associated with all aspects of Project operation (i.e., both on-site noise generation and off-site truck noise).

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
consider significant—for example, the repeated but short-lived passing of individual trucks or loading activities at night.	
Mitigation Measures	
Constructing physical, structural, or vegetative noise barriers on and/or off the project site.	**Consistent.** As discussed in Section 3.13, Noise, with implementation of **RCM N-1,** noise and vibration levels generated from Project construction activities and operations of the Project would remain less than significant, and mitigation is not required. Nevertheless, the Project's design already includes a 24-foot landscaping setback along Baker Street. In addition, Building 2 would include a 14-foot-high screen wall lining the truck court with 16-foot-high pilasters to screen the site.
Planning and enforcing truck routes that avoid passing sensitive receptors.	**Consistent.** As discussed in Section 3.13, Noise, because there are no noise-sensitive uses along Nichols Road between I-15 and Terra Cotta Road, which is where a majority of truck trips would happen due to the regional connections provided by I-15, noise generated by Project-related traffic, including trucks, would result in a less than significant impact with respect to sensitive receptors.
Locating or parking all stationary construction equipment as far from sensitive receptors as possible, and directing emitted noise away from sensitive receptors.	**Not Applicable.** As discussed in Section 3.13, Noise, noise generated by stationary construction equipment would not exceed the Caltrans substantial noise increase threshold of 12 dBA during Project mobile and stationary construction activities. Therefore, temporary ambient noise level increases from Project mobile and stationary construction activities would be less than significant at all receiver locations, and relocation of equipment is not necessary.
Verifying that construction equipment has properly operating and maintained mufflers.	**Consistent.** As discussed in Section 3.13, Noise, construction of the proposed Project would comply with applicable provisions of the City's Noise Ordinance (Chapter 17.176 of the City's Municipal Code) pursuant to **RCM N-1.** As described in **RCM N-1**, the construction contractor shall ensure all mobile or stationary internal combustion engine-powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order.
Requiring all combustion-powered construction equipment to be surrounded by a noise protection barrier.	**Not Applicable.** As discussed in Section 3.13, Noise, construction of the proposed Project would comply with applicable provisions of the City's Noise Ordinance (Chapter 17.176 of the City's Municipal Code) pursuant to **RCM N-1**. As described in **RCM N-1**, the construction contractor shall ensure all mobile or stationary internal combustion engine-powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order. With adherence to **RCM N-1**, the establishment of a noise protection barrier around combustion-powered construction equipment would not be necessary.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Limiting operation hours to daytime hours on weekdays.	**Consistent.** As discussed in Section 3.13, Noise, construction of the proposed Project would comply with applicable provisions of the City's Noise Ordinance (Chapter 17.176 of the City's Municipal Code) pursuant to **RCM N-1**. As such, construction activities would be limited to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays, and the construction contractor shall obtain prior authorization from the City for any nighttime concrete pouring activities.
Paving roads where truck traffic is anticipated with low noise asphalt.	**Not Applicable.** As discussed in Section 3.13, Noise, because there are no noise-sensitive uses along Nichols Road between I-15 and Terra Cotta Road, which is where a majority of truck trips would happen due to the regional connections provided by I-15, noise generated by Project-related traffic, including trucks, would result in a less than significant impact with respect to sensitive receptors. Therefore, special paving considerations for mitigation purposes are not required.
Orienting any public address systems onsite away from sensitive receptors and setting system volume at a level not readily audible past the property line.	**Consistent.** Noise from PA systems would be considered an operational noise source. As discussed in Section 3.13, Noise, the operational source noise levels generated under the proposed Project and Project-related noise level increases that would be experienced at each of the sensitive receiver locations were determined to not exceed the City's exterior daytime and nighttime stationary noise standards, and impacts were determined to be less than significant.
Traffic Impacts Analysis and Mitigation	
Mitigation Measures	
Designing, clearly marking, and enforcing truck routes that keep trucks out of residential neighborhoods and away from other sensitive receptors.	**Consistent.** Trucks associated with operation of the proposed Project would travel to the Project site via I-15, utilizing the on-/off-ramps at Nichols Road to minimize driving spent on local roadways. This truck route would ensure no trucks are driving through residential neighborhoods and are kept from other sensitive receptors. Further, as described in PDF AQ-5 (Section 3.3, Air Quality), signs would be posted that all parking of trucks must be within designated on-site areas and not within the surrounding community or public streets.
Installing signs in residential areas noting that truck and employee parking is prohibited.	**Consistent.** The Project site is surrounded by undeveloped land and is not located within a residential area. However, as described in PDF AQ-5 (Section 3.3, Air Quality), signs will be posted that all parking of trucks must be within designated on-site areas and not within the surrounding community or public streets.
Requiring preparation and approval of a truck routing plan describing the facility's hours of operation, types of items to be stored, and truck routing to and from the facility to designated truck routes that avoids passing sensitive receptors. The plan should include measures for preventing truck queuing, circling, stopping, and parking on public streets, such as signage, pavement markings, and queuing analysis and enforcement. The plan should hold facility operators responsible	**Consistent.** The proposed Project includes the preparation and approval of a truck routing plan that meets these requirements. As discussed above, trucks associated with operation of the proposed Project would travel to the Project site via I-15, utilizing the on-/off-ramps at Nichols Road to minimize driving on local roadways. The proposed Project would be consistent with the standards for warehouse signage set forth by AB 98. As described in PDF AQ-5, signs would be posted stating that that all parking of trucks must be within designated on-site areas and not within the surrounding community or public streets. All Project signage

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
for violations of the truck routing plan, and a revised plan should be required from any new tenant that occupies the property before a business license is issued. The approving agency should retain discretion to determine if changes to the plan are necessary, including any additional measures to alleviate truck routing and parking issues that may arise during the life of the facility.	would be consistent with the provisions set forth in Section 17.196.200, Signs in the Industrial Districts, of the City's Municipal Code.
Constructing new or improved transit stops, sidewalks, bicycle lanes, and crosswalks, with special attention to ensuring safe routes to schools.	**Consistent.** As described in Section 3.9, Hazards and Hazardous Materials, the nearest school to the Project site is Alberhill Elementary School at 4170 Brianna Circle, which is approximately 0.4 mile northwest of the Project site. As discussed above, trucks associated with operation of the proposed Project would travel to the Project site via I-15 (northeast of the Project site), utilizing the on-/off-ramps at Nichols Road to minimize driving on local roadways. As such, there are no schools located on the main truck route serving the Project. The proposed Project includes ROW improvements along Pierce Street and Baker Street. The existing Pierce Street ROW varies in width along the Project's frontage. The ultimate ROW for Pierce Street is 60 feet, and the ultimate street section would include a 6-inch curb, standard gutter, 6-foot-wide sidewalk within an overall 10-foot parkway, and 20 feet of pavement from centerline to lip-of-gutter on each side of the street. Pierce Street would also be improved southwest of the Project frontage to connect to Hoff Avenue, creating a second means of emergency access. This section would be paved within the existing ROW, creating a 24-foot-wide roadway. Baker Street is currently an unimproved dirt road with a 60-foot-wide ROW. The proposed Project would dedicate an additional 4 feet of ROW on each side of Baker Street to meet the ultimate 68-foot-wide ROW required by the City's Collector roadway designation, and the ultimate roadway section would include a 6-inch curb, a standard gutter, a 6-foot-wide sidewalk within an overall 10-foot parkway, and 24 feet of pavement from centerline to lip-of-gutter on each side of the street. Baker Street would also be elevated an average of 5 feet above its existing elevation to support drainage conveyance and flood protection of ROW and would be extended to connect to Nichols Road. These roadway improvements, including pedestrian improvements, would enhance safety along the roadways that would serve the Project.
Consulting with the local public transit agency and securing increased public transit service to the project area.	**Not Applicable.** As detailed in Section 3.17, Transportation, the proposed Project would not conflict with or impede the improvement of local transit facilities, and increased service to the Project site would not be required.
Designating areas for employee pickup and drop-off.	**Consistent.** The proposed Project would designate areas for employee pickup and drop-off.
Implementing traffic control and safety measures, such as speed bumps, speed limits, or new traffic signs or signals.	**Consistent.** The proposed Project would include traffic control and safety measures for the internal circulation system and new intersections. No new traffic signals are required.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Placing facility entry and exit points on major streets that do not have adjacent sensitive receptors.	**Consistent.** The proposed Project would include four driveways that would provide access to the two warehouses. These driveways would not be adjacent to sensitive receptors.
Restricting the turns trucks can make entering and exiting the facility to route trucks away from sensitive receptors.	**Consistent.** The proposed Project includes the preparation and approval of a truck routing plan, which would ensure trucks are routed to I-15 via Nichols Road, away from sensitive receptors. The proposed Project would be consistent with the standards for warehouse signage set forth by AB 98. All Project signage would be consistent with the provisions set forth in Section 17.196.200, Signs in the Industrial Districts, of the City's Municipal Code.
Constructing roadway improvements to improve traffic flow.	**Consistent.** The proposed Project includes ROW improvements on Baker Street and Pierce Street and the realignment of Baker Street to Nichols Road to improve traffic flow to and from the Project site.
Preparing a construction traffic control plan prior to grading, detailing the locations of equipment staging areas, material stockpiles, proposed road closures, and hours of construction operations, and designing the plan to minimize impacts to roads frequented by passenger cars, pedestrians, bicyclists, and other non-truck traffic.	**Consistent.** As described in Section 3.17, Transportation, the construction contractor would be required to prepare and implement a TMP (RCM TRA-1), to be reviewed and approved by City staff. The TMP would be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook* and would include provisions to maintain traffic flow along Pierce Street, Baker Street, and Nichols Road; safe access into and out of the Project site; and emergency access to the Project site and adjacent areas during construction. As such, the proposed Project would prepare a construction traffic control plan prior to grading that meets these requirements.
Other Significant Environmental Impacts Analysis and Mitigation	
Best Practices and Mitigation Measures	
Appointing a compliance officer who is responsible for implementing all mitigation measures, and providing contact information for the compliance officer to the lead agency, to be updated annually.	**Consistent.** The proposed Project would require mitigation measures to reduce potential impacts related to aesthetics; air quality; biological, cultural, tribal cultural, and paleontological resources; geology and soils; GHG emissions; hazards and hazardous materials; and wildfire. These mitigation measures would be detailed in an MMRP, and if the City were to approve the Project EIR, it would certify the MMRP in conjunction with approval of the EIR. During construction of the proposed Project, the construction contractor would be required to ensure all construction-period mitigation measures are implemented and provide evidence to the City of implementation of the measures. During operation of the proposed Project, the Project Applicant or tenant would be required to ensure all operation-period mitigation measures are implemented and provide evidence to the City of implementation of the measures. In accordance with Mitigation Measure AQ-5, a compliance officer would be appointed to ensure all Project-specific mitigation measures are implemented.
Creating a fund to mitigate impacts on affected residents, schools, places of worship, and other community institutions by retrofitting their property. For example, retaining a contractor to retrofit/install	**Not Applicable.** As discussed in Section 3.3, Air Quality, the proposed Project's construction and operational localized emissions would not exceed SCAQMD's localized significance thresholds at the maximally exposed on-site receptors. Further, a Project-specific HRA was prepared (Appendix C-2), which determined that health risk impacts related to the exposure

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
HVAC and/or air filtration systems, doors, dual-paned windows, and sound- and vibration-deadening insulation and curtains.	of sensitive receptors to substantial pollutant concentrations under construction and operation of the proposed Project would be less than significant. Further, as discussed in Section 3.13, Noise, with implementation of **RCM N-1**, noise and vibration levels generated from Project construction activities and operations would remain less than significant and would not result in substantial adverse effects to sensitive receptors. Because construction and operational air quality and noise impacts to nearby sensitive receptors would be less than significant, no mitigation is required, including the creation of a fund.
Sweeping surrounding streets on a daily basis during construction to remove any construction-related debris and dirt.	**Consistent.** During construction of the proposed Project, the surrounding streets would be swept daily to remove construction-related debris. Further, as discussed in Section 3.3, Air Quality, the Project would comply with SCAQMD Rule 403, which requires best available control measures to be applied to earthmoving and grading activities.
Directing all lighting at the facility into the interior of the site.	**Consistent.** As described in Section 3.1, Aesthetics, light fixtures would be shielded so as not to spill light onto neighboring properties, consistent with Section 117.112.040, Lighting, of the City's Municipal Code.
Using full cut-off light shields and/or anti-glare lighting.	**Consistent.** As described in Section 3.1, Aesthetics, proposed light fixtures would be shielded so as to not spill light onto neighboring properties, consistent with Section 117.112.040, Lighting, of the City's Municipal Code.
Requiring submission of a property maintenance program for agency review and approval providing for the regular maintenance of all building structures, landscaping, and paved surfaces.	**Consistent.** The proposed Project would be constructed and maintained consistent with the City's development standards and performance guidelines for industrial/warehouse uses within the Limited Industrial General Plan Land Use designation and M-2 zoning district.
Using cool pavement to reduce heat island effects.	**Inconsistent.** The Project would not necessarily incorporate this practice, as the City's development standards and performance guidelines for industrial/warehouse uses within the Limited Industrial General Plan land use designation and M-2 zoning district do not require the use of cool pavement. Nevertheless, as described in Section 2.0, Project Description, the Project would include landscaping such as accent trees, shrubs, and groundcover adjacent to hardscaped areas, the shade from which could contribute to cooler pavement.
Planting trees in parking areas to provide at least 35% shade cover of parking areas within fifteen years to reduce heat island impacts.	**Inconsistent.** The Project would not necessarily incorporate this practice, as the City's development standards and performance guidelines for industrial/warehouse uses within the Limited Industrial General Plan land use designation and M-2 zoning district do not require 35% shade cover of parking areas within 15 years to reduce heat island impacts. Nevertheless, as described in Section 2.0, Project Description, the Project would include landscaping such as accent trees, shrubs, and groundcover adjacent to hardscaped areas, the shade from which could contribute to cooler pavement.

Table 3.11.D: Attorney General's Best Practices and Mitigation Measures Consistency Analysis

Best Practice or Mitigation Measure	Project Consistency
Using light colored roofing materials with a solar reflective index of 78 or greater.	**Inconsistent**. The Project would not necessarily incorporate this practice, as the City's development standards and performance guidelines for industrial/warehouse uses within the Limited Industrial General Plan land use designation and M-2 zoning district do not require the use of light-colored roofing materials with a solar reflective index of 78 or greater. However, it should be noted that the proposed building exteriors would consist of painted concrete in shades of cream and grey, and would contain green reflective-glazed windows dispersed along the building façade within cutouts of the concrete exterior.
Including on-site amenities, such as a truck operator lounge with restrooms, vending machines, and air conditioning, to reduce the need for truck operators to idle or travel offsite.	**Consistent.** Although specific amenities, such as a truck operator lounge with restrooms and vending machines, would be determined during the construction drawing phase of the proposed Project, the proposed Project would likely include a break area for truck operators to reduce the need for truck idling. In addition, the proposed Project would include a climate control and air filtration system.
Designing skylights to provide natural light to interior worker areas.	**Not Applicable.** This measure would not be applicable, as the City of Lake Elsinore's development standards and performance guidelines for industrial/warehouse uses within the Limited Industrial General Plan land use designation and M-2 zoning district do not require skylights.
Installing climate control and air filtration in the warehouse facility to promote worker well-being.	**Consistent.** The proposed warehouse facilities would include climate control and air filtration.

Source: California Department of Justice, Attorney General. *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* (September 2022).

[1] Urban Crossroads. 2025. *Baker Lake Elsinore Air Quality Impact Analysis.* June 3.

[2] Urban Crossroads. 2025. *Baker Lake Elsinore Construction and Operational Health Risk Assessment.* June 3,.

[3] Urban Crossroads. 2024. *Baker Lake Elsinore, Noise and Vibration Analysis,* City of Lake Elsinore. July 10.

AB = Assembly Bill
CALGreen = California Green Building Standards Code
Caltrans = California Department of Transportation
CARB = California Air Resources Board
CCR = California Code of Regulations
dBA = A-weighted decibel(s)
EV = electric vehicle
GHG = greenhouse gas
HRA = Health Risk Assessment
I- = Interstate
LEED = Leadership in Energy and Environmental Design
LST = localized significance threshold
MMRP = Mitigation Monitoring and Reporting Program
OEHHA = Office of Environmental Health Hazard Assessment
PDF = Project Design Feature
ROW = right-of-way
SCAQMD = South Coast Air Quality Management District
sf = square foot/feet
SRA = Source Receptor Area
TMP = Transportation Management Plan
USEPA = United States Environmental Protection Agency

City of Lake Elsinore Good Neighbor Policy. As described above, the City of Lake Elsinore's Good Neighbor Policy applies to buildings over 250,000 square feet. Building 1 would be 212,028 square feet; therefore, the Good Neighbor Policy would not apply to Building 1. Nevertheless, Building 1 has been designed in a manner consistent with Good Neighbor Policy standards as feasible, though a detailed analysis is not required and therefore is not provided in this section.

As Building 2 would be 788,423 square feet, Building 2 would be required to comply with applicable portions of the Good Neighbor Policy. Table 3.11.E compares the proposed Project to the applicable standards prescribed in the City of Lake Elsinore's Good Neighbor Policy. The analysis presented in Table 3.11.E is based on the *Baker Street, Warehouse Project (PA-2020-103) Good Neighbor Policy Consistency Memorandum*.[19]

As provided above in Table 3.11.E, the proposed Project would generally be consistent with the applicable standards of the City's "Good Neighbor Policy" through implementation of MM AQ-1 and RCM N-1.

SCAG Connect SoCal 2024 RTP/SCS. SCAG's 2024 RTP/SCS provides performance measures and objectives to achieve the goals of improving public and private regional transportation and making communities and the region more sustainable. The proposed Project would provide additional local employment opportunities for city residents and adjacent areas within the county, reducing regional commuter traffic. Further, the proposed Project would pay fair-share payments into existing fee programs for off-site regional transportation improvements pursuant to Chapter 16.74 of the City's Municipal Code. The Project site's proximity to I-15 northeast of the Project site would provide for efficient truck and employee trips to and from the Onsite Development Area without passing through the residential community located southwest of the Project site. Further, by providing additional employment opportunities for the residents of Lake Elsinore, the proposed Project would reduce regional commuter traffic from residents traveling out of the city to employment elsewhere in the region and would be consistent with the goals of improving the jobs-housing balance in the area, as detailed in Section 3.14, Population and Housing.

As discussed in Section 3.17, Transportation, of this EIR, the proposed Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Further, and as discussed in Section 3.17, the proposed Project qualifies for the low-VMT-area screening and can be assumed to have a less than significant impact with respect to VMT. Therefore, the proposed Project would not conflict with or be inconsistent with *CEQA Guidelines* Section 15064.3(b). Additional analysis regarding potential local and regional vehicle miles traveled impacts can be found in Section 3.17.

[19] Riverside Legacy IV Nichols Road, LLC. 2024. *Baker Street, Watehouse Project (PA-2020-103) Good Neighbor Policy Consistency Memo*. September 19 (Appendix K).

Table 3.11.E: "Good Neighbor Policy" Consistency Analysis

Standard	Project Consistency
Siting and Design	
Warehousing, logistics, and distribution land uses with buildings that are 250,000 square feet in size or larger that are located within 1,000 feet of an existing or planned sensitive receptor shall provide detailed justification supporting a proposed separation of less than 1,000 feet as measured from the property line of the sensitive receptor to the nearest point of any proposed warehousing, logistics and distribution building. In no case shall the minimum setback from an existing sensitive receptor to truck bays, loading docks, active truck operations areas, outdoor storage areas, or any buildings be less than 300 feet to any property line of a sensitive receptor. Other setbacks appropriate to the site's zoning classification shall be incorporated in the design. Projects with buildings located within 1,000 feet of a sensitive receptor may submit a Preliminary Application (PAR) for review by the City Council Executive Project Review Subcommittee and the City's Development Review Committee (DRC). The PAR review may include, but not limited to, identification of site-specific conditions, list of permitted uses within the setback area, and other relevant factors used for a proposed separation of less than 1,000 feet.	**Consistent**. The Project site is generally bounded by undeveloped land in all directions; however, existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area), respectively along the northwest and southeast sides of Pierce Street, and a nonconforming residence is located outside of and adjacent to the southeast corner of the Project site along Baker Street. Building 2 would be within 1,000 feet of the nonconforming residence located along Baker Street near the northeast corner of the Onsite Development Area and the single-family residence located southwest of the Project site along the southeast side of Pierce Street. It should be noted that the other single-family residence along the northwest side of Pierce Street is not within 1,000 feet of Building 2 and therefore is not subject to the City's Good Neighbor Policy. The nonconforming residence located along Baker Street near the northeast corner of the Onsite Development Area is on a parcel designed as Light Industrial (LI) in the City's General Plan and zoned General Manufacturing (M-2). As detailed in the Good Neighbor Policy, sensitive uses "located in Industrial zoning designations" are excluded from the "Good Neighbor Policy."[1] The single-family residence located along the southeast side of Pierce Street has a General Plan designation of Low-Medium Residential (LMD) and is located in the Single-Family Residential (R1) district, which would typically make the residence a sensitive use under the Good Neighbor Policy. However, as stated in the Good Neighbor Policy Consistency Memo (Appendix K), the property containing this residence is currently vacant and is being marketed for redevelopment as nonresidential land uses. Further, the residence is unpermitted based on City records and therefore is considered an illegal conforming use. Considering the characteristics of the property, no conflict with this standard would occur.[2] Additionally, the Building 2 truck court would face the opposite direction from the residence along the southeast side of Pierce Street, and ancillary truck parking would be located within 300 feet of the residence. Activity in this parking area would be limited to parking, which would be subject to applicable CARB anti-idling regulations. Further, as described in Section 3.3, Air Quality, operational localized emissions of the Project would not exceed SCAQMD's localized significance thresholds at the maximally exposed receptors, including nearby residences. Operational emissions were also found to not expose these nearby

Table 3.11.E: "Good Neighbor Policy" Consistency Analysis

Standard	Project Consistency
	existing residential receptors to substantial pollutant concentrations resulting in health risks.
Warehousing, logistics and distribution land uses shall be designed to provide adequate on-site parking for commercial trucks and passenger vehicles and shall provide for adequate on-site queuing for trucks that is located away from sensitive receptors. The general queuing and spill-over of trucks onto surrounding public streets shall be prevented. Commercial trucks shall not be parked in the public right-of-way or nearby residential areas.	**Consistent.** As previously described in this section, a Parking Demand Analysis was approved by the City to allow for the reduction of required parking spaces. As stated in the parking study, the proposed Project would be subject to the following parking requirement: one parking space per 1,000 sf of floor area for the first 40,000 sf, one parking space for each 4,000 sf of floor area for the portion over 40,000 sf, and one parking space for each facility vehicle. Applying this parking requirement, the proposed Project would require approximately 310 parking spaces. As the proposed Project would include 466 vehicle parking spaces and 391 trailer parking spaces, the proposed Project would be consistent with the number of required parking spaces agreed upon by the City. The proposed Project includes the preparation and approval of a truck routing plan that meets applicable requirements to prevent truck queuing. Further, the proposed Project would position entry gates at the minimum spacing necessary (after 420 feet) to prevent truck queuing spillover onto surrounding streets. As depicted on Figure 2-4, all driveways would be more than 420 feet from the intersection of Baker Street and Nichols Road. In addition, the proposed Project would obtain approval from the City's Engineering Department of all turning templates to verify truck turning movements at entrance and exit driveways and street intersections adjacent to the warehousing buildings prior to entitlement approval. Therefore, no conflict with this standard would occur.
Entry gates into loading dock(s)/truck court area(s) shall be positioned at a minimum of 140 feet inside the property line. The stacking distance shall be increased by 70 feet for every 20 loading docks beyond 40 docks. The distance requirement may be reduced if the project design includes double truck stacking lanes. Queuing, or circling of vehicles, on public streets immediately pre- or post-entry to a warehousing, logistics and distribution facility is strictly prohibited. Applicants shall submit to the Engineering Department, and obtain approval of, all turning templates to verify truck turning movements at entrance and exit driveways and street intersections adjacent to said warehousing, logistics and distribution buildings prior to entitlement approval.	**Consistent**. Building 2 would include two driveways, each equipped with three lanes positioned to facilitate off-street queuing to and from the docks/truck court areas. Two lanes would be designed for ingress, while one lane would be designed for egress. The proposed design includes a total of 110 loading docks. One of the ingress driveways would be situated approximately 676 feet from the property line, while the other would be positioned approximately 483 feet from the property line. In addition, the proposed Project would obtain approval from the City's Engineering Department of all turning templates to verify truck turning movements at entrance and exit driveways and street intersections adjacent to the warehousing buildings prior to entitlement approval. Therefore, no conflict with this standard would occur.

Table 3.11.E: "Good Neighbor Policy" Consistency Analysis

Standard	Project Consistency
Sites shall be fully screened with perimeter landscaping and masonry screening walls along all bordering streets and adjacent to the property lines of sensitive receptors. Perimeter screening shall measure a minimum of 15 feet in width and shall include, but not be limited to, a continuous vegetative screen of overstory trees that measure a minimum of 25 feet in height within ten (10) years of planting and a solid masonry wall of at least six (6) feet in height. Trees shall be provided at a ratio of one (1) 24" box tree per 20 linear feet. Plans for the perimeter landscape buffer shall be prepared by a landscape architect licensed to do business in the State of California and shall incorporate adequate access points for routine maintenance and meet the City's Water Efficient Landscape Requirements (LEMC Chapter 19.08). Developments located within a Very High Fire Hazard Severity Zone shall prepare a Fuel Modification Plan that includes, but not limited to, fire-resistive, native plant species in landscaping. Landscape plans in for developments located in a Very High Fire Hazard Severity Zone shall be reviewed by the City Fire Marshal. The property owner will be responsible to establish a long-term maintenance mechanism to assure that the landscaping remains in place and functional in accordance with the approved landscaping plan and shall be responsible to ensure that the landscaping is maintained in a healthy, living condition, to include the replacement of dead, diseased, or dying plant materials as soon as practicable.	**Consistent**. As depicted on Figure 2-4, Building 2 would include a 24-foot landscaping setback along Baker Street. The proposed landscaping buffer would meet the requirements detailed in this standard, including the use of 24 box trees as feasible. In addition, Building 2 would include a 14-foot-high screen wall lining the truck court with 16-foot-high pilasters to screen the site. In addition, as the Project site is located within a Very High Fire Hazard Severity Zone, a Fuel Modification Plan has been prepared that includes, but is not limited to, fire-resistive, native plant species in landscaping and a requirement that the proposed landscape plans be reviewed by the City Fire Marshal. Therefore, no conflict with this standard would occur.
Building planes visible from public view shall be articulated by changes in exterior building materials, color, decorative accents, and/or articulated features. Modulation and variation of building masses between adjacent buildings visible from public streets shall be provided. Pedestrian and ground-level building entries accessible to visitors should be designed using recessed entries, covered entries, projections, or roofs to provide shade and visual relief at a pedestrian scale.	**Consistent**. As described in Section 3.1, Aesthetics, public views of the proposed buildings from Baker Street, Pierce Street, and Nichols Road would be generally screened through on-site landscaping; however, any view of proposed building planes visible from these public streets would be articulated by changes in exterior building materials and color. The building façades would feature a range of light and medium shades of beige and brown, complemented by stone accents to break up their visual mass. Reflecting the natural palette, the windows would incorporate light tinted reflective glazing. Pedestrians would primarily encounter on-site vegetation followed by screen walls, which would echo the building's color palette and offer visual interest through stone pilasters. In addition, office entries, distinguished by stone siding, recessed glass doors, and metal canopies, would guide visitors and employees, ensuring consistency with the overall design standard. Therefore, no conflict with this standard would occur.

Table 3.11.E: "Good Neighbor Policy" Consistency Analysis

Standard	Project Consistency
Construction and Operation	
All construction and grading related activities shall comply with the South Coast Air Quality Management District (SCAQMD) Regulations in effect at the time work commences.	**Consistent**. As discussed in Section 3.3, Air Quality, the proposed Project would comply with applicable SCAQMD regulations during construction and grading activities. Therefore, no conflict with this standard would occur.
The following environmentally responsible practices shall be required during construction: a. The applicant shall use reasonable best efforts, as determined by the Community Development Director, or designee, to deploy the highest rated California Air Resources Board (CARB) Tier technology that is available at the time of construction. Prior to permit issuance, the construction contractor shall submit an equipment list confirming equipment used is compliant with the highest CARB Tier at the time of construction. Equipment proposed for use that does not meet the highest CARB Tier in effect at the time of construction, shall only be approved for use at the discretion of the Community Development Director, or designee. b. Use of electric-powered hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors. c. Designation of an area in any construction site where electric-powered construction vehicles and equipment can charge if the utility provider can provide temporary power for this purpose. d. Identification in site plans of a location for future electric truck charging stations and installation of a conduit to that location.	**Consistent**. As discussed in Section 3.3, Air Quality, the proposed Project would use CARB Tier IV technology for construction. In addition, the equipment list would be approved for use by the Community Development Director, or designee. The proposed Project would also utilize electric-powered hand tools, forklifts, aerial lifts, materials lifts, hoists, pressure washers, plate compactors, and air compressors, and an area would be designated where electric-powered construction vehicles and equipment can charge if the utility provider can provide temporary power for this purpose. In addition, the proposed Project would include 34 EV charging stalls associated with Building 1 and 59 EV charging stalls associated with Building 2. Further, pursuant to **MM AQ-1**, tenants that plan to operate electric trucks would be required to construct electrical charging infrastructure in addition to the required conduits. Therefore, no conflict with this standard would occur.
A Property Maintenance Program shall be submitted for review and approval by the Community Development Director or designee prior to the issuance of building permits. The program shall provide for the regular maintenance of building structures, landscaping, and paved surfaces in good physical condition, and appearance. The methods and maximum intervals for maintenance of each component shall be specified in the program.	**Consistent**. The proposed Project would submit a Property Maintenance Program to the City's Community Development Department for approval that would include the framework for regular maintenance of building structures, landscaping, and paved surfaces in good physical condition and appearance. Therefore, no conflict with this standard would occur.
Facility operators shall coordinate with CARB and SCAQMD to obtain the latest information about regional air quality concentrations, health risks, and trucking regulations.	**Consistent**. As discussed in Section 3.3, Air Quality, the air quality and health risk analysis contained in this Draft EIR is based on the latest information from CARB and SCAQMD. Therefore, no conflict with this standard would occur.
Provisions of the City's Noise Ordinance (Chapter 17.176) shall be satisfied during all site preparation and construction activity. Site preparation activity and construction shall not commence before 7:00 AM and shall cease no later than 5:00 PM, Monday through Friday. Only finish work and similar interior construction may be conducted on Saturdays and may commence no earlier than	**Consistent.** As discussed in Section 3.13, Noise, construction of the proposed Project would comply with applicable provisions of the City's Noise Ordinance (Chapter 17.176 of the City's Municipal Code) pursuant to **RCM N-1**. Therefore, no conflict with this standard would occur.

Table 3.11.E: "Good Neighbor Policy" Consistency Analysis

Standard	Project Consistency
8:00 am and shall cease no later than 4:00 p.m. Construction activity shall not take place on Sunday, or any Legal Holidays. Concrete Pouring activity shall be exempt from the construction days and hours operation identified above (concrete pouring shall not include other construction activities such as framing work). The applicant shall place a weatherproof 3' X 3' sign at the entrance to the project site identifying the approved days and hours of construction activity. The sign shall identify the name and phone number of the development manager to address any complaints.	
Facility hours of business operation for projects with buildings located within 1,000 feet of a sensitive receptor shall be reviewed on a project-by-project basis. A Preliminary Application (PAR) for such projects may be submitted for review by the City Council Executive Project Review Subcommittee and the City's Development Review Committee (DRC). Facility hours of business operations shall be limited to Monday through Friday 7:00 a.m. to 7:00 p.m. and no work shall occur on weekends or Legal Holidays adjacent to sensitive receptors, except when the operator demonstrates through site design and mitigation measures to adequately shield and reduce noise impacts to the sensitive receptors. At no time shall refrigerated trucks parked outdoors run and/or idle outside of the facility hours of operation. Changes to the hours of operation shall be reviewed on a project-by-project basis and shall be included in the Conditions of Approval for the project.	**Consistent**. The Project site is generally bounded by undeveloped land in all directions; however, existing residential uses (two single family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area), respectively along the northwest and southeast sides of Pierce Street, and a nonconforming residence is located outside of and adjacent to the southeast corner of the Project site along Baker Street. As discussed under Standard 1, these residential uses are not considered sensitive uses under the Good Neighbor Policy. Therefore, no conflict with this standard would occur.
At no time during normal business hours shall the noise generated from the adjacent industrial operation exceed 65 dBA as measured from the closest property line of a sensitive receptor.	**Consistent.** As discussed in Section 3.13, Noise, the daytime and nighttime operational noise levels generated by operation of the proposed Project would not exceed the City's exterior daytime and nighttime stationary noise standards, which are lower than 65 dBA.
A City representative shall conduct periodic on-site inspections during and after construction to verify compliance or recommend better efforts toward compliance during grading, construction, and operational activities.	**Consistent**. The proposed Project would coordinate all grading, construction, and operation activities through the City, which would conduct on-site inspections. Therefore, no conflict with this standard would occur.

Source 1: City of Lake Elsinore. *"Good Neighbor Policy" for Warehousing, Logistics, and Distribution Uses,* Policy No. 400-16 (effective April 25, 2023).
Source 2: Riverside Legacy IV Nichols Road, LLC, *Baker Street, Warehouse Project 9PA-2020-103) Good Neighbor Policy Consistency Memo* (September 19, 2024).
[1] Page 2 of the City of Lake Elsinore Good Neighbor Policy.
[2] Page 3 of the City of Lake Elsinore Good Neighbor Policy.

CARB = California Air Resources Board
dBA = A-weighted decibel(s)
EIR = Environmental Impact Report
EV = electric vehicle
MM = mitigation measure
RCM = regulatory compliance measure
SCAQMD = South Coast Air Quality Management District
sf = square foot/feet

Western Riverside County Multiple Species Habitat Conservation Plan. As detailed in Section 3.4, Biological Resources, of this EIR, impacts on candidate, sensitive, or special-status species and associated habitats would be addressed through compliance with Multiple Species Habitat Conservation Plan (MSHCP) policies via implementation of MMs BIO-1 through BIO-11, including development and implementation of a San Diego Ambrosia Translocation Plan; restoration/ expansion of Coulter's goldfields habitat; conducting species-specific surveys (as appropriate) for Crotch's bumble bee, burrowing owl, least Bell's vireo and western spadefoot; conducting worker environmental awareness trainings; erection of temporary sound barriers; and purchase of mitigation lands. Additionally, RCMs HAZ-1 and WQ-1 through WQ-4 would ensure indirect effects associated with development in proximity to the MSHCP Conservation Area remain less than significant. With implementation of MMs BIO-1 through BIO-11 and RCMs HAZ-1 and WQ-1 through WQ-4, the proposed Project would be consistent with the MSHCP.

It should be noted that, according to CEQA, policy conflicts do not, in and of themselves, constitute a significant environmental impact. Policy conflicts are significant environmental impacts only when they would result in direct physical impacts or where those conflicts relate to avoiding or mitigating environmental impacts. As such, associated physical environmental impacts are discussed in this environmental document under specific topical sections. Impacts to land use conflicts would be **less than significant with mitigation incorporated.**

3.11.7 Level of Significance Prior to Mitigation

Without mitigation, there is potential for the proposed Project to conflict with select land use plans, policies, and/or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

3.11.8 Project Design Features, Regulatory Compliance Measures, and Mitigation Measures

PDF AQ-3 **Screening.** *(See Section 3.3, Air Quality)*

PDF AQ-4 **Rideshare and Commute Trip Reduction Program.** *(See Section 3.3, Air Quality)*

PDF AQ-5 **Signage.** *(See Section 3.3, Air Quality)*

MM AQ-1 **Electrification.** *(See Section 3.3, Air Quality)*

MM AQ-3 **Alternative Fuels.** *(See Section 3.3, Air Quality)*

MM AQ-4 **Idling Regulations.** *(See Section 3.3, Air Quality)*

MM AQ-5 **Truck Fleet Operations.** *(See Section 3.3, Air Quality)*

MM AQ-9 **Tenant Lease Agreement.** *(See Section 3.3, Air Quality)*

MM AQ-10 **Truck Emissions.** *(See Section 3.3, Air Quality)*

MM BIO-1 **San Diego Ambrosia Translocation Plan.** *(See Section 3.4, Biological Resources)*

MM BIO-2 **Restore/Expand Coulter's Goldfields Habitat.** *(See Section 3.4, Biological Resources)*

MM BIO-3 **Crotch's Bumble Bee Surveys.** *(See Section 3.4, Biological Resources)*

MM BIO-4 **Restoration of RCA Conserved Lands (Restoration Area).** *(See Section 3.4, Biological Resources)*

MM BIO-5 **Pre-Construction Burrowing Owl Survey.** *(See Section 3.4, Biological Resources)*

MM BIO-6 **Environmental Awareness Training and Sound Barriers.** *(See Section 3.4, Biological Resources)*

MM BIO-7 **Pre-Construction Least Bell's Vireo Surveys and Noise Monitoring.** *(See Section 3.4, Biological Resources)*

MM BIO-8 **Pre-Construction Nesting Bird Survey.** *(See Section 3.4, Biological Resources)*

MM BIO-9 **Western Spadefoot Habitat.** *(See Section 3.4, Biological Resources)*

MM BIO-10 **Mitigation Lands.** *(See Section 3.4, Biological Resources)*

MM BIO-11 **Receipt for Purchased Credits.** *(See Section 3.4, Biological Resources)*

MM CUL-1 **Unanticipated Resources**. *(See Section 3.5, Cultural Resources)*

MM CUL-2 **Archaeologist/CRMP.** *(See Section 3.5, Cultural Resources)*

MM CUL-3 **Cultural Resources Disposition.** *(See Section 3.5, Cultural Resources)*

MM CUL-4 **Tribal Monitoring.** *(See Section 3.5, Cultural Resources)*

MM CUL-5 **Phase IV Report.** *(See Section 3.5, Cultural Resources)*

MM CUL-6 **Discovery of Human Remains.** *(See Section 3.5, Cultural Resources)*

MM CUL-7 **Non-Disclosure of Reburial Location.** *(See Section 3.5, Cultural Resources)*

MM GEO-1: **Compliance with California Building Code and Recommendations Provided in Geotechnical Evaluation.** *(See Section 3.7, Geology and Soils)*

MM GEO-2: **Paleontological Resources Mitigation Plan.** *(See Section 3.7, Geology and Soils)*

RCM HAZ-1	**Hazardous Materials Business Plan.** *(See Section 3.9, Hazards and Hazardous Materials)*
RCM WQ-1	**Construction General Permit and Chapter 14.08 of the City of Lake Elsinore Municipal Code.** *(See Section 3.10, Hydrology and Water Quality)*
RCM WQ-2	**Groundwater Discharge Permit.** *(See Section 3.10, Hydrology and Water Quality)*
RCM WQ-3	**Riverside County MS4 Permit.** *(See Section 3.10, Hydrology and Water Quality)*
RCM WQ-4	**Industrial General Permit.** *(See Section 3.10, Hydrology and Water Quality)*
RCM N-1	**Construction Hours.** *(See Section 3.13, Noise)*
RCM TRA-1	**Transportation Management Plan.** *(See Section 3.17, Transportation)*
RCM FIRE-2	**Adherence to the Fire Protection Plan.** *(See Section 3.20, Wildfire)*
MM FIRE-1	**Fuel Modification Zone Maintenance.** *(See Section 3.20, Wildfire)*

3.11.9 Level of Significance after Mitigation

With implementation of the mitigation measures, PDFs, and RCMs listed above, the proposed Project would be consistent with the intent of the City's General Plan Land Use and zoning designations, the goals and policies contained in the General Plan, and the standards contained in the City's Good Neighbor Policy and would not conflict with SCAG's 2024 RTP/SCS. The proposed Project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant with mitigation incorporated.

3.11.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably probable future projects within the cumulative impact area for land use and planning. The cumulative impact area for land use and planning is the city of Lake Elsinore because the City has the responsibility and authority for land use planning and approving development within the city.

Construction and operation of the proposed Project, combined with cumulative development within the city, would not result in significant land use and planning impacts. As detailed above, the proposed Project would not physically divide an established community and would be consistent with applicable plans, goals, policies, and regulations of the City of Lake Elsinore's General Plan and zoning regulations and with SCAG's 2024 RTP/SCS. Other cumulative development projects must comply with the goals and policies outlined in the applicable plans detailed in this section as part of the CEQA review for each project as it comes forward for approval. Therefore, cumulative land use impacts, in combination with the proposed Project, would be **less than cumulatively significant**.

3.12 MINERAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) discusses the existing setting of mineral resources within and near the city of Lake Elsinore, describes the mineral resources on and in the vicinity of the Project site, sets forth the relevant regulatory requirements that apply to the proposed Project's impact on mineral resources, and evaluates the potential impacts of the proposed Project on mineral resources. This section is based on information provided in the City of Lake Elsinore (City) General Plan,[1] the Multipurpose Open Space Element of the Riverside County General Plan,[2] California Geological Survey (CGS) data,[3] and applicable provisions of the City of Lake Elsinore Municipal Code.[4]

3.12.1 Scoping Process

Potential impacts to mineral resources were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received no comments in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to mineral resources. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this EIR.

3.12.2 Methodology

Impacts on mineral resources were assessed based on thresholds of significance from Appendix G of the *California Environmental Quality Act (CEQA) Guidelines.* This analysis considered the potential for build out of the Project site to impact extraction of mineral resources that may be present at the Project site and generate increased demand for such mineral resources in a manner that would contribute to depletion of the resource or have an adverse physical effect on the environment. Information on mineral resources was compiled from published literature, maps, and aerial photographs. Geologic units and structural features were obtained from maps published by the California Department of Conservation (DOC), including the CGS. Mineral resource impacts that could result from Project-related activities were evaluated based on site conditions; expected construction practices; and materials, locations, and duration of construction and operational activities.

3.12.3 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within Riverside County, Lake Elsinore, and the Project site as it relates to mineral resources.

Based on guidelines adopted by the CGS, areas known as Mineral Resource Zones (MRZs) are classified according to the presence or absence of significant deposits, as defined below. The MRZ designations

1 City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. December 13.

2 County of Riverside. Riverside County General Plan Multipurpose Open Space Element. Pages OS-37 through OS-39. Website: https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/elements/OCT17/Ch05_MOSE_120815.pdf?ver=2017-10-11-102103-833 (accessed July 16, 2024).

3 California Department of Conservation. California Geological Survey, Minerals. Website: https://www.conservation.ca.gov/cgs/minerals (accessed July 16, 2024).

4 City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning (accessed July 16, 2024).

require that a Lead Agency's land use decisions involving designated areas be made in accordance with its mineral resource management policies and that it considers the importance of the mineral resource to the region or the State as a whole, not just to the Lead Agency's jurisdiction.

The following MRZ classifications indicate the potential for a specific area to contain significant mineral resources:

- **MRZ-1:** An MRZ where adequate information indicates that no significant mineral deposits are present or likely to be present.

- **MRZ-2:** An MRZ where adequate information indicates that significant mineral deposits are present, or likely to be present, and development should be controlled. According to Chapter 4.0 of the City's General Plan, "Areas classified MRZ-2a contain discovered mineral deposits that are either measured or indicated reserves. MRZ-2b areas contain discovered reserves that are either inferred reserves (limited data) or are deposits presently considered sub-economic. MRZ-2a classification is of prime importance since it contains known economic mineral deposits."[5]

- **MRZ-3:** An MRZ where the significance of mineral deposits cannot be determined from the available data.

- **MRZ-4:** An MRZ where there is insufficient data to assign any other MRZ designation.

- **SZ Areas:** Areas containing unique or rare occurrences of rocks, minerals, or fossils that are of outstanding scientific significance shall be classified in this zone.

- **IRA Areas:** County or State Division of Mines and Geology Identified Areas where adequate production and information indicates that significant minerals are present.

Of the four categories, lands classified as MRZ-2 are the most important or significant with respect to mineral resource value. MRZ-2 areas are designated by the State of California Mining and Geology Board (SMGB) as being "regionally significant." Such areas are underlain by demonstrated mineral resources or are located where geologic data indicate that significant measured or indicated resources are present.

3.12.3.1 Riverside County

Mineral extraction is an important component of Riverside County's economy and consists of areas where clay, limestone, iron, sand, and aggregates are collected. The County of Riverside (County) designates land within its jurisdiction as Open Space-Mineral Resources, which are areas that allow mineral extraction and processing facilities to be developed, and areas held in reserve for future mineral extraction and processing. According to the Riverside County General Plan, there is no land

[5] From Chapter 4.0 of the City of Lake Elsinore General Plan. Website: https://www.lake-elsinore.org/465/Lake-Elsinore-General-Plan.

that has an Open Space-Mineral Resources land use designation within the Elsinore Area Plan (where the city of Lake Elsinore and the proposed Project are located).[6]

As of February 2015, Riverside County was classified with 83,267 acres of MRZ-1, 71,270 acres of MRZ-2 (including 22,114 acres designated MRZ-2a and 7,428 acres designated MRZ-2b), 1,336,723 acres of MRZ-3, and 1,751,892 acres of MRZ-4.[7] Approximately 11,853 acres of MRZ-2 have been designated as regionally significant by the SMGB. There is no land within Riverside County that the SMGB designates as locally important mineral recovery sites.[8]

3.12.3.2 City of Lake Elsinore

According to the City's General Plan, Special Report No. 165, prepared in 1991 by the DOC, Division of Mines and Geology, identified construction aggregate, clay deposits, and crushed stone with an MRZ-2 designation in the city.[9] As identified in the City's General Plan EIR and the CGS Mineral Land Classification online mapping tool,[10] the areas designated as MRZ-2 are in the northern portion of the City. The rest of the city is designated MRZ-3.[11]

The construction aggregate resource areas include sand and gravel deposits in McVicker Canyon, Rice Canyon, and Temescal Wash, which are located approximately 2 miles west, 1.7 miles southwest, and 3.9 miles northwest, respectively, of the Project site. The mouth and upstream deposit areas at McVicker Canyon are within lands that have been subdivided and developed, thereby eliminating this area from consideration as a sand and gravel reserve. The City's General Plan indicates that the deposits associated with Rice Canyon and Temescal Wash are currently being mined. In addition, a crushed stone site located along Railroad Canyon Road, over 4 miles southeast of the Project site, has been intermittently mined in the past by the Riverside County Transportation Department and other operators as a source of base aggregate for roadway construction. Significant clay resources are also associated with the Alberhill area in the northern portion of the city, located adjacent (northwest) to the Project area. Clays from this area have been used to produce two main types of clay products: heavy products such as sewer pipe, brick, and tile, and refractory products such as fire brick, flue

6 County of Riverside. 2023. Riverside County General Plan, Elsinore Area Plan. Table 2 Statistical Summary of Elsinore Area Plan. December 12. Website: https://planning.rctlma.org/sites/g/files/aldnop416/files/2024-05/ELAP%2012-12-23_0.pdf.(accessed July 16, 2024).

7 County of Riverside. *Draft Program EIR No. 521,* Section 4.14 Mineral Resources. Page 4.14-3. Website: https://planning.rctlma.org/Portals/14/genplan/general_plan_2015/DEIR%20521/DEIR%20No.%20521.pdf (accessed July 16, 2024).

8 Ibid.

9 City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. December 13.

10 California Department of Conservation. California Geological Survey, Mineral Land Classification. Website: https://maps.conservation.ca.gov/cgs/minerals/?page=Mineral-Land-Classification&views=About---MLC-Reports (accessed October 3, 2025).

11 City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR,* Section 3.12, Mineral Resources. August. Certified December 2011.

lining, and pottery. In addition, red "bone clay" is sold directly for cement use. However, the mining activity in this area is being phased out in accordance with approved permits.[12]

According to the DOC, five active mines are located within the city.[13] Table 3.12.A describes the mines located within and immediately adjacent to the city and provides their distances from the Project site.

Table 3.12.A: Mines within 2 Miles of the Project Site

Mine	Distance/Direction from the Project Site	Operation Type	Primary Product(s)	Lead Agency
Nichols Canyon Mine, 91-33-0098	0.3 mile northeast	Open Pit	Sand and Gravel	City of Lake Elsinore
Brighton Alberhill Mine, 91-33-0022	1.3 miles northwest	Open Pit	Clay	City of Lake Elsinore
Alberhill Shale Clay Mine, 91-33-0018	1.8 miles northeast	Open Pit	Clay	County of Riverside
Murdock, 91-33-0073	2.0 miles northeast	Open Pit, Plant/Mill	Sand and Gravel, Clay	City of Lake Elsinore
Budy Canyon Pit, 91-33-0049	7.2 miles southeast	Open Pit	Sand and Gravel	County of Riverside

Source: California Department of Conservation. Mines and Mineral Resources, Mines Online. Website: https://maps.conservation.ca.gov/mol/index.html (accessed July 16, 2024).

3.12.3.3 Project Site

The approximately 140.04-acre Project site consists of undeveloped land and public road rights-of-way (ROWs). The Project site consists of four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of ROW improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities, and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

Under existing conditions, the Project site includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an above-ground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses are located outside of the Project site limits.

[12] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. December 13.

[13] California Department of Conservation. Mines and Mineral Resources, Mines Online. Website: https://maps.conservation.ca.gov/mol/index.html (accessed July 16, 2024).

Since at least as early as 1938, the Project site has been used as a rural residential property with limited agriculture activity.[14] The Project site has no history of mineral resource-related uses, including on-site mining or oil and gas production. The DOC identifies four mines within 2 miles of the Project site, including Nichols Canyon Mine 91-33-0098, Brighton Alberhill Mine 91-33-0022, Alberhill Shale Clay Mine 91-33-0018, and Murdock 91-33-0073.[15]

The Project site is mapped as MRZ-3, a designation assigned to areas that contain known or inferred mineral occurrences of unknown significance.[16] Figure 3.12-1: Mineral Resource Zones depicts the mineral resource zone classifications at the Project site and in the vicinity of the Project site.

3.12.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.12.4.1 Federal Policies and Regulations

No federal mineral resource-related regulations would apply because there are no federal mineral reservations and the Project site is not located on federal lands, nor does it require federal approvals related to mining.

3.12.4.2 State Policies and Regulations

California Geologic Energy Management Division (CalGEM). CalGEM is an agency within the DOC responsible for regulating oil, gas, and geothermal energy development in California. The purpose of CalGEM is to protect public health and safety, environmental quality, and natural resources while overseeing the extraction of oil, gas, and geothermal resources. CalGEM also oversees well operations (for oil, gas, and geothermal wells) from permitting to plugging and abandonment.

Surface Mining and Reclamation Act of 1975. The State of California has recognized that mineral resources are essential to the needs of society and the economic well-being of the State. In 1975, the State Legislature passed the Surface Mining and Reclamation Act (SMARA), Public Resources Code (PRC) Section 2710, et seq. The intent of SMARA is to promote production and conservation of mineral resources, minimize the environmental effects of mining, and ensure mined lands are reclaimed to conditions suitable for alternative uses. Reclaiming land for other uses once mining operations are completed is important for the general health, safety, and welfare of the community. Under SMARA,

[14] EnviroApplications, Inc. 2023. *Phase 1 Environmental Ste Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530.* August 4.

[15] California Department of Conservation. Mines and Mineral Resources, Mines Online. Website: https://maps.conservation.ca.gov/mol/index.html (accessed July 16, 2024).

[16] City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR,* Section 3.12 – Mineral Resources. August. Certified December 2011.

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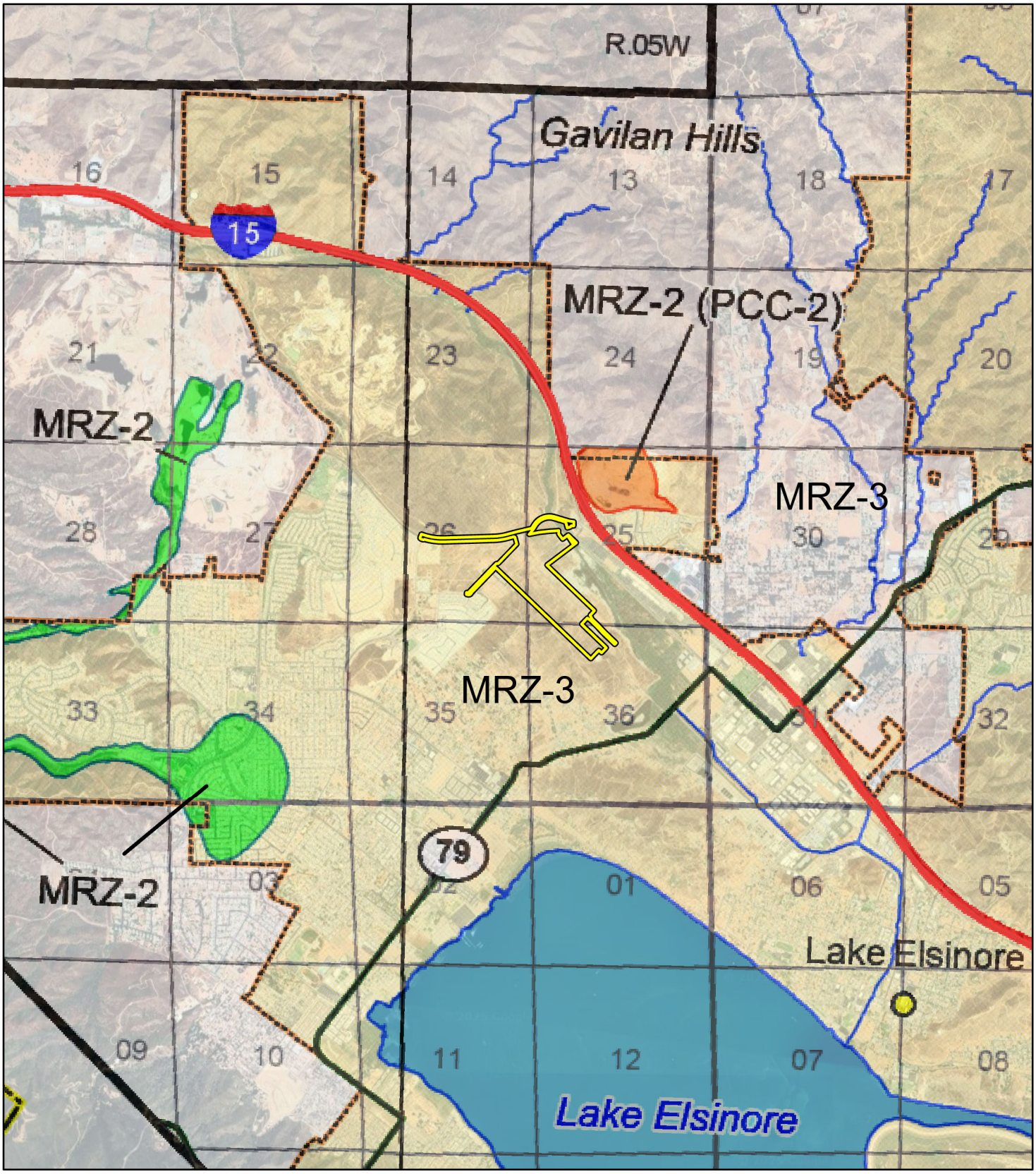

LSA

Project Site (MRZ-3)

Urban Area

Mineral Resource Zones

MRZ-2

New MRZ-2

MRZ-3

0 2000 4000

FEET

FIGURE 3.12-1

Baker Street Warehouse Project

Mineral Resource Zones

SOURCE: Google Imagery (2024); Miller and Busch (2008)

I:\2024\20241799\GIS\Pro\Baker Street Industrial Project\Baker Street Industrial Project.aprx (1/27/2025)

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permits are required for all mining activities commencing operation on or after January 1, 1976. In addition, all new and existing mining operations are required to file a reclamation plan with the appropriate jurisdiction (such as the County of Riverside) to address how the land would be brought back to a productive status once mining operations cease. The County has been given the authority to permit mining operations within the county, adhering to the SMARA legislation. Under this authority, the County has set forth regulations for mineral extraction and reclamation within unincorporated areas of Riverside County via Ordinance No. 555 (Implementing SMARA in Riverside County).

SMARA also requires every lead agency (such as the City) within which a mineral resource zone has been classified by the State Geologist or has been designated as having regional economic significance by the SMGB, to integrate MRZs into their General Plans to ensure responsible land use planning and conservation of important mineral resources. Additionally, lead agencies must establish Mineral Resource Management Policies (MRMPs) for the mineral resources in their General Plans.

Under current SMARA statutes (PRC Section 2763), prior to permitting a use that would threaten the potential to extract minerals in an area designated by the SMGB as having mineral resources of regional or statewide significance, the lead agency must prepare "a statement specifying its reasons for permitting the proposed use." In it, the lead agency must consider its MRMPs, balance "the mineral values against alternative land uses, [and] consider the importance of the minerals to their market region as a whole and not just their importance to the city area." This process is designed to ensure that decision makers weigh the economic and environmental value of mineral resources before deciding on land uses that could impact extraction and availability of those resources.

3.12.4.3 Regional Policies and Regulations

County of Riverside Ordinance No. 555. Ordinance No. 555 implements SMARA and addresses the importance of mineral extraction to the economic well-being of the County of Riverside. It regulates all surface mining operations in the unincorporated portions of the county, as authorized by SMARA, to ensure that:

- The production and conservation of minerals is encouraged while considering and balancing values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment and, at the same time, eliminating or minimizing the residual hazards to public health and safety.

- The adverse effects of surface mining operations are prevented or minimized and that mined lands are reclaimed to a useable condition readily adaptable for alternative land use.

- The reclamation of mined lands is carried out in a way that permits the continued mining of minerals.

3.12.4.4 Local Policies and Regulations

City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. Section 4.5 of the City's General Plan describes existing mineral resources within the city. The following goals and policies apply to the proposed Project:

- **Goal 5:** Balance the importance of conserving mineral resource areas that have been determined to be significant, the need for extracted materials for local construction, and the potential impacts and conflicts that may result.

    - **Policy 5.3:** The City shall encourage the reuse and recycling of existing aggregate construction material for new residential, commercial, and industrial development.

    - **Implementation Program:** Through the project, CEQA and permitting processes, the City shall ensure a balance between the conservation of significant mineral resources, the need for extracted materials for local construction, and proper mitigation for potential impacts and conflicts between uses.

3.12.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Thresholds of Significance.* Based on these thresholds, implementation of the proposed Project could have a significant adverse impact related to mineral resources if it would:

Threshold 3.12.1: Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State, or

Threshold 3.12.2: 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.

3.12.6 Project Impacts

Threshold 3.12.1: Would the Project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?

Less Than Significant Impact. The Project site is mapped as MRZ-3, a designation assigned to areas that contain known or inferred mineral occurrences of unknown significance (see Figure 3.12-1).[17]

The 140.04-acre Project site is irregular in shape and generally bounded by undeveloped land in all directions; however, existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). The Project site and public road ROWs that would be improved with the Project have never been used as a mineral resource recovery site. In addition, the Project site has no history of mineral resource related uses, including on-site mining or oil and gas production.

None of the existing zoning designations of the Project site provide for mineral resource related activities. The Project site has General Plan Land Use designations of Limited Industrial and Floodway

[17] City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR,* Section 3.12 – Mineral Resources. August. Certified December 2011.

and zoning designations of Limited Manufacturing (M-1), General Manufacturing (M-2), and Open Space/Floodway (OS). As it relates to the proposed Project, the Limited Industrial land use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses." The intent of the M-2 zoning district is to reserve appropriate locations for a full range of industrial, manufacturing, and related establishments in order to strengthen the City's economic base and to increase employment opportunities.[18] The OS zoning district identifies areas of the city that are not suited for residential or other intensive use for the reason that they may endanger the health, safety, and welfare of persons due to flooding, fire, or erosion, and those areas designated to allow citizens to pursue recreational activities. [19]

The proposed Project includes a zone change to amend the zoning of the M-1 portion of the Project site to M-2 for zoning consistency and would develop the Project site with industrial warehouse uses consistent with the intent of the Limited Industrial General Plan designation and M-2 zoning district. Even with this zoning change, neither the Project's existing nor proposed land use and zoning designation allow for mineral resources extraction at the Project site or in the surrounding area.

Additionally, because the Project site is not designated MRZ-2 and there is no history of mineral exploration or development on the Project site, the Project site and its vicinity are not considered a State-designated mineral resource extraction zone. Moreover, the Project would not impair or degrade access to any nearby mineral production facilities. Therefore, impacts from the loss of available mineral resources would be **less than significant**.

Threshold 3.12.2: Would the Project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. As discussed above, the Project site is mapped as MRZ-3, has General Plan Land Use designations of Limited Industrial and Floodway, and has zoning designations M-1, M-2, and OS. As such, the Project site has not been delineated as an important mineral resource recovery site in the current General Plan or in any Specific Plan or other land use plan.

In addition, the Project will have no impact on mineral extraction activities within or outside of the Project site boundaries. Existing zoning designations on the Project site do not permit mineral extraction. The proposed Project includes a zone change to amend the zoning of the M-1 portion of the Project site to M-2 for zoning consistency and would develop that portion of the Project site with industrial warehouse uses consistent with the intent of the Limited Industrial General Plan designation and M-2 zoning district. This change to M-2 still would not permit mineral extraction, but it would permit ancillary uses with a conditional use permit. Thus, the Project with this zoning change designation would not affect the availability of mineral resources.

Moreover, no mineral resource recovery sites are located on or adjacent to the Project site. Finally, the Project would not impact or impair mineral extraction activities from any nearby facilities. The

[18] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.140: M-2 General Manufacturing District (accessed July 12, 2024).

[19] City of Lake Elsinore. Lake Elsinore Municipal Code, Title 17: Zoning, Chapter 17.100: (OS) Open Space District (accessed July 12, 2024).

nearest active mine to the Project site is the Nichols Canyon Mine (91-33-0098), located 0.3-mile northeast of the Project site on the opposite (east) side of Interstate (I-)15. Development of the proposed Project would not impact mineral extraction activities at the Nichols Canyon Mine because development of the proposed Project on the west side of I-15 would not interfere with mineral extraction activities on the east side of I-15.

In addition, mineral resources extraction would conflict with the intent of the City's General Plan, which does not identify the Project site as an area for mineral resource recovery. Therefore, implementation of the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. **No impact** would occur.

3.12.7 Level of Significance Prior to Mitigation

From the analysis above, the Project would neither result in the loss of availability of a known mineral resource nor result in the loss of availability of a locally important mineral resource recovery site. Therefore, the Project would not result in any potentially significant impacts related to mineral resources.

3.12.8 Compliance Measures and Mitigation Measures

No compliance measures are applicable to the proposed Project because the proposed Project does not involve mineral extraction activities and the Project site is not designated for mineral extraction under existing or proposed zoning.

As a result, the proposed Project would not result in any significant adverse impacts related to mineral resources. Therefore, no mitigation measures would be required.

3.12.9 Level of Significance after Mitigation

As indicated above, there would be no significant unavoidable adverse impacts of the proposed Project related to mineral resources. Therefore, no mitigation measures are required.

3.12.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for mineral resources. Because the City of Lake Elsinore is responsible for land use, zoning, and permitting for mining activities and CEQA evaluates whether cumulative extraction within the same jurisdiction could deplete the mineral resource for local development needs, the cumulative impact area for mineral resources is the city.

As indicated in prior sections, implementation of the proposed Project would not result in the loss of known mineral resources; however, the related projects in the cumulative input area have the potential to develop on or near land that is designated as an MRZ-2 or MRZ-3 or delineated as a locally important mineral resource area. Furthermore, no mineral resource extraction is planned to occur on or near the Project site, and the Project would not impede access to outside mineral extraction activities in the cumulative impact area. The analysis presented above indicates that the Project site

is in an area designated as an MRZ-3; however, it has never been used as a mineral resource recovery site. Moreover, the Project site is not designated as MRZ-2 and thus does not have any known significant mineral deposits present.

Additionally, the City of Lake Elsinore General Plan has not delineated the Project site as a locally important mineral resource recovery site, but rather has delineated the site for industrial and floodway uses. For these reasons, implementation of the proposed Project would neither cumulatively contribute to the loss of known mineral resources nor cumulatively contribute to the loss of the development of a site that has been delineated as a locally important mineral resource recovery area by the City. As such, implementation of the proposed Project would not result in a cumulatively considerable impact.

Pursuant to SMARA requirements, cities must incorporate into their general plans mapped designations of mineral resource zones that are approved by the SMGB. The City of Lake Elsinore General Plan provides goals, policies, and programs related to mineral resources and locally important mineral resource recovery sites to ensure compatibility between future development and existing and future mineral resource recovery operations. Each project would be subject to environmental review (and mitigation measures as applicable) and jurisdictional goals, policies, and programs related to mineral resources to ensure they are not located on land that contains known mineral resources or is designated as a locally important mineral resource recovery site. In addition, environmental review of future development would also analyze and disclose the future projects' contribution to a cumulative impact. The environmental review, any applicable mitigation measures, and jurisdictional goals/policies/programs would reduce the cumulative impact for mineral resources.

Therefore, when considered in conjunction with past, present, and future projects, the proposed Project's cumulative contribution to impacts pertaining to mineral resources would be **less than cumulatively considerable.**

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3.13 NOISE

This section of the Draft Environmental Impact Report (EIR) discusses the existing noise environment and conditions at the Project site and in the surrounding area and provides an analysis of the potential noise and vibration impacts anticipated with implementation of the proposed Project. This section also discusses applicable local regulations and policies from the City of Lake (City) Elsinore General Plan and City of Lake Elsinore Municipal Code pertaining to noise and vibration and provides recommended measures pursuant to the California Environmental Quality Act (CEQA), if applicable. This section summarizes information provided in the *Baker Lake Elsinore Noise and Vibration Analysis, City of Lake Elsinore*.[1] This report is included as Appendix L to this Draft EIR.

3.13.1 Scoping Process

Potential impacts from noise and vibration were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received three comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to noise and vibration. NOP comments related to noise and vibration included comments from the following:

- Jeffrey Ong, July 10, 2024, expressed concerns regarding noise pollution.
- California Department of Justice's Bureau of Environmental Justice, July 17, 2024, Christie Vosburg for Rob Bonta, raised concerns regarding the Project's potential impacts to noise in the Project vicinity.
- Briana Sara and Elliot Ruhland, August 19, 2024, expressed concern regarding noise.

For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.13.2 Fundamentals

3.13.2.1 Noise

Noise is simply defined as "unwanted sound."[2] Sound becomes unwanted when it interferes with normal activities, when it causes actual physical harm, or when it has adverse effects on health. Noise is measured on a logarithmic scale of sound pressure level known as a decibel (dB). A-weighted decibels (dBA) approximate the subjective response of the human ear to broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies which are audible to the human ear. Table 3.13.A presents a summary of the typical noise levels and their subjective loudness and effects that are described in more detail below.

1 Urban Crossroads, 2025. Baker Lake Elsinore Noise and Vibration Analysis. March 24.
2 City of Lake Elsinore. 2011. *General Plan Noise Element*, Section 3.7.1. December 13.

Table 3.13.A: Typical Noise Levels

COMMON OUTDOOR ACTIVITIES	COMMON INDOOR ACTIVITIES	A - WEIGHTED SOUND LEVEL dBA	SUBJECTIVE LOUDNESS	EFFECTS OF NOISE
THRESHOLD OF PAIN		140	INTOLERABLE OR DEAFENING	HEARING LOSS
NEAR JET ENGINE		130		
		120		
JET FLY-OVER AT 300m (1000 ft)	ROCK BAND	110		
LOUD AUTO HORN		100	VERY NOISY	
GAS LAWN MOWER AT 1m (3 ft)		90		
DIESEL TRUCK AT 15m (50 ft), at 80 km/hr (50 mph)	FOOD BLENDER AT 1m (3 ft)	80		SPEECH INTERFERENCE
NOISY URBAN AREA, DAYTIME	VACUUM CLEANER AT 3m (10 ft)	70	LOUD	
HEAVY TRAFFIC AT 90m (300 ft)	NORMAL SPEECH AT 1m (3 ft)	60		
QUIET URBAN DAYTIME	LARGE BUSINESS OFFICE	50	MODERATE	SLEEP DISTURBANCE
QUIET URBAN NIGHTTIME	THEATER, LARGE CONFERENCE ROOM (BACKGROUND)	40		
QUIET SUBURBAN NIGHTTIME	LIBRARY	30	FAINT	NO EFFECT
QUIET RURAL NIGHTTIME	BEDROOM AT NIGHT, CONCERT HALL (BACKGROUND)	20		
	BROADCAST/RECORDING STUDIO	10	VERY FAINT	
LOWEST THRESHOLD OF HUMAN HEARING	LOWEST THRESHOLD OF HUMAN HEARING	0		

Source: Environmental Protection Agency Office of Noise Abatement and Control, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety (EPA/ONAC 550/9-74-004) (March 1974).

Range of Noise. Since the range of intensities that the human ear can detect is so large, the scale frequently used to measure intensity is a scale based on multiples of 10 (i.e., the logarithmic scale). The scale for measuring intensity is the decibel scale. Each interval of 10 dB indicates a sound energy 10 times greater than before, which is perceived by the human ear as being roughly twice as loud.[3] The most common sounds vary between 40 dBA (very quiet) to 100 dBA (very loud). Normal conversation at 3 feet is roughly at 60 dBA, while loud jet engine noises equate to 110 dBA at approximately 1,000 feet, which can cause serious discomfort.[4] Another important aspect of noise is the duration of the sound and the way it is described and distributed in time.

Noise Descriptors. Environmental noise descriptors are generally based on average, rather than instantaneous, noise levels. The most used metric is the equivalent continuous sound level (L_{eq}). The L_{eq} is not measured directly but is calculated from sound pressure levels typically measured in A-weighted decibels. The L_{eq} represents a steady-state sound level containing the same total energy as

[3] California Department of Transportation. 2013. *Technical Noise Supplement - A Technical Supplement to the Traffic Noise Analysis Protocol.* September.

[4] Environmental Protection Agency Office of Noise Abatement and Control. 1974. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety.* EPA/ONAC 550/9/74-004. March.

a time-varying signal over a given sample period and is commonly used to describe the "average" noise levels within the environment.

Peak-hour or average noise levels, while useful, do not completely describe a given noise environment. Noise levels lower than peak hour may be disturbing if they occur during times when quiet is most desirable, namely evening and nighttime (sleeping) hours. To account for this, the Community Noise Equivalent Level (CNEL) or the day/night level, representing a composite 24-hour noise level is utilized. The CNEL is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 5 dB to dBA L_{eq} sound levels in the evening from 7:00 p.m. to 10:00 p.m., and the addition of 10 dB to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m. Similarly, the day/night level is the weighted average of the intensity of a sound, with corrections for time of day, and averaged over 24 hours. The time-of-day corrections require the addition of 10 dB to dBA L_{eq} sound levels at night between 10:00 p.m. and 7:00 a.m.[5] These additions are made to account for the noise-sensitive time periods during the evening and night hours when noise can become more intrusive. CNEL and the day/night level does not represent the actual sound level heard at any time but rather represents the total sound exposure.

Sound Propagation. When sound propagates over a distance, it changes in level and frequency content. The way noise reduces with distance depends on the following factors.

Geometric Spreading. Sound from a localized source (i.e., a stationary point source) propagates uniformly outward in a spherical pattern. The sound level attenuates (or decreases) at a rate of 6 dB for each doubling of distance from a point source. Highways consist of several localized noise sources on a defined path and hence can be treated as a line source, which approximates the effect of several point sources. Noise from a line source propagates outward in a cylindrical pattern, often referred to as cylindrical spreading. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source.[6]

Ground Absorption. The propagation path of noise from a highway to a receiver is usually very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation associated with geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is usually sufficiently accurate for distances of less than 200 feet. For acoustically hard sites (i.e., sites with a reflective surface between the source and the receiver, such as a parking lot or body of water), no excess ground attenuation is assumed. For acoustically absorptive or soft sites (i.e., sites with an absorptive ground surface between the source and the receiver, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dB per doubling of distance is normally assumed. When added to the cylindrical

5 California Department of Transportation. 2013. *Technical Noise Supplement - A Technical Supplement to the Traffic Noise Analysis Protocol.* September.

6 Ibid.

spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dB per doubling of distance from a line source.[7]

Atmospheric Effects. Receivers located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lowered noise levels. Unless wind conditions are specifically identified, noise levels are always assumed to be for zero wind. Normally, sound decreases with elevation. However, sound levels can be increased at large distances (e.g., more than 500 feet) due to atmospheric temperature inversion (i.e., increasing temperature with elevation), resulting in temporary sound increases. Other factors, such as air temperature, humidity, and turbulence, can also have effects; however, because these factors have such a complex effect on noise, no noise measurements are made based on these factors.[8]

Shielding. A large object or barrier in the path between a noise source and a receiver can substantially attenuate noise levels at the receiver. The amount of attenuation provided by shielding depends on the size of the object and the frequency content of the noise source. Shielding by trees and other such vegetation typically only has an "out of sight, out of mind" effect. That is, the perception of noise impact tends to decrease when vegetation blocks the line-of-sight to nearby residents. However, for vegetation to provide a substantial, or even noticeable, noise reduction, the vegetation area must be at least 15 feet in height, 100 feet wide, and dense enough to completely obstruct the line-of-sight between the source and the receiver. This size of vegetation may provide up to 5 dBA of noise reduction.[9] The Federal Highway Administration (FHWA) does not consider the planting of vegetation to be a noise abatement measure.[10]

Noise Control. Noise control is the process of obtaining an acceptable noise environment for an observation point or receiver by controlling the noise source, transmission path, receiver, or all three. This concept is known as the source-path-receiver concept. In general, noise control measures can be applied to these three elements (noise source, transmission path, and receiver).[11]

Noise Barrier Attenuation. Effective noise barriers can reduce noise levels by 10 to 15 dBA, cutting the loudness of traffic noise in half. A noise barrier is most effective when placed close to the noise source or receiver. Noise barriers, however, do have limitations. For a noise barrier to work, it must block the line-of-sight path of sound from the noise source.[12]

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7 United States Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. Highway Traffic Noise Analysis and Abatement Policy and Guidance. December 2011.

8 California Department of Transportation. Technical Noise Supplement - A Technical Supplement to the Traffic Noise Analysis Protocol. September 2013.

9 United States Department of Transportation Federal Highway Administration. Highway Noise Barrier Design Handbook. 2001.

10 United States Department of Transportation Federal Highway Administration. State Highway Agency Noise Policy Template. Updated August 24, 2017.

11 Urban Crossroads, Inc. *Baker Lake Elsinore Noise and Vibration Analysis*. March 24, 2025.

12 Ibid.

Land Use Compatibility with Noise. For example, schools, hospitals, churches, and residences are more sensitive to noise intrusion than are commercial or industrial developments and related activities. As ambient noise levels affect the perceived amenity or livability of a development, so too can the mismanagement of noise impacts impair the economic health and growth potential of a community by reducing the area's desirability as a place to live, shop, and work. For this reason, land use compatibility with the noise environment is an important consideration in the planning and design process. The FHWA encourages State and local government to regulate land development in such a way that noise-sensitive land uses are either prohibited from being located adjacent to a highway, or that the developments are planned, designed, and constructed in such a way that noise impacts are minimized.[13]

Community Response to Noise. Approximately 16 percent of the population has a very low tolerance for noise and will object to any noise not of their making. Consequently, even in the quietest environment, some complaints may occur. Another 20 to 30 percent of the population will not complain even in very severe noise environments.[14] Thus, a variety of reactions can be expected from people exposed to any given noise environment.

Surveys have shown that community response to noise varies from no reaction to vigorous action for newly introduced noises averaging from 10 dB below existing to 25 dB above existing.[15] According to research originally published in the Noise Effects Handbook,[16] the percentage of high annoyance ranges from approximately 0 percent at 45 dB or less to 10 percent highly annoyed around 60 dB, and then increases rapidly to approximately 70 percent highly annoyed at approximately 85 dB or greater. Despite this variability in behavior on an individual level, the population can be expected to exhibit the following responses to changes in noise levels: a change of 1 dBA is considered just perceptible, a change of 3 dBA is considered barely perceptible, a change of 5 dBA is considered readily perceptible, and a change of 10 dBA is twice as loud.[17]

3.13.2.2 Vibration

Per the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual,* vibration is the periodic oscillation of a medium or object. The rumbling sound caused by the vibration of room surfaces is called structure-borne noise. Sources of ground-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human-made causes (e.g., explosions, machinery, traffic, trains, construction equipment). Vibration sources may be

13 United States Department of Transportation, Federal Highway Administration. 2000. *Highway Traffic Noise in the United States, Problem and Response.* April. p. 3.

14 United States Environmental Protection Agency Office of Noise Abatement and Control. 1979. *Noise Effects Handbook-A Desk Reference to Health and Welfare Effects of Noise.* October. Revised July 1981.

15 United States Department of Transportation, Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123.* September.

16 United States Environmental Protection Agency Office of Noise Abatement and Control. 1979. *Noise Effects Handbook-A Desk Reference to Health and Welfare Effects of Noise.* EPA 550/9/82/106. October. Revised July 1981.

17 United States Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. 2011. Highway Traffic Noise Analysis and Abatement Policy and Guidance. December.

continuous, such as factory machinery, or transient, such as explosions. As is the case with airborne sound, ground-borne vibrations may be described by amplitude and frequency. Additionally, in contrast to airborne noise, ground-borne vibration outdoors is not a common environmental problem and annoyance from ground-borne vibration is almost exclusively an indoor phenomenon.[18] Therefore, the effects of vibrations should only be evaluated at a structure and the effects of the building structure on the vibration should be considered. Wood-frame buildings, such as typical residential structures, are more easily excited by ground vibration than heavier buildings. In contrast, large masonry buildings with spread footings have a low response to ground vibration[19]. In general, the heavier a building is, the lower the response will be to the incident vibration energy.[20] However, all structures reduce vibration levels due to the coupling of the building to the soil.

There are several different methods that are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal.[21] The PPV is most frequently used to describe vibration impacts to buildings but is not always suitable for evaluating human response (annoyance) because it takes some time for the human body to respond to vibration signals. Instead, the human body responds to average vibration amplitude often described as the root mean square (RMS). The RMS amplitude is defined as the average of the squared amplitude of the signal and is most frequently used to describe the effect of vibration on the human body.[22] However, the RMS amplitude and PPV are related mathematically, and the RMS amplitude of equipment is typically calculated from the PPV reference level. The RMS amplitude is approximately 70 percent of the PPV.[23] Thus, either can be used in the description of vibration impacts.

3.13.3 Methodology

The evaluation of noise and vibration impacts associated with the proposed Project includes the following:

- Determine if short-term Project construction noise would exceed the City's mobile and stationary construction noise standards at off-site noise-sensitive uses.

- Determine if short-term Project construction noise would substantially increase ambient noise levels on off-site noise-sensitive uses in excess of the City's mobile and stationary construction noise standards.

[18] United States Department of Transportation, Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual,* FTA Report No. 0123. September.
[19] United States Department of Transportation, Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual,* FTA Report No. 0123. September.
[20] Ibid.
[21] Ibid.
[22] Ibid.
[23] California Department of Transportation. 2000. *Transportation and Construction Vibration Guidance Manual.* April.

- Determine if long-term operation of the Project, including vehicular traffic and stationary noise sources, would result in noise levels that exceed the noise standards in the City's General Plan Noise Element and Municipal Code.

- Determine if long-term operation of the Project, including vehicular traffic and stationary noise sources, would substantially increase ambient noise levels at off-site noise-sensitive uses.

- Determine if Project construction activities and operations would generate excessive ground-borne vibration or ground-borne noise levels in excess of the City's vibration standard.

- Determine the potential for cumulative long-term noise exposure to on-site noise-sensitive uses resulting from noise generated during Project operation in combination with aircraft noise impacts.

- As needed, evaluate the proposed mitigation measures and their effectiveness in reducing Project-related construction and operational noise and vibration impacts.

3.13.4 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within the Project area as it relates to noise.

The 140.04-acre Project site comprises four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities; and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

3.13.4.1 Sensitive Uses in the Project Vicinity

Sensitive receivers are generally defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land. Noise-sensitive land uses are generally considered to include schools, hospitals, single-family dwellings, mobile home parks, churches, libraries, and recreation areas. Moderately noise-sensitive land uses typically include multifamily dwellings, hotels, motels, dormitories, outpatient clinics, cemeteries, golf courses, country clubs, athletic/tennis clubs, and equestrian clubs. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include industrial, manufacturing, utilities, agriculture, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.[24] The following describes the closest noise-sensitive receiver locations in the vicinity of the Project site. The locations of the noise-sensitive receivers are shown on Figure 3.13-1.

[24] Urban Crossroads. 2025. *Baker Lake Elsinore Noise and Vibration Analysis*. March 24.

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LSA

Onsite Development Area

Receiver Locations

Distance from receiver to Onsite Development Area (in feet)

0 375 750

FEET

FIGURE 3.13-1

Baker Street Warehouse Project

Receiver Locations

SOURCE: Urban Crossroads

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- **Receiver R1** represents the existing residence at 28750 Pierce Street, approximately 92 feet west of the Project site. Receiver R1 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was conducted near this location, L1, to describe the existing ambient noise environment.

- **Receiver R2** represents the residence under development on Florence Drive, approximately 1,216 feet west of the Project site. Receiver R2 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was conducted near this location, L2, to describe the existing ambient noise environment.

- **Receiver R3** represents the existing residence at 29093 Gunder Avenue, approximately 1,515 feet southwest of the Project site. R3 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was conducted near this location, L3, to describe the existing ambient noise environment.

- **Receiver R4** represents the existing residence at 16950 Gunnerson Street, approximately 1,380 feet southeast of the Project site. R4 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was conducted near this location, L4, to describe the existing ambient noise environment.

- **Receiver R5** represents the existing residence at 17250 Gunnerson Street, approximately 1,393 feet south of the Project site. R5 is placed in the private outdoor living area (backyard) facing the Project site. A 24-hour noise measurement was conducted near this location, L5, to describe the existing ambient noise environment.

- **Receiver R6** represents the existing legal non-conforming residence at 17401 Baker Street, approximately 155 feet east of the Project site. R6 is placed in the private outdoor living areas (backyards) facing the Project site. A 24-hour noise measurement was taken near this location, L6, to describe the existing ambient noise environment.

3.13.4.2 Existing Noise Environment

A total of six long-term 24-hour noise level measurements were conducted by Urban Crossroads, Inc. on Tuesday, June 25, 2024, in the vicinity of the Project site to describe and document the existing noise environment surrounding the Project site. Table 3.13.B summarizes the results of the long-term noise level measurements. The noise measurement locations are shown on Figure 3.13-2.

Table 3.13.B: Ambient Noise Level Measurements

Location[1]	Description	Noise Level (dBA)		
		L_{eq}[2]		CNEL
		Daytime[3]	Nighttime[4]	
L1	Located west of the Project site near the residence at 28750 Pierce Street.	52.4	50.3	57.2
L2	Located west of the Project site near the future residence at Florence Drive.	54.9	48.3	57.0
L3	Located southwest of the Project site near the residence at 29093 Gunder Avenue.	51.7	45.0	53.4
L4	Located south of the Project site near the residence at 16950 Gunnerson Street.	57.7	54.0	61.7
L5	Located south of the Project site near the residence at 17250 Gunnerson Street.	55.9	52.5	60.2
L6	Located east of the Project site near the residence at 17401 Baker Street.	52.0	53.9	60.2

Source: Urban Crossroads, *Baker Lake Elsinore Noise and Vibration Analysis*, (March 24, 2025).

[1] The noise measurement locations are shown on Figure 3.13-2.

[2] Energy (logarithmic) average levels.

[3] Daytime hours are from 7:00 a.m. to 10:00 p.m.

[4] Nighttime hours are from 10:00 p.m. to 7:00 a.m.

CNEL = Community Noise Equivalent Level

dBA = A-weighted decibels

L_{eq} = equivalent continuous sound level

LSA

Onsite Development Area

Measurement Locations

N

0 375 750

FEET

FIGURE 3.13-2

Baker Street Warehouse Project

Noise Measurement Locations

SOURCE: Urban Crossroads

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3.13.5 Regulatory Setting

3.13.5.1 Local Regulations

City of Lake Elsinore General Plan. The City of Lake Elsinore General Plan[25] addresses noise in Section 3.7 under the Public Safety and Welfare chapter to control and abate environmental noise, and to protect the citizens of Lake Elsinore from excessive exposure to noise. In the Public Safety and Welfare chapter of the General Plan, the City establishes noise standards for new developments impacted by transportation noise sources such as arterial roads, freeways, airports, and railroads. In addition, the General Plan has established policies to protect residents from excessive noise. Below is the City's noise goal (Goal 7) and policy (Policy 7.1) that are applicable to the Project.

Goal 7 Maintain an environment for all City residents and visitors free of unhealthy, obtrusive, or otherwise excessive noise.

Policy 7.1 Apply the noise standards set forth in the Lake Elsinore Noise and Land Use Compatibility Matrix (see Table 3.13.C) and Interior and Exterior Noise Standards (see Table 3.13.D) when considering all new development and redevelopment proposed within the City.

City of Lake Elsinore Municipal Code. Section 17.176.060 of the City's Municipal Code[26] states that no person shall operate, or cause to be operated, any source of sound at any location within the incorporated city or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person which causes the noise level when measured on any other property, either incorporated or unincorporated, to exceed the maximum permissible sound levels by receiving land use are shown in Table 3.13.E.

Section 17.176.080[F] of the City's Municipal Code prohibits noise from operating, or causing the operation of, any tools of equipment used in construction, drilling, repair, alteration, or demolition work that creates a noise disturbance across a residential or commercial real property line between the hours of 7:00 p.m. and 7:00 a.m. on weekdays or at any time on weekends or holidays, except for public service utilities, or by a variance issued by the City. Also, where technically and economically feasible, construction activities shall be conducted in such a manner that the maximum noise levels at the affected properties will not exceed the noise standards shown in Table 3.13.F. In addition, all mobile or stationary internal combustion engine-powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order.

[25] City of Lake Elsinore. 2011. General Plan. December 13.
[26] City of Lake Elsinore. 2024. Municipal Code. Chapter 17.176—Noise Control. May 28.

Table 3.13.C: Noise and Land Use Compatibility Matrix

Land Use Categories		Day-Night Noise Level (LDN)						
Categories	**Uses**	**≤55**	**60**	**65**	**70**	**75**	**80≥**	
Residential	Single, Family, Duplex, Multiple Family	A	A	B	B	C	D	D
Residential	Mobile Homes	A	A	B	C	C	D	D
Commercial Regional District	Hotel, Motel, Transient Lodging	A	A	B	B	C	C	D
Commercial Regional Village, District Special	Commercial, Retail, Bank, Restaurant, Movie Theatre	A	A	A	A	B	B	C
Commercial Industrial Institutional	Office Building, Research and Development, Professional Offices, City Office Building	A	A	A	B	B	C	D
Commercial Regional Institutional Civic Center	Amphitheatre, Concert Hall Auditorium, Meeting Hall	B	B	C	C	D	D	D
Commercial Recreation	Children's Amusement Park, Miniature Golf Course, Go-cart Track, Equestrian Center, Sports Club	A	A	A	B	B	D	D
Commercial General, Special Industrial Institutional	Automobile Service Station, Auto Dealership, Manufacturing, Warehousing, Wholesale, Utilities	A	A	A	A	B	B	B
Institutional General	Hospital, Church, Library, Schools, Classroom	A	A	B	C	C	D	D
Open Space	Parks	A	A	A	B	C	D	D
Open Space	Golf Course, Cemeteries, Nature Centers, Wildlife Reserves, Wildlife Habitat	A	A	A	A	B	C	C
Agriculture	Agriculture	A	A	A	A	A	A	A
Interpretation								
Zone A Clearly Compatible	Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.							
Zone B Normally Compatible	New construction or development should be undertaken only after detailed analysis of the noise reduction requirements are made and needed nose insulation features in the design are determined. Conventional construction, with closed windows and fresh air supply systems or air conditioning, will normally suffice.							
Zone C Normally Incompatible	New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of noise reduction requirements must be made and needed noise insulation features included in the design.							
Zone D Clearly Incompatible	New construction or development should generally not be undertaken.							

Source: City of Lake Elsinore General Plan, Public Safety and Welfare, Table 3-1 (2011).

Table 3.13.D: Interior and Exterior Noise Standards

Land Use Categories		Noise Standards (dBA L_{dn})	
Categories	**Uses**	**Interior**	**Exterior**
Residential	Single Family, Duplex, Multiple Family	45[3,5]	60
	Mobile Homes	--	60[4]
Commercial, Institutional	Hotel, Motel, Transient Lodging	45[5]	--
	Hospital, School Classroom	45	--
	Church, Library	45	--

Source: City of Lake Elsinore General Plan, Public Safety and Welfare, Table 3-2 (2011).

[1] Indoor environment excluding: bathrooms, toilets, closets, corridors.

[2] Outdoor environment limited to: private yard of single-family home, multifamily private patio or balcony which is served by a means of exit from inside, and mobile home park.

[3] Noise level requirement with closed windows. Mechanical ventilating system or other means of natural ventilation shall be provided as of Chapter 12, Section 1205, of the Uniform Building Code.

[4] Exterior noise level should be such that interior noise level will not exceed 45 dBA CNEL.

[5] As per California Administrative Code, Title 24, Part 6, Division T25, Chapter 1, Subchapter 1, Article 4, Section T25-28.

CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
L_{dn} = day/night noise level

Table 3.13.E: Operational Exterior Noise Level Standards

Affected Land Use (Receiving Noise)	Time Period	Noise Level (dBA)				
		L_{50}	L_{25}	L_8	L_2	L_{max}
Single-Family Residential	10:00 p.m. to 7:00 a.m.	40	45	50	55	60
	7:00 a.m. to 10:00 p.m.	50	55	60	65	70
Multiple-Dwelling Residential	10:00 p.m. to 7:00 a.m.	45	50	55	60	65
	7:00 a.m. to 10:00 p.m.	50	55	60	65	70
Limited Commercial and Office	10:00 p.m. to 7:00 a.m.	55	60	65	70	75
	7:00 a.m. to 10:00 p.m.	60	65	70	75	80
General Commercial	10:00 p.m. to 7:00 a.m.	60	65	70	75	80
	7:00 a.m. to 10:00 p.m.	65	70	75	80	85
Light Industrial	Anytime	70	75	80	85	90
Heavy Industrial	Anytime	75	80	85	90	95

Source: Lake Elsinore Municipal Code, Chapter 17.176 Noise Control (2024).
Note: No person shall operate, or cause to be operated, any source of sound at any location within the incorporated city or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the noise level when measured on any other property, either incorporated or unincorporated, to exceed:
L_2 = The noise standard plus 15 dBA for a cumulative period of more than 1 minute in any hour.
L_8 = The noise standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour.
L_{25} = The noise standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour.
L_{50} = The noise standard for a cumulative period of more than 30 minutes in any hour.
L_{max} = The noise standard plus 20 dBA or the maximum measured ambient noise level for any period of time.
dBA = A-weighted decibels

Section 17.176.080[G] of the City's Municipal Code prohibits operating or permitting the operation of any device that creates a vibration that is above the vibration perception threshold of any individual at or beyond the property boundary of the source if on private property or at 150 feet from the source if on a public space or public ROW. Section 17.176.020 of the City's Municipal Code defines the vibration perception threshold to be a motion velocity of 0.01 RMS inches per second (in/sec) over the range of 1 to 100 hertz (Hz). An RMS of 0.01 in/sec is equivalent to a PPV level of 0.04 in/sec.

Table 3.13.F: Construction Noise Standards

Allowable Work (Dates and Times)	At Residential Properties						At Business Properties	
	Single-Family		Multifamily		Semi-Residential/ Commercial		Mobile Equipment[1]	Stationary Equipment[2]
	Mobile Equipment[1]	Stationary Equipment[2]	Mobile Equipment[1]	Stationary Equipment[2]	Mobile Equipment[1]	Stationary Equipment[2]		
Daily,[3] 7:00 a.m.–7:00 p.m.	75 dBA	60 dBA	80 dBA	65 dBA	85 dBA	70 dBA	--	--
Daily,[4] 7:00 p.m.–7:00 a.m.	60 dBA	50 dBA	65 dBA	55 dBA	70 dBA	60 dBA	--	--
Daily, Anytime	--	--	--	--	--	--	85 dBA	75 dBA

Source: City of Lake Elsinore Municipal Code (2024).
Note: Maximum noise levels were interpreted to be the equivalent continuous sound level (L_{eq}). The hours between 7:00 a.m. and 7:00 p.m. are referred to as daytime hours, and the hours between 7:00 p.m. and 7:00 a.m. are referred to as nighttime hours.
[1] Represents maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment.
[2] Represents maximum noise levels for repetitively scheduled and relatively long-term operation (periods of 10 days or more) of stationary equipment.
[3] Daily except for Sundays and legal holidays.
[4] Daily and all day on Sundays and legal holidays.
dBA = A-weighted decibels

City of Lake Elsinore Good Neighbor Policy. On April 25, 2023, the City of Lake Elsinore adopted the Good Neighbor Policy for Warehousing, Logistics, and Distribution Uses (Policy No. 400-16). The policy provides a framework for larger-scale warehousing, logistics and distribution projects to be designed and operated to mitigate negative impacts on sensitive receptors and the environment and to preserve and advance the City Council's vision as set forth in the City's General Plan and Dream Extreme 2040 Plan. The policy is meant to apply Best Management Practices (BMPs) to help minimize potential impacts to sensitive receptors and will be used in addition to applicable requirements of the City's Zoning Code and CEQA. In addition, the more restrictive operational noise standards outlined in Table 3.13.E state that at no time during normal business hours shall the noise generated from the adjacent industrial operation exceed 65 dBA as measured from the closest property line of a sensitive receptor.

3.13.6 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Thresholds of Significance.* Based on these thresholds, implementation of a project could have a significant adverse impact related to noise if it would:

Threshold 3.13.1: Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies,

Threshold 3.13.2: Generate excessive ground-borne vibration or ground-borne noise levels, or

Threshold 3.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels.

Noise Level Increases. Noise level increases resulting from the Project are evaluated based on the Appendix G CEQA Guidelines described above at the closest sensitive receiver locations. Under CEQA, consideration must be given to the magnitude of the increase, the existing baseline ambient noise levels, and the location of noise-sensitive receivers to determine if a noise increase represents a significant adverse environmental impact. This approach recognizes that there is no single noise increase that renders a noise impact significant.[27] This is primarily because of the wide variation in individual thresholds of annoyance and differing individual experiences with noise. Thus, an important way of determining a person's subjective reaction to a new noise is the comparison of it to the existing environment to which one has adapted—the so-called ambient environment. In general, the more a new noise level exceeds the previously existing ambient noise level, the less acceptable the new noise level will typically be judged.

Sensitive receivers are areas where humans are participating in activities that may be subject to the stress of significant interference from noise and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, and libraries. Other receivers include office and industrial buildings, which are not considered as sensitive as single-family homes but are still protected by the City of Lake Elsinore land use compatibility standards, as discussed below.[28]

Noise-Sensitive Receivers (Substantial Permanent Noise Level Increase). The Federal Interagency Committee on Noise (FICON)[29] developed guidance to be used for the assessment of project-generated increases in noise levels that consider the ambient noise level. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (L_{dn}) and the L_{eq}.

As previously stated, the approach used in the noise study prepared for the Project recognizes that there is no single noise increase that renders a noise impact significant, based on a 2008 California Court of Appeal ruling in *Gray v. County of Madera*.[30] For example, if the ambient noise environment is quiet (<60 dBA) and the new noise source greatly increases the noise levels, an impact may occur if the noise criteria may be exceeded. Therefore, for this analysis, a readily perceptible 5 dBA or greater project-related noise level increase may be considered a potentially significant impact on a case-by-case basis when the without-project noise levels are below 60

27 *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099.; 85 Cal.Rptr.3d 50.

28 Urban Crossroads, Inc. 2025. *Baker Lake Elsinore Noise and Vibration Analysis*. March 24.

29 Federal Interagency Committee on Noise. 1992. *Federal Agency Review of Selected Airport Noise Analysis Issues.* August.

30 *Gray v. County of Madera* (2008) 167 Cal.App.4th 1099; 85 Cal.Rptr.3d 50, disapproved on other grounds *by Center for Biological Diversity v. County of San Bernardino* (2010) 185 Cal.App.4th 866, 111 Cal.Rptr.3d 374.

dBA. Per the FICON, in areas where the without-project noise levels range from 60 to 65 dBA, an increase of 3 dBA or less is considered a barely perceptible noise level increase for most people and is not considered potentially significant. When the without-project noise levels already exceed 65 dBA, any increase in community noise louder than 1.5 dBA is considered a potentially significant impact if the noise criteria for a given land use is exceeded, since it likely contributes to an existing noise exposure exceedance.

The FICON guidance provides an established source of criteria to assess the impacts of substantial temporary or permanent increase in baseline ambient noise levels. Based on the FICON criteria, the amount to which a given noise level increase is considered acceptable is reduced when the without-project (baseline) noise levels are already shown to exceed certain land-use specific exterior noise level criteria. The specific levels are based on typical responses to noise level increases of 5 dBA (or readily perceptible), 3 dBA (or barely perceptible), and 1.5 dBA depending on the underlying without-project noise levels for noise-sensitive uses. These levels of increases and their perceived acceptance at noise sensitive receiver locations are consistent with guidance provided by both the FHWA[31] and the California Department of Transportation (Caltrans).[32] An off-site traffic or operational noise increase exceeding the FICON criteria at noise-sensitive receiver locations is considered a substantial noise increase representing a potentially significant noise impact.

Non-Noise-Sensitive Receivers (Substantial Permanent Noise Level Increase). The City of Lake Elsinore General Plan Noise Element, Noise and Land Use Compatibility Matrix was used to establish the satisfactory noise levels of significance for non-noise-sensitive land uses in the vicinity of the Project site. As previously shown in Table 3.13.C, the normally compatible exterior noise level for non-noise-sensitive commercial/industrial land uses is 75 dBA CNEL. To determine if Project-related traffic noise increases are significant at off-site non-noise-sensitive land uses, a barely perceptible 3 dBA criteria is used. When the without-Project noise levels are greater than the completely compatible 75 dBA CNEL land use compatibility criteria, a barely perceptible 3 dBA or greater noise level increase is considered a potentially significant impact since the noise level criteria is already exceeded. The noise level increases used to determine significant impacts for non-noise-sensitive land uses is generally consistent with the FICON noise level increase thresholds for noise-sensitive land uses but is based on the City of Lake Elsinore General Plan, Noise and Land Use Compatibility Matrix, normally compatible 75 dBA CNEL exterior noise level criteria.

Construction Noise (Substantial Temporary Noise Increase). To control the noise-generating construction activities, the temporary noise level increases over the existing ambient conditions must be considered under CEQA. Therefore, the 12 dBA L_{eq} substantial noise level increase threshold provided by the Caltrans Traffic Noise Analysis Protocol is used in this analysis to assess

[31] United States Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. 2011. *Highway Traffic Noise Analysis and Abatement Policy and Guidance.* December.

[32] California Department of Transportation. 2013. *Technical Supplement to the Traffic Noise Analysis Protocol.* September.

temporary noise level increases.[33] In California, a substantial noise increase is considered to occur when a project's predicted noise level exceeds the existing noise level by 12 dBA or more. The use of 12 dBA was established in California many years ago and is based on the concept that a 10 dB increase generally is perceived as a doubling of loudness.[34] Therefore, if the project-related construction noise levels generate a temporary noise level increase above the existing ambient noise levels of up to 12 dBA L_{eq}, then the project construction noise level increases will be considered a potentially significant impact.

Vibration. Vibration levels generated from the Project are evaluated using a PPV level of 0.04 in/sec based on Section 17.176.080[G] of the City's Municipal Code.

3.13.7 Project Impacts

Threshold 3.13.1: Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

3.13.7.1 Short-Term Construction Noise Impacts

Less than Significant. The FTA *Transit Noise and Vibration Impact Assessment Manual*[35] recognizes that construction projects are accomplished in several different stages and outlines the procedures for assessing noise impacts during construction. Each stage has a specific equipment mix, depending on the work to be completed during that stage. As a result of the equipment mix, each stage has its own noise characteristics; some stages have higher continuous noise levels than others, and some have higher impact noise levels than others. The Project construction activities would include the following construction phases: site preparation, grading, building construction, paving, and architectural coating.

This construction noise analysis was prepared using reference construction equipment noise levels from the FHWA published the Roadway Construction Noise Model (RCNM), which includes a national database of construction equipment reference noise emission levels.[36] The RCNM equipment database provides a comprehensive list of the noise-generating characteristics for specific types of construction equipment. In addition, the database provides an acoustical usage factor to estimate the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition) during Project construction activities.

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33 California Department of Transportation. 2020. *Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects.* April.

34 California Department of Transportation. 2013. *Technical Supplement to the Traffic Noise Analysis Protocol.* September.

35 Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual.* September.

36 United States Department of Transportation, Federal Highway Administration, Office of Environment and Planning. 2006. FHWA Roadway Construction Noise Model. January.

Using the reference construction equipment noise levels, the Noise and Vibration Analysis (Appendix L) modeled mobile and stationary Project construction noise levels at the nearby sensitive receiver locations. Even though CEQA does not require analysis of a worst-case scenario, consistent with FTA guidance[37] for general construction noise assessment, Table 3.13.G shows the combined noise levels for the noisiest pieces of construction equipment expected to be used in each phase, assuming all equipment operates at the same time.

Table 3.13.G: Construction Reference Noise Levels

Construction Phase	Construction Equipment[1]	Reference Noise Level at 50 ft (dBA L_{eq})	Composite Reference Noise Level[2] (dBA L_{eq})	Reference Sound Power Level (dBA Lw)[3]
Site Preparation	Tractor	80	84.0	115.6
	Backhoe	74		
	Grader	81		
Grading	Scraper	80	83.3	114.9
	Excavator	77		
	Dozer	78		
Building Construction	Crane	73	80.6	112.2
	Generator	78		
	Front End Loader	75		
Paving	Paver	74	77.8	109.5
	Dump Truck	72		
	Roller	73		
Architectural Coating	Man Lift	68	76.2	107.8
	Compressor (air)	74		
	Generator (25 kVA)	70		

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] FHWA Road Construction Noise Model.
[2] Represents the combined noise level for all equipment assuming it operates at the same time consistent with FTA Transit Noise and Vibration Impact Assessment guidance.
[3] L_w represents the total amount of acoustical energy (noise level) produced by a sound source independent of distance or surroundings.
dBA = A-weighted decibels
L_w = sound power level
L_{eq} = equivalent continuous sound level

Mobile Construction Noise Levels. It is assumed that Project construction would generally be limited to between the hours of 7:00 a.m. and 7:00 p.m., consistent with City of Lake Elsinore Municipal Code Section 17.176.080[F]. The construction noise modeling completed for the Project (Appendix L) evaluates the equipment as multiple moving point sources or work crews within the construction boundary to account for the dynamic nature of mobile construction activities. Construction projects involve various stages, and activities frequently shift from one location to another. For example, during the initial stages, noise-generating activities might concentrate in one area and then move to another section as construction progresses. Construction impacts are based on the highest noise level calculated at each receiver location. The mobile construction noise model calculations are provided in Appendix L of this EIR. As shown on Table 3.13.H, the peak mobile construction noise levels are expected to range from 50.0 to 61.3 dBA L_{eq} at the nearby receiver locations. These noise levels would

[37] Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual.* September.

not exceed the City's mobile construction noise standard of 75 dBA L_{eq}. Therefore, noise generated from Project mobile construction activities would be **less than significant** at all receiver locations. Mitigation is not required.

Table 3.13.H: Mobile Construction Noise Level Summary

Receiver No.[1]	Noise Level (dBA L_{eq})							Threshold Exceeded?[4]
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Level[2]	Threshold[3]	
R1	61.3	60.6	57.9	55.2	53.5	61.3	75	No
R2	54.1	53.4	50.7	48.0	46.3	54.1	75	No
R3	52.3	51.6	48.9	46.2	44.5	52.3	75	No
R4	52.3	51.6	48.9	46.2	44.5	52.3	75	No
R5	50.0	49.3	46.6	43.9	42.2	50.0	75	No
R6	60.9	60.2	57.5	54.8	53.1	60.9	75	No

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] Receiver locations are shown on Figure 3.13-1.
[2] Highest mobile construction noise level.
[3] Mobile construction noise level threshold shown in Table 3.13.F.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level
ft = feet/foot

Stationary Source Construction Noise Levels. Stationary noise sources generally concentrate in one place near the building during the building construction and architectural coating phases of construction, and they include equipment such as generators, compressors, and tower cranes. Table 3.13.I shows the stationary construction noise levels at the nearby receiver locations for each construction phase. The stationary construction noise model calculations are provided in Appendix L of this EIR. As shown in Table 3.13.I, peak stationary construction noise levels are expected to range from 41.9 to 57.5 dBA L_{eq} at nearby receiver locations. These noise levels would not exceed the City's daytime stationary construction standard of 60 dBA L_{eq}. Therefore, impacts from stationary construction noise are **less than significant** at all receiver locations. Mitigation is not required.

Table 3.13.I: Stationary Construction Noise Level Summary

Receiver No.[1]	Noise Level (dBA L_{eq})							Threshold Exceeded?[4]
	Site Preparation	Grading	Building Construction	Paving	Architectural Coating	Highest Levels[2]	Threshold[3]	
R1	--	--	57.5	--	53.1	57.5	60	No
R2	--	--	47.8	--	43.4	47.8	60	No
R3	--	--	46.4	--	42.0	46.4	60	No
R4	--	--	45.5	--	41.1	45.5	60	No
R5	--	--	41.9	--	37.5	41.9	60	No
R6	--	--	51.5	--	47.1	51.5	60	No

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] Receiver locations are shown on Figure 3.13-1.
[2] Highest stationary construction noise level.
[3] Stationary construction noise level threshold shown in Table 3.13.F.
[4] Do the estimated Project construction noise levels exceed the construction noise level threshold?
dBA = A-weighted decibels
ft = feet/foot
L_{eq} = equivalent continuous sound level

Combined Construction Noise Levels. Project construction noise levels were combined with the measured ambient noise levels at the nearest off-site receiver locations to determine temporary Project construction noise contributions to the existing ambient noise environment. The difference between the combined Project construction and ambient noise levels is used to describe the construction noise level contributions. Table 3.13.J shows the mobile and stationary noise increases that would be experienced at sensitive receiver locations when Project construction-source noise is added to the ambient daytime conditions. A temporary noise level increase of 12 dBA is considered a potentially significant impact based on the Caltrans substantial noise level increase criteria,[38] which is used to assess the Project construction noise level increases. As shown in Table 3.13.J, noise generated from mobile construction activities would increase ambient noise levels ranging from 1.0 to 9.4 dBA, while noise generated from stationary construction activities would increase ambient noise levels ranging from 0.2 to 6.3 dBA during the daytime hours at the nearest receiver locations. This ambient noise level increase would not exceed the Caltrans substantial noise increase threshold of 12 dBA during project mobile and stationary construction activities. Therefore, temporary ambient noise level increases from Project mobile and stationary construction activities would be **less than significant** at all receiver locations. Mitigation is not required.

[38] California Department of Transportation. 2020. *Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects.* April.

Table 3.13.J: Mobile Construction Noise Level Increase

Receiver No.[1]	Mobile/Stationary Construction Noise Level (dBA L_{eq})	Measurement No.[2]	Daytime Ambient Noise Level[3] (dBA L_{eq})	Combined Mobile/Stationary Noise Levels[4] (dBA L_{eq})	Project Mobile/Stationary Noise Increase[5] (dBA)	Increase Criteria[6] (dBA)	Increase Criteria Exceeded?
R1	61.3/57.5	L1	52.4	61.8/58.7	9.4/6.3	12	No
R2	54.1/47.8	L2	54.9	57.5/55.7	2.6/0.8	12	No
R3	52.3/46.4	L3	51.7	55.0/52.8	3.3/1.1	12	No
R4	52.3/45.5	L4	57.7	58.8/58.0	1.1/0.3	12	No
R5	50.0/41.9	L5	55.9	56.9/56.1	1.0/0.2	12	No
R6	60.9/51.5	L6	52.0	61.4/54.8	9.4/2.8	12	No

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] Receiver locations are shown on Figure 3.13-1.
[2] Ambient noise measurement locations are shown on Figure 3.13-2.
[3] Average daytime ambient noise levels shown in Table 3.13.A.
[4] Represents the combined ambient conditions plus Project construction activities.
[5] The noise level increase with the addition of Project mobile construction activities.
[6] Caltrans Traffic Noise Analysis Protocol (April 2020).
Caltrans = California Department of Transportation
dBA = A-weighted decibels
ft = feet/foot
L_{eq} = equivalent continuous sound level

Off-Site Roadway and Lift Station Construction Noise Levels. Off-site roadway improvements would include limited improvements to Baker Street and Nichols Street, realignment of Baker Street to Nichols Street, and improvements from Pierce Street to Hoff Avenue southwest of the Project site to support the proposed Project and other nearby projects. Improvements to the temporary lift station at the intersection of Pierce Street and Nichols Street would include the following:

- Installation of three pumps (two duty and one standby), each rated for 1,100 gallons per minute with 25-horsepower motors
- Construction of an above-grade control building
- A standby diesel generator to be rated for 200 kW
- New electrical service to the site and on-site electrical and building electrical improvements
- Site improvements, including an 8-foot-high perimeter block wall and paving inside the site

Additionally, installation of approximately 7,650 feet of 16-inch force main is anticipated at Nichols Road and Collier Avenue to a discharge manhole at the intersection of Collier Avenue and Riverside Drive. Construction of the off-site roadway and utility improvements will be primarily within the existing public ROW and would be brief in duration. The physical ROW constraints would limit the amount of construction equipment that could be used at any one location, and any off-site roadway and utility infrastructure construction would not take place at any one location for more than a few days due to the nature of the linear construction activity. Therefore, construction noise from off-site

improvements would be relatively short-term, and the noise levels at any one location would be reduced as construction work moves linearly along with the selected alignment.

Table 3.13.K shows the off-site Project construction noise levels at distances ranging from 10 feet to 100 feet using the highest reference noise levels shown in Table 3.13.G. At distances ranging from 10 to 100 feet, noise generated from off-site mobile construction activities would range from 59.8 to 65.7 dBA L_{eq}. The off-site mobile construction noise model calculations are provided in Appendix L of this EIR. These noise levels would not exceed the City's mobile construction noise standard of 75 dBA L_{eq}. Therefore, noise generated from Project construction activities associated with off-site improvements would be **less than significant** at all receiver locations. Mitigation is not required.

Table 3.13.K: Off-Site Construction Noise Levels

Distance from Construction (ft)	Noise Level (dBA L_{eq})		Threshold Exceeded?[3]
	Construction Noise Level[1]	Threshold[2]	
10	65.7	75	No
20	64.3	75	No
50	61.8	75	No
100	59.8	75	No

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis,* (March 24, 2025).
[1] Based on the highest combined reference construction noise levels shown in Table 3.13.G.
[2] Mobile construction noise level threshold shown in Table 3.13.F.
[3] Do the estimated Project construction noise levels exceed the construction noise level threshold?
dBA = A-weighted decibels
ft = feet/foot
L_{eq} = equivalent continuous sound level

Nighttime Concrete Pour Reference Noise Level Measurement. Urban Crossroads conducted reference noise level measurements during a nighttime concrete pouring at a construction site (27334 San Bernardino Avenue in Redlands, California) between 1:00 and 2:00 a.m. to estimate the noise levels from nighttime concrete pouring activities. The reference noise levels describe the expected concrete pour noise sources that may include concrete mixer truck movements and pouring activities, concrete paving equipment, rear-mounted concrete mixer truck backup alarms, engine idling, air brakes, generators, and workers communicating/whistling. The reference sound pressure level of 67.7 dBA L_{eq} at 50 feet representing a sound power level of 100.3 dBA L_w was used to analyze the nighttime concrete pour noise levels associated with the proposed Project even though Project noise levels will depend on the actual duration of activities and the specific equipment fleet in use at the time of construction given the similarity of the expected activities.

Due to timing of construction activities and daily temperatures, the Project may include onsite nighttime concrete pouring activities. Table 3.13.L shows the noise levels associated with the nighttime concrete pour activities at each receiver location. As shown in Table 3.13.L, nighttime concrete pouring activities are estimated to range from 37.0 to 52.6 dBA L_{eq} at receiver locations. The nighttime concrete pour noise model calculations are provided in Appendix L of this EIR. These noise levels would not exceed the City's nighttime mobile construction noise standard of 60 dBA L_{eq} for noise sensitive receiver locations. Therefore, noise generated from nighttime concrete pour with prior

City authorization for nighttime work would be **less than significant** at all receiver locations. Mitigation is not required.

Table 3.13.L: Nighttime Concrete Pour Noise Levels

Receiver No.[1]	Concrete Pour Noise Level (dBA L_{eq})		
	Exterior Noise Level	Threshold[2]	Threshold Exceeded?[3]
R1	52.6	60	No
R2	42.9	60	No
R3	41.5	60	No
R4	40.6	60	No
R5	37.0	60	No
R6	46.6	60	No

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] Receiver locations are shown on Figure 3.13-1.
[2] Mobile construction noise level threshold shown in Table 3.13.G.
[3] Do the estimated Project construction noise levels exceed the construction noise level threshold?
dBA = A-weighted decibels L_{eq} = equivalent continuous sound level
ft = feet/foot

Compliance with **Regulatory Compliance Measure (RCM) N-1** pursuant to Section 17.176.080[F] of the City's Municipal Code, provided below, would ensure construction-related noise would be minimized during the more sensitive nighttime hours.

3.13.7.2 Long-Term Stationary Noise Impacts

Less than Significant. This operational noise analysis is intended to describe noise level impacts associated with the expected typical daytime and nighttime activities at the Project site. Although not required by CEQA, to present the potential worst-case noise conditions, this analysis assumes the Project would be operational 24 hours per day, 7 days per week, as future tenants are currently unknown. Consistent with similar warehouse and industrial uses, the Project's business operations would primarily be conducted within the enclosed buildings, except for traffic movement, parking, and loading and unloading of trucks at designated loading bays. The on-site Project-related noise sources are expected to include loading dock activity, tractor trailer storage activity, parking lot vehicle activities, rooftop air-conditioning units, trash enclosure activity, and truck movements.

Reference Noise Levels. The reference noise level measurements shown in Table 3.13.M were collected from similar types of operational activities with comparable scales and schedules, and were used to estimate Project operational noise levels. It is important to note that although not required by CEQA, the following projected noise levels provide a conservative analysis and assume the worst-case noise environment with the loading dock activity, tractor-trailer storage activity, parking lot vehicle activities, rooftop air-conditioning units, trash enclosure activity, and truck movements all operating at the same time. As shown on Table 3.13.M, typical noise from on-site activities would range from 52.6 to 65.7 dBA L_{eq} at 50 feet.

Table 3.13.M: Reference Noise Level Measurements

Noise Source	Noise Source Height (ft)	Minute/Hour[1]		Reference Noise Level (dBA L_{eq}) at 50 ft	Sound Power Level (dBA)[2]
		Daytime	Nighttime		
Loading Dock Activity	8	60	60	65.7	111.5
Tractor Trailer Storage Activity	8	60	60	62.8	103.4
Roof-Top Air Conditioning Units	5	39	28	57.2	88.9
Parking Lot Vehicle Movements	5	60	60	52.6	81.1
Trash Enclosure Activity	5	60	30	57.3	89.0
Truck Movements	8	60	60	59.8	93.2

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).

[1] Anticipated duration (minutes within the hour) of noise activity during typical hourly conditions expected at the Project site.

[2] Daytime hours are from 7:00 a.m. to 10:00 p.m.

[3] Nighttime hours are from 10:00 p.m. to 7:00 a.m.

[4] Sound power level represents the total amount of acoustic energy (noise level) produced by a sound source independent of distance or surroundings. Sound power levels were calculated using the CadnaA noise model at the reference distance to the noise source. Numbers may vary due to size differences between point and area noise sources.

dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level
ft = feet/foot

Loading Dock Activity. The reference loading dock activities are intended to describe the typical outdoor operational noise activities associated with the Project. These include truck idling, reefer activity (refrigerator truck/cold storage), deliveries, backup alarms, trailer docking (including a combination of tractor-trailer semi-trucks), two-axle delivery trucks, and background operation activities. Since the noise levels generated by cold-storage loading dock activity can be slightly higher due to the use of refrigerated trucks or reefers, this reference noise level conservatively assumes that all loading dock activity is associated with cold-storage facilities. The reference noise level measurement was taken in the center of the loading dock activity area and represents multiple concurrent noise sources, resulting in a combined noise level of 65.7 dBA L_{eq} at a uniform distance of 50 feet. Specifically, the reference noise level measurement represents one truck located approximately 30 feet from the noise level meter, with another truck passing by to park roughly 20 feet away, both with their engines idling. Throughout the reference noise level measurement, a separate docked and running reefer truck was located approximately 50 feet east of the measurement location. Additional background noise sources included truck pass-by noise, truck drivers talking to each other next to docked trucks, backup alarms, and air brake release noise when trucks are parked.

Tractor-Trailer Storage Activity. To evaluate the noise levels associated with truck idling, backup alarms, tractor-trailer movements, and storage activities under Project tractor-trailer storage activities, reference noise level measurements were collected at an existing parcel hub facility that is similar in scale and activity types to the Project. The measured reference noise level of tractor-trailer storage activities was 62.8 dBA L_{eq} at 50 feet. The reference noise level measurement included a semi-truck with trailer pass-by event, background switcher cab trailer towing, drop-off, idling, and backup alarm events. Tractor-trailer activity is estimated during all the daytime, evening, and nighttime hours.

Rooftop Air-Conditioning Units. The noise level measurements assume a total of eight rooftop air-conditioning units throughout the two proposed warehouse buildings in the Onsite Development Area. The reference noise level for these units is a Lennox SCA120 series 10-ton model packaged air-conditioning unit. At the uniform reference distance of 50 feet, the reference noise level is 57.2 dBA L_{eq}. Based on the typical operating conditions observed over a 4-day measurement period, the rooftop air-conditioning units are estimated to operate for an average 39 minutes per hour during the daytime hours and 28 minutes per hour during the nighttime hours. These operating conditions reflect peak summer cooling requirements, with measured temperatures approaching 96 degrees Fahrenheit (°F) and average daytime temperatures of 82°F. For this noise analysis, the air-conditioning units are expected to be located on the roofs of the proposed warehouse buildings.

Parking Lot Vehicle Movements. A long-term 29-hour reference noise level measurement was collected in the center of activity within the staff parking lot of a warehouse distribution center to assess on-site parking lot activity. The parking lot generated a reference noise level of 52.6 dBA L_{eq} at 50 feet from the center of activity. Parking activities are expected to take place during the full hour (60 minutes) throughout the daytime and evening hours. The parking lot noise levels are mainly due to cars pulling in and out of parking spaces in combination with car doors opening and closing.

Trash Enclosure Activity. Urban Crossroads collected a reference noise level measurement at an existing trash enclosure containing two dumpster bins to analyze noise associated with trash enclosure activities. The noise generated from trash enclosure activities includes metal gates opening and closing, metal scraping against concrete floor sounds, dumpster movement on metal wheels, and trash dropping into the metal dumpster. The reference noise levels describe trash enclosure noise activities when trash is dropped into an empty metal dumpster, as would occur at the Project site. The measured reference noise level at the uniform 50-foot reference distance is 57.3 dBA L_{eq} for the trash enclosure activity. The reference noise level describes the expected noise source activities associated with the trash enclosures for the Project's proposed buildings.

Truck Movements. The truck movements reference noise level measurement was collected over a period of 1 hour and 28 minutes and represents multiple heavy trucks entering and exiting the outdoor loading dock area, producing a reference noise level of 59.8 dBA L_{eq} at 50 feet. The noise sources included at this measurement location account for trucks entering and exiting the Project driveways and maneuvering in and out of the outdoor loading dock activity area.

Project Operational Noise Levels. The operational source noise levels generated from the Project and Project-related noise level increases that would be experienced at each of the sensitive receiver locations were modeled by the *Noise and Vibration Analysis* (Appendix L). As shown in Table 3.13.N, the daytime hourly noise levels are expected to range from 42.1 to 54.3 dBA L_{eq}, while the nighttime hourly noise levels are expected to range from 42.1 to 54.3 dBA L_{eq} at nearby sensitive receiver locations. These daytime and nighttime operational noise levels would not exceed the City's exterior daytime and nighttime stationary noise standards, adjusted in 5 dBA increments to reflect the ambient noise levels (see Table 3.13.E) based on Section 17.176.060[A][3] of the City's Municipal Code. Therefore, stationary noise generated from Project operations would be **less than significant.** Mitigation is not required.

Table 3.13.N: Project Operational Noise Level

Noise Sources	Operational Noise Levels by Receiver Location (dBA L_{eq})[1]					
	R1	R2	R3	R4	R5	R6
Cold Storage Loading Dock Activity	31.6/31.6	30.3/30.3	42.1/42.1	39.5/39.5	34.1/34.1	49.1/49.1
Tractor-Trailer Storage Activity	39.2/39.2	42.2/42.2	41.4/41.4	42.2/42.2	43.1/41.1	52.0/52.0
Rooftop Air-Conditioning Units	36.1/33.7	26.4/24.0	24.1/21.7	22.2/19.8	20.2/17.8	33.8/31.3
Parking Lot Vehicle Movements	35.6/35.6	22.7/22.7	18.5/18.5	19.4/19.4	17.1/17.1	31.8/31.8
Trash Enclosure Activity	14.6/13.6	23.9/22.9	21.5/20.5	14.6/13.7	12.9/12.0	34.6/33.7
Truck Movements	26.2/26.2	28.1/28.1	29.2/29.2	30.4/30.4	28.7/28.7	43.3/43.3
Total (All Noise Sources) – Daytime/Nighttime	**42.5/42.1**	**42.8/42.8**	**45.0/44.9**	**44.3/44.3**	**42.1/42.1**	**54.3/54.3**
Daytime/Nighttime Noise Level Standard	**50/55**	**55/50**	**55/45**	**60/55**	**60/55**	**55/55**
Exceed?	**No/No**	**No/No**	**No/No**	**No/No**	**No/No**	**No/No**

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] Daytime/nighttime noise levels.
dBA = A-weighted decibels
L_{eq} = equivalent continuous sound level
ft = feet/foot

3.13.7.3 Long-Term Traffic Noise Impacts

Less than Significant. The expected vehicular traffic noise level increases were calculated in the Noise and Vibration Analysis using a computer program that replicates the FHWA Traffic Noise Prediction Model FHWA-RD-77-108.[39] This methodology is commonly used to describe off-site traffic noise levels throughout southern California and is appropriate to use here. The FHWA Model arrives at a predicted noise level through a series of adjustments to the Reference Energy Mean Emission Level (REMEL) by vehicle type. REMEL represents the maximum sound level (L_{max}) of individual vehicle "pass by" events by vehicle type when measured at a "reference distance" of 50 feet from the center of the travel lane.

Tables 3.13.O and 3.13.P summarize the expected existing and opening year (2027) traffic noise level under the without and with Project conditions, respectively, for each roadway segment at the receiving noise-sensitive land use. It should be noted that the existing with Project condition is provided solely for informational purposes and would not occur because the Project would not be fully developed and occupied under existing conditions. To be conservative, these noise levels assume no noise attenuation from features such as noise barriers or topography.

[39] United States Department of Transportation, Federal Highway Administration. 1978. FHWA Highway Traffic Noise Prediction Model. December. FHWA-RD-77-108.

Table 3.13.O: Existing Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL at Receiving Land Use (dBA)	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL at Receiving Land Use (dBA)	Increase from Baseline Conditions (dBA)
Nichols Road between Terra Cotta and Baker Street	10,709	52	112	242	70.3	11,067	59	127	273	71.1	0.8
Nichols Road between Baker Street and Collier Avenue	10,539	52	111	240	70.2	12,447	83	180	387	73.3	3.1
Nichols Road between Collier Avenue and I-15 SB Ramps	10,545	52	111	240	70.2	12,214	80	172	371	73.1	2.9
Nichols Road between I-15 SB Ramps and I-15 NB Ramps	10,056	50	108	232	70.0	11,010	67	145	311	71.9	1.9

Source: Urban Crossroads, Inc. *Baker Lake Elsinore Noise and Vibration Analysis*. March 24, 2025.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels
ft = foot/feet
I- = Interstate
NB = northbound
SB = southbound

Table 3.13.P: Opening Year (2027) Traffic Noise Levels Without and With Project

Roadway Segment	Without Project Traffic Conditions					With Project Traffic Conditions					
	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL at Receiving Land Use (dBA)	ADT	Centerline to 70 dBA CNEL (ft)	Centerline to 65 dBA CNEL (ft)	Centerline to 60 dBA CNEL (ft)	CNEL at Receiving Land Use (dBA)	Increase from Baseline Conditions (dBA)
Nichols Road between Terra Cotta and Baker Street	12,583	58	125	270	71.0	12,940	64	139	299	71.6	0.8
Nichols Road between Baker Street and Collier Avenue	12,402	58	124	267	70.9	14,310	88	190	409	73.7	3.1
Nichols Road between Collier Avenue and I-15 SB Ramps	12,318	57	123	266	70.9	13,987	84	182	392	73.4	2.9
Nichols Road between I-15 SB Ramps and I-15 NB Ramps	11,799	56	120	258	70.7	12,753	72	155	334	72.4	1.9

Source: Urban Crossroads, Inc. *Baker Lake Elsinore Noise and Vibration Analysis*. March 24, 2025.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
ft = foot/feet
I- = Interstate
NB = northbound
SB = southbound

As shown in Table 3.13.O, existing traffic noise levels with Project conditions are expected to range from 71.1 to 73.3 dBA CNEL at the receiving off-site land use and the traffic noise increase is expected to range from 0.8 to 3.1 dBA. Also, Table 3.13.P shows that the opening year (2027) traffic noise levels with Project conditions are expected to range from 71.6 to 73.7 dBA CNEL at the receiving off-site land use and the traffic noise increase is expected to range from 0.6 to 2.8 dBA. The Project-related traffic noise increase would be potentially significant because the Project would exceed the ambient noise level increase of 1.5 dBA when traffic noise levels are greater than 65 dBA CNEL. However, there are no noise-sensitive uses along Nichols Road between I-15 and Terra Cotta. Therefore, Project-related traffic noise would be **less than significant.** Mitigation is not required.

Threshold 3.13.2: Would the project generate excessive ground-borne vibration or ground-borne noise levels?

3.13.7.4 Short-Term Construction Vibration Impacts

Less than Significant. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. The operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Table 3.13.Q lists the ground vibration levels associated with each type of construction equipment. The reference vibration levels for the various construction equipment and FTA vibration assessment methods were used to determine the potential for human response (annoyance) and building damage. The FTA provides the following equation to analyze vibration impacts: $PPV_{equip} = PPV_{ref} \times (25/D)^{1.5}$

Table 3.13.Q: Vibration Source Levels for Construction Equipment

Equipment	Reference Vibration Level PPV (in/sec) at 25 Feet
Small bulldozer	0.003
Jackhammer	0.035
Loaded Trucks	0.076
Large bulldozer	0.089
Vibratory Roller	0.210

Source: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual* (September 2018).
ft = foot/feet
in/sec = inches per second
PPV = peak particle velocity

Table 3.13.R shows the expected vibration levels generated from Project construction activities at nearby building structures from use of the highest vibrating equipment. At Receivers R1 through R6, which are at distances ranging from 92 to 1,551 feet from the Project construction boundary, construction vibration levels are estimated to range from 0.000 to 0.030 PPV (in/sec). These vibration levels would not exceed the City's vibration perception threshold of 0.04 PPV (in/sec). Therefore, vibration levels generated from Project construction activities would be **less than significant.** Mitigation is not required.

Table 3.13.R: Project Construction Vibration Levels

Location	Distance[2] (ft)	Vibration Levels PPV (in/sec)							Exceed Threshold?
		Small Bulldozer	Jackhammer	Loaded Trucks	Large Bulldozer	Vibratory Roller	Highest Vibration Level	Threshold	
R1	92	0.000	0.005	0.011	0.013	0.030	0.030	0.04	No
R2	220	0.000	0.001	0.003	0.003	0.008	0.008	0.04	No
R3	1,551	0.000	0.000	0.000	0.000	0.000	0.000	0.04	No
R4	1,380	0.000	0.000	0.000	0.000	0.001	0.001	0.04	No
R5	1,393	0.000	0.000	0.000	0.000	0.001	0.001	0.04	No
R6	106	0.000	0.004	0.009	0.010	0.024	0.024	0.04	No

Source: Urban Crossroads, Inc., *Baker Lake Elsinore Noise and Vibration Analysis* (March 24, 2025).
[1] Receiver locations are shown on Figure 3.13-1.
[2] Distance from the building façade to the Project construction boundary (Project site boundary).
[3] Based on the vibration source levels of construction equipment (Table 3.13.Q).
[4] City of Lake Elsinore Municipal Code, Section 17.176.080[G].
[5] Does the peak vibration level exceed the acceptable vibration thresholds?
ft = foot/feet
in/sec = inches per second
PPV = peak particle velocity

3.13.7.5 Long-Term Operational Vibration Impacts

Less than Significant. Once operational, the proposed Project would not generate vibration. In addition, vibration levels generated from Project-related traffic on the adjacent roadways (i.e., Nichols Road and other roadways) would be unusual for on-road vehicles because the rubber tires and suspension systems of on road vehicles provide vibration isolation. Therefore, vibration levels generated from Project-related operations would be **less than significant.** Mitigation is not required.

Threshold 3.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?

Less than Significant. The Project site is not located within 2 miles of a public airport or within an airport land use plan. The nearest public airport is the privately operated Skylark Field Airport, supporting skydiving operations located over 5 miles southeast of the Project site on Cereal Street just west of Corydon Road. As such, the proposed Project would not expose people working in the Project area to excessive noise levels from airport operations. Therefore, noise impacts from airport operations would be **less than significant.** Mitigation is not required.

3.13.8 Level of Significance Prior to Mitigation

Noise and vibration levels generated from Project construction activities and operations of the Project would be **less than significant.**

3.13.9 Regulatory Compliance Measures and Mitigation Measures

3.13.9.1 Compliance Measures

The following RCM is applicable to the proposed Project.

RCM N-1 Pursuant to Municipal Code Section 17.176.080[F], the construction contractor shall limit construction activities to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays. No construction shall take place outside of these hours, anytime on weekends, or on holidays. The construction contractor shall ensure all mobile or stationary internal combustion engine powered equipment or machinery shall be equipped with suitable exhaust and air intake silencers in proper working order. In addition, the construction contractor shall obtain prior authorization from the City for nighttime concrete pouring activities.

3.13.10 Level of Significance after Mitigation

With the implementation of **RCM N-1**, noise and vibration levels generated from Project construction activities and operations of the Project would remain **less than significant.** Mitigation is not required.

3.13.11 Cumulative Impacts

Due to the attenuating characteristics of noise and vibration with distance, cumulative noise and vibration impacts are evaluated on the Project site and immediately adjacent areas. Past projects, along with reasonably foreseeable and approved projects in proximity to the Project site generally would not result in cumulative noise and vibration effects when evaluated in conjunction with the proposed Project due to their distance from the Project site. Refer to Table 3.A, Cumulative Project List, in Section 3.0, of this Draft EIR for a list of the cumulative projects in the vicinity of the project site.

Construction of the proposed warehouse and off-site roadway and utility infrastructure improvements would include demolition, site preparation, grading, building construction, on-site paving, and architectural coating phases of construction on the Project site. Noise generated from Project construction was evaluated against the City's mobile and stationary construction noise standards, and the ambient noise level increase was evaluated against the Caltrans substantial noise increase of 12 dBA in Section 3.13.7.1, above. In addition, vibration generated from Project construction was evaluated against the City's vibration perception threshold in Section 3.13.7.4. As listed in Table 3.A in Section 3.0 of this Draft EIR, there are eight existing, approved, or pending cumulative development projects in the vicinity of the Project site.[40] Of the eight cumulative projects, the Terracina Single-Family project is the closest to the Project site and is currently under development, with residential lots located within 500 feet of the nearest proposed Offsite Improvement Area (Pierce Street at Hoff Road) already constructed. Therefore, it is not expected that proximal cumulative projects would be developed at the same time as the proposed Project to generate noise that could combine to create cumulative noise impacts. The nearest cumulative

[40] EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

projects to the Onsite Development Area are the Terracina Residential Development and the Nicholas Ranch Residential Development, located approximately 800 feet southwest and 2,400 feet northeast from the Onsite Development Area, respectively. Refer to Figure 3-1 in Section 3.0 of this Draft EIR for the locations of these cumulative projects in relation to the project site. In the unlikely event the proposed Project and nearby cumulative projects are developed at the same time, construction noise and vibration in the Project vicinity would **not be cumulatively considerable** with adherence to the City's daytime and nighttime construction noise standards, pursuant to Section 17.176.080[F] of the City's Municipal Code, and the City's construction vibration standard, pursuant to Section 17.176.080[G] of the City's Municipal Code.

Noise levels generated from operations at the Project site would be typical of those experienced in similar industrial and commercial development and would include noise resulting from loading dock activity, tractor-trailer storage activity, rooftop air-conditioning units, parking lot vehicle movements, trash enclosure activity, and truck movements. As discussed in Section 3.13.7, above, noise and vibration levels generated from Project construction activities and operations of the Project would be less than significant under applicable thresholds. It is unlikely that activities on adjacent properties would generate noise that would combine with noises from the Project site to be additive in nature for two reasons. First, the noise sources would have to be adjacent or in close proximity to one another in order for noise to intermingle. Second, the sensitive receptor or receptors also would have to be adjacent or in close proximity to the noise generators. As discussed above, there are eight reasonably foreseeable and approved cumulative projects in the vicinity of the Project site. It is not possible, nor is it appropriate, to predict with reasonable certainty if cumulative development in the Project vicinity would generate noise at the same time and location(s) sufficient to create significant cumulative noise impacts at sensitive receptors in proximity to these sources. Each project would be required to identify and mitigate operational noise such that exterior and interior noise levels do not exceed established City standards at any noise-sensitive use. Adherence to the City's noise standards pursuant to Section 17.176.060 of the City's Municipal Code and implementation of the required project-specific mitigation would ensure that the Project's contribution to long-term noise impacts would be **less than cumulatively considerable**.

3.14 POPULATION AND HOUSING

This section of the Draft Environmental Impact Report (EIR) describes the existing population and housing characteristics in both the City of Lake Elsinore (City) and Riverside County (County) and evaluates the potential impacts of the proposed Project on population and housing growth. This section is based on sources of demographic information provided by various agencies, including the Southern California Association of Governments (SCAG), the City of Lake Elsinore General Plan's Housing Element (2021–2029), the California Department of Finance, and the United States Census Bureau (Census).

3.14.1 Scoping Process

Potential impacts to population and housing were not identified as a potential impact or area of public concern during the public scoping meeting held on August 1, 2024, for the proposed Project. The City also received no comments concerning the proposed Project's potential to cause significant impacts to the environment with regard to population and housing in response to the Notice of Preparation (NOP) issued on July 15, 2024. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.14.2 Methodology

City and County demographic information, in conjunction with data from the Census and Southern California Association of Governments (SCAG) projections, were used to describe the existing and projected future population, employment, and housing characteristics in the city and county. Projections for these topics were identified for the existing conditions and Project build out. Demographic and socioeconomic data from SCAG and the City's General Plan Update are relatively consistent; however, since each use different methods of data collection and analysis, data do not always have the same results and may not represent the same data year. Accordingly, the population, housing, and employment numbers used in this analysis vary somewhat, depending on the source cited. Despite the variances, the data used represent the best available data sources and provide a meaningful description of the population and housing characteristics of the city. The population and housing data were used to evaluate potential impacts related to unplanned growth and displacement of people or housing that could result from implementation of the proposed Project.

3.14.3 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. The City is characterized by urban areas, including single-family and multifamily residential uses and concentrations of retail, office, and industrial uses, areas of undeveloped land, and areas of past and present mineral resource extraction activities. This section describes the existing environmental setting within Riverside County, Lake Elsinore, and the Project site as it relates to population and housing.

The 140.04-acre Project site is currently undeveloped, irregular in shape, and generally bounded by undeveloped land in all directions as well as public right-of-way (ROW), including segments of Nichols Road, Pierce Street, and Baker Street. The Project site has a history of limited agriculture uses; however, no agricultural uses currently exist on the site. No existing residences or residents are located within the Project site. Structural foundations from one former residence are located within

the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street.

Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and a residence is located adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). As previously stated, the Project site itself is undeveloped, and all the existing residential and institutional uses (i.e., property encompassing the aboveground water storage tank) are outside the Project site limits.

3.14.3.1 Population and Housing

Lake Elsinore has experienced rapid population growth over the past 2 decades, as has most of Riverside County. According to the City's General Plan EIR, the population of the city grew approximately 58 percent, from 18,285 to 28,930 residents, between 1990 and 2000.[1] The growth during this period was substantial due to the relative affordability of the area in comparison with Los Angeles and Orange counties, and similar to other cities within the county. As reported by the Census, the population of the city grew approximately 24 percent, from 51,821 to 64,037 residents, between 2010 and 2020.[2] This growth is approximately three times that experienced by the county as a whole.[3]

Southern California Association of Governments. SCAG is the regional planning agency for the six-county Southern California region that includes Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial counties, and is responsible for preparing a regional growth forecast in conjunction with its efforts to prepare an *Regional Transportation Plan/Sustainable Communities Strategy* (RTP/SCS) for its regional planning area. SCAG develops socioeconomic estimates and growth projections (including population, households, and employment growth) for cities in the SCAG region through enhanced forecasting methods and interactive public outreach. These estimates and projections provide the analytical foundations for SCAG's transportation planning and other programs at the regional and small geographic area levels, including the Regional Housing Needs Assessment (RHNA). SCAG's Connect SoCal, adopted in April 2024, is an RTP/SCS plan developed pursuant to Senate Bill (SB) 375 to assist in the State's reduction of greenhouse gas (GHG) emissions by considering land use allocation in its RTP.[4] Connect SoCal thus builds upon and expands land use and transportation strategies to increase mobility options and achieve more sustainable growth patterns. The SCAG RTP/SCS Demographics and Growth Forecast is meant to provide a common foundation for regional and local planning, policymaking, and infrastructure provision within the SCAG region.[5] SCAG growth forecasts predict a steady increase in population and housing through 2050. The growth

1 City of Lake Elsinore. 2011. *General Plan Update, Draft Program EIR.* Section 3.13, Population and Housing. December.

2 California Department of Finance, Demographic Research Unit. 2021. *Report E-4, Population Estimates for Cities, Counties, and the State, 2011-2020, with 2010 Benchmark.* May 7.

3 Ibid.

4 Southern California Association of Governments. 2024. *Connect SoCal, The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy*. April 4.

5 Southern California Association of Governments. 2024. *Connect SoCal, The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Technical Report*. April 4.

forecasts for the city and county are provided below in Table 3.14.A: Connect SoCal Population Forecasts (2019–2050) and Table 3.14.B: Connect SoCal Housing Forecasts (2019–2050). These projections also contain projections for the interim horizon year of 2035 that are used as a reference point for discussing population and housing growth throughout this section.

Table 3.14.A: Connect SoCal Population Forecasts (2019–2050)

	2019	2035	2050	2019–2050 Increase	Percent Change 2019-2050
Total Population					
Lake Elsinore	69,800	84,200	92,000	22,200	31.8
Riverside County	2,386,100	2,784,200	2,797,600	411,500	17.2

Source: Southern California Association of Governments, RTP/SCS Demographics and Growth Forecast Table 14 (2024), https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 11, 2025).

Table 3.14.B: Connect SoCal Housing Forecasts (2019–2050)

	2019	2035	2050	2019–2050 Increase	Percent Change 2019-2050
Total Households					
Lake Elsinore	20,000	26,000	29,300	9,300	46.5
Riverside County	744,000	965,200	1,062,000	318,000	42.7

Source: Southern California Association of Governments, RTP/SCS Demographics and Growth Forecast Table 14 (2024), https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 11, 2025).

Population. As shown in Table 3.14.A, from 2019 to 2050, SCAG estimates that the city's population will grow by approximately 31.8 percent, while the countywide population is expected to increase by approximately 17.2 percent. However, it should be noted that the SCAG 2050 population projections for the city are lower than the projected population with build out of the City of Lake Elsinore General Plan by 2030, which could be explained by the fact that the City's General Plan EIR accounts for unincorporated portions of the city's planning area in addition to the city itself. According to the General Plan EIR, the projected population with build out of both the incorporated and unincorporated portions of the city's planning area is 318,856 by 2030, with projected build out for the incorporated area being 209,756 persons.[6] The analysis presented in this section relies upon population estimates provided in the City's General Plan EIR rather than SCAG's population estimates in order to analyze a conservative scenario.

Households. As shown in Table 3.14.B, from 2019 to 2050, SCAG estimates that the number of households within the city will grow by approximately 46.5 percent, while the number of households within the county is expected to increase by approximately 42.7 percent. Similar to the projected population growth referenced above, the SCAG 2050 housing projections for the City are lower than the projected housing with build out of the City's General Plan by 2030, which could be explained by the fact that the City's General Plan EIR accounts for unincorporated portions of the City's planning

[6] City of Lake Elsinore. 2011. *General Plan Update, Draft Program EIR.* Section 3.13 Population and Housing. December. Page 3.13-21.

area in addition to the city itself, while SCAG does not. According to the City's General Plan EIR, the projected housing with build out of both the incorporated and unincorporated portions of the City's planning area (Sphere of Influence) could reach a maximum of 94,616 homes by 2030.[7] The analysis presented in this section relies upon household estimates provided in the City's General Plan EIR rather than SCAG's household estimates in order to analyze a conservative scenario.

3.14.3.2 Employment

Residents who work within the city are primarily employed in educational services, healthcare and social assistance, retail trade, and construction.[8] This is consistent with the major employers in the city. Major employers include the Lake Elsinore Unified School District with 2,497 employees, M & M Framing with 500 employees, Stater Bros. with 329 employees, and Lake Elsinore Hotel and Casino with 275 employees. Half of the top 10 employers in Lake Elsinore are in the retail sector.[9]

The SCAG growth forecasts predict a steady increase in employment opportunities through 2050.[10] The City is forecast to add 6,000 jobs between 2019 and 2050. The employment growth forecasts for the City and County are provided below in Table 3.14.C. These projections are used as a reference point for discussing employment growth as it relates to the Project's employment, population, and housing growth throughout this section.

Table 3.14.C: Connect SoCal Employment Forecasts (2019–2050)

	2019	2035	2050	2019–2050 Increase	Percent Change 2019–2050
Total Employment					
Lake Elsinore	16,700	20,900	22,700	6,000	35.9
Riverside County	847,200	1,056,600	1,184,900	337,700	29.9

Source: Southern California Association of Governments, RTP/SCS Demographics and Growth Forecast Table 14 (2024), https://scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed July 11, 2025).

As shown in Table 3.14.C, from 2019 to 2050, SCAG estimates employment opportunities within the city will grow by approximately 35.9 percent, while employment opportunities within the county are expected to increase by approximately 29.9 percent. However, SCAG 2050 employment projections for the city are lower than the projected employment with build out of the City's General Plan by 2030. According to the City's General Plan EIR, the projected employment with build out of both the

7 City of Lake Elsinore. 2011. *General Plan Update, Draft Program EIR.* Section 3.13 Population and Housing. December. Page 3.13-21.

8 City of Lake Elsinore. 2022. Lake Elsinore General Plan. Section 6.0, Housing Element 2021 to 2029. August 23.

9 Ibid.

10 Although SCAG approved the most recent RTP/SCS (Connect SoCal 2024) in April 2024, this update did not include growth forecasts for counties or cities within SCAG's planning area. Therefore, the growth forecast from SCAG's previous RTP/SCS (Connect SoCal 2020) are provided to show population and housing growth in Riverside County and the city of Lake Elsinore.

incorporated and unincorporated portions of the City's planning area is 118,792 by 2030.[11] The analysis presented in this section relies upon employment estimates provided in the City's General Plan EIR rather than SCAG's employment estimates in order to analyze a conservative scenario.

3.14.3.3 Age Characteristics

A city's age distribution often shapes its housing demand because different age groups prefer different types of housing. According to the City's Housing Element, the city's population is aging, a trend seen nationwide. The city's population, however, is younger compared to the population in the county.[12] Table 3.14.D: City of Lake Elsinore Age Characteristics (2018–2022) provides the City's population by age group using data from the 2018–2022 American Community Survey (ACS) 5-year estimate.

As shown in Table 3.14.D, the city has a slightly greater percentage of persons under 18 years old compared to the county (28.3 percent and 24.6 percent, respectively) and a greater percentage of persons 25 to 44 years old compared to the county (30.6 percent and 27.0 percent, respectively). However, the city has a slightly smaller percentage of persons 45 to 64 years old (22.4 percent and 23.8 percent, respectively) and 65 years old and older (8.9 percent and 14.8 percent, respectively) compared to the county. The percentage of persons aged 18 to 24 years old is the same between the city and county (9.8 percent). In addition, the city has a slightly younger median age compared to the county (32.5 years and 36.3, respectively).

Table 3.14.D: City of Lake Elsinore Age Characteristics (2018–2022)

Age Group	City of Lake Elsinore		Riverside County	
	Persons	Percentage	Persons	Percentage
Under 18 Years	19,802	28.3	567,531	24.6
18 to 24 Years	6,853	9.8	237,956	9.8
25 to 44 Years	21,421	30.6	656,194	27.0
45 to 64 Years	15,697	22.4	578,644	23.8
65 and Over	6,220	8.9	359,162	14.8
Total	**69,993**	**100**	**2,429,487**	**100**
Median Age	**32.5**		**36.3**	

Source: United States Census Bureau. 2018–2022 American Community Survey 2022 5-Year Estimate Table S0101, https://data.census.gov/table/ACSST1Y2022.S0101?t=Age%20and%20Sex&g=160XX00US0639486 (accessed September 5, 2024).

3.14.3.4 Jobs/Housing Balance

Pursuant to Government Code Section 65890.1, State land use patterns should be encouraged that balance the location of employment-generating uses with residential uses so that employment-related commuting is minimized. The City's Housing Element analyzing economic characteristics of the community to identify current and projected housing needs in the city and achieve a healthy

[11] City of Lake Elsinore. 2011. *General Plan Update, Draft Program EIR.* Section 3.13, Population and Housing. December. Page 3.13-21.

[12] City of Lake Elsinore. 2022. Lake Elsinore General Plan. Section 6.0 Housing Element, 2021 to 2029. August 23.

balance between jobs and housing. Additionally, the Housing Element emphasized the need for more local jobs for residents and access to employment opportunities near residential neighborhoods.

The jobs-to-housing ratio is a planning tool used by jurisdictions to achieve an appropriate balance of jobs to housing. According to SCAG's Connect SoCal, the SCAG region has a 1.45:1 jobs-to-housing ratio.[13] SCAG has not adopted a recommended jobs-to-housing ratio for the SCAG region. However, the American Planning Association (APA), a professional organization that publishes resources and best practices for the planning at the local, regional, State and national levels, has established a recommended jobs-to-housing ratio of 1.5:1 for individual communities, which is considered optimal, with an acceptable range of 1.3:1 to 1.7:1.[14] Ratios within this acceptable range can be considered adequate.

Using the recommended APA ratio for comparison purposes, the jobs-to-housing ratio within the SCAG region can be considered relatively "balanced," meaning a balance between employment and housing opportunities without requiring a commute outside of a specific community. Below 1.5:1, the community has more housing available than jobs. Above 1.5:1, the community has more jobs than housing, and residents may be required to commute in from outside the area. The following describes the existing jobs-to-housing ratio for Riverside County and the city of Lake Elsinore.

Riverside County. According to SCAG's Connect SoCal and Tables 3.14.B and 3.14.C, Riverside County had a 1.14:1 jobs-to-housing ratio in 2019.[15] The 2019 jobs-to-housing ratio for the county indicates the county had more housing available than jobs compared to the SCAG region and is therefore "housing rich, but jobs poor." It should be noted that SCAG specifically states that Riverside County has "historically provided space to house workers whose jobs are elsewhere."[16] As evidenced by the SCAG population and employment growth projections, this trend is expected to continue in the future as the county is anticipated to continue to experience a substantially higher rate of household growth than job growth. According to SCAG, the county's resident labor force in 2019 was 1,135,000, while its total employment was 847,000. As such, approximately 25.4 percent of the county's resident labor force was employed outside the county in 2019. .

City of Lake Elsinore. The city has established a goal of achieving a balance of one job per every 1.05 households, or a jobs-to-housing ratio of 0.95:1, by 2030.[17] Using the same methodology discussed above to calculate the jobs-to-housing ratios for the SCAG region and Riverside County, the city had a 0.84:1 jobs-to-housing ratio in 2019.[18] Similar to the county, the SCAG population and employment

[13] 8,976,000 employees ÷ 6,193,000 households = 1.45 jobs per household.

[14] Jerry Weitz. 2003. *Jobs-Housing Balance.* American Planning Association: Planning Advisory Service Report Number 516.

[15] 847,000 employees ÷ 744,000 households = 1.14 jobs per household.

[16] Southern California Association of Governments. 2024. *Connect SoCal, The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Technical Report*. April 4.

[17] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0 Community Form. December 11.

[18] 16,700 employees ÷ 20,000 households = 0.84 job per household.

growth projections shown in Tables 3.14.B and 3.14.C indicate that the city is expected to continue to add housing faster than jobs between 2019 and 2050.

3.14.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.14.4.1 Federal Policies and Regulations

There are no federal regulations applicable to the proposed Project regarding population and housing.

3.14.4.2 State Policies and Regulations

Senate Bill 330. SB 330 includes restrictions on implementing new development policies, standards, or conditions that may restrict housing developments, including any initiatives or referenda voted into law by the general populace. Under this law, among other things, cities and counties are restricted from implementing any new development policies, standards, or conditions that have any of the following effects:

- A change to the general plan land use designation, specific plan land use designation, or zoning that results in a less intensive use. Less intensive use means, for example: (i) reductions in height, density, or floor area ratio; (ii) new or increased open space or lot size requirements; (iii) new or increased setback requirements, minimum footage requirements, or maximum lot coverage limitations; and (iv) anything that would lessen the intensity of housing.

- A reduction of the intensity of land use within an existing general plan land use designation, specific plan land use designation, or zoning below what was allowed under the applicable land use designation and zoning ordinance in effect as of January 1, 2018.

California Housing Element Requirements (Government Code §§ 65580 to 65589). State law recognizes the vital role local governments play in the supply and affordability of housing. Local governments are required to adopt a comprehensive, long-term general plan for the development of the jurisdiction, including a Housing Element meeting the existing and projected housing needs. To that end, California Government Code requires that housing elements achieve legislative goals to:

- Identify adequate sites to facilitate and encourage the development, maintenance, and improvement of housing for households of all economic levels, including for persons with disabilities.

- Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all incomes, including those with disabilities.

- Assist in the development of adequate housing to meet the needs of low- and moderate-income households.

- Conserve and improve the condition of housing and neighborhoods, including existing affordable housing. Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

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

State of California housing element laws (California Government Code §§ 65580 to 65589) require that each city and county identify and analyze existing and projected housing needs within its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs. The housing elements of each city or county are required to be updated every 8 years.

3.14.4.3 Regional Policies and Regulations

Southern California Association of Governments. As the designated metropolitan planning organization (MPO)[19] for the six-county subregion that includes Orange County, SCAG prepares several plans to address regional growth, including the RTP/SCS. The regional growth forecasts undertaken by SCAG are developed for three planning horizons: 2030, 2035, and 2045. SCAG is mandated by federal and State law to research and draw up plans for transportation, growth management, hazardous waste management, and a regional growth forecast that form the foundation for these plans and regional air quality plans developed by the South Coast Air Quality Management District (SCAQMD). SCAG prepares several plans to address regional growth, including the Regional Comprehensive Plan (RCP), the RHNA, the RTP/SCS, the Regional Transportation Improvement Program, and the annual State of the Region reports to measure progress toward achieving regional planning goals and policies.

Regional Comprehensive Plan. SCAG's RCP provides a policy framework for regional planning in Southern California. The RCP calls for city and county coordination and improvement when addressing regional issues related to growth management and development. However, the RCP serves as a voluntary "toolbox" to assist local jurisdictions in making their general and specific plans and individual projects in implementing sustainable measures. As identified in Resolution No. 08-502-1 (*Resolution of the Southern California Associated of Governments Accepting the 2008 Regional Comprehensive Plan for the SCAG Region*), given its advisory nature, the 2008 RCP is not used in SCAG's Inter-Governmental Review (IGR) process (SCAG 2008a).

Regional Transportation Plan/Sustainable Communities Strategy. On April 4, 2024, SCAG adopted the 2024 RTP/SCS (Connect SoCal 2024). Connect SoCal 2024 provides an update to the 2020 RTP/SCS (Connect SoCal 2020) and provides a common foundation for regional and local planning,

[19] An MPO is a federally mandated and federally funded transportation policymaking organization that is made up of representatives from local government and governmental transportation authorities. In 1962, the United States Congress passed legislation that required the formation of an MPO for any urbanized area with a population greater than 50,000.

policymaking, and infrastructure goals in the SCAG region.[20] The horizon year for the 2024 RTP/SCS is 2050. The core vision for Connect SoCal 2024 is to increase mobility options and achieve a more sustainable growth pattern. The goals of Connect SoCal 2024 are designed to achieve this vision and fall into four core categories, including mobility, communities, environment, and economy, as described below:

- **Mobility:** Build and maintain an integrated multimodal transportation network.
- **Communities:** Develop, connect, and sustain communities that are livable and thriving.
- **Environment:** Create a healthy region for the people of today and tomorrow.
- **Economy:** Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all residents.

Connect SoCal 2024 outlines the challenges facing the region, shared goals and policies, and the transportation investments and land use strategies and policies to meet GHG reduction targets and deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel time reliability, air quality, economic productivity, environmental justice, and transportation.

3.14.4.4 Local Policies and Regulations

City of Lake Elsinore Housing Element. The Housing Element is required by California State law (Section 65580 to 65589 of the Government Code) to be a component of every city's general plan because housing needs are recognized as a statewide concern. As such, the housing element of a jurisdiction's general plan is the only element that is subject to approval by the State. Pursuant to State law, the housing element must identify the city's housing needs, the sites that can accommodate these needs, and the policies and programs to assure that the housing units necessary to meet these needs can be provided. The primary goal of the housing element is to provide a range of housing opportunities for all income groups.

The 2021–2029 Housing Element was adopted on August 23, 2022, as a guide for housing within the city of Lake Elsinore. The Housing Element provides an indication of the need for housing in the community in terms of housing affordability, availability, adequacy, and accessibility. The Housing Element also provides a strategy to address housing needs and identifies a series of specific housing programs to meet community needs.

The Housing Element identifies strategies and programs to: (1) encourage the development of a variety of housing opportunities; (2) provide housing opportunities for persons of lower and moderate incomes; (3) preserve the quality of the existing housing stock in Lake Elsinore; (4) minimize

[20] Southern California Association of Governments (SCAG). April 2024. 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (Connect SoCal 2024). Website: https://scag.ca.gov/sites/main/files/file-attachments/23-2987-connect-socal-2024-final-complete-040424.pdf?1712261565 (accessed September 5, 2024).

governmental constraints; and (5) promote equal housing opportunities for all residents. To this end, the Housing Element consists of:

- An analysis of the city's demographic and housing characteristics and trends;
- A review of potential market, governmental, and environmental constraints to meeting the city's identified housing needs, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing, permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development;
- An evaluation of land, administrative, and financial resources available to address the housing goals;
- A review of past accomplishments under the previous Housing Element, including effectiveness of the element, progress in program implementation, continued appropriateness of the housing programs, and how past programs were effective in addressing the housing needs of the special populations; and
- A Housing Plan to address the identified housing needs, including housing goals, policies, and programs.

City of Lake Elsinore General Plan. The City's General Plan addresses population and housing in Chapter 2.0 (Community Form) and includes the following goals and policies related to employment that are applicable to the proposed Project.

- **Goal 1:** Create a diverse and integrated balance of residential, commercial, industrial, recreational, public and open space land uses.
    - **Policy 1.8**: Encourage a jobs/housing balance of one job for every 1.05 households by the year 2030.

Regional Housing Needs Assessment. State law (Government Code Section 65580 et seq.) requires cities and counties to plan for their fair share of projected housing construction needs in their region. Housing unit construction goals are set by the State Department of Housing and Community Development and allocated to cities through regional planning agencies such as SCAG. This is called the RHNA. Future housing need refers to the proportion of the region's future housing needs allocated to a community. Each jurisdiction's future housing need is calculated in terms of four factors: (1) the number of units needed to accommodate forecast global household growth; (2) the number of units needed to replace demolition due to attrition in the housing stock (i.e., fire damage, obsolescence, redevelopment, and conversion to nonhousing uses); (3) maintenance of an ideal vacancy rate for a well-functioning housing market; and (4) an adjustment to avoid an overconcentration of lower-income households in any one jurisdiction.

The RHNA prepared by SCAG defines the housing unit construction goals for the region. The City's fair share for the planning period between 2021 and 2029 (the last adopted RHNA period) was established

by SCAG at 6,681 units. The RHNA target number was based on projected household growth and the resulting need for construction of additional housing units allocated over the Sixth Cycle planning period from 2021 to 2029. This 6,681-unit target was divided into the following income groups according to median family income, as shown in Table 3.14.E: City of Lake Elsinore Regional Housing Needs Allocation (2021–2029), below.

Table 3.14.E: City of Lake Elsinore Regional Housing Needs Allocation (2021–2029)

Income Level	Percentage of Area MFI	No. of Units	% of Total Allocation
Very Low	0–50%	1,878	28.1
Low	51–80%	1,099	16.4
Moderate	81–120%	1,134	17.0
Above Moderate	>120%	2,570	38.5
TOTAL		**6,681**	**100**

Source: City of Lake Elsinore, Housing Element 2021 to 2029, Table 2.17: Regional Housing Needs Allocation 2021–2029 (2022)
MFI = median family income

3.14.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Guidelines.* Based on these thresholds, implementation of the proposed Project would have a significant adverse impact related to population and housing if it would:

Threshold 3.14.1: Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure), or

Threshold 3.14.2: Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

3.14.6 Project Impacts

Threshold 3.14.1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant. The proposed Project includes development of 65.81 acres with two warehouses totaling 1,000,451 square feet; 31.75 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area. The installation of off-site improvements includes roadway improvements to existing roadways (e.g. Baker Street, Pierce Street, Nichols Road) and extension of electric and sewer utilities to the Onsite Development Area.

Construction. Construction of the proposed Project would provide short-term construction jobs over a period of approximately 17 months. Construction jobs would be temporary and would be

specific to the variety of construction activities. The workforce is expected to include a variety of construction trade workers, such as cement finishers, ironworkers, welders, carpenters, electricians, painters, grading workers, site preparation workers, surveyors, and laborers. Generally, construction workers are only at a job site for the timeframe in which their specific skills are needed to complete that phase of construction. It is expected that local and regional construction workers would be available to serve the construction needs of the proposed Project. Construction workers would not be expected to relocate their households' place of residence while working on the proposed Project because on-site construction activities would be temporary (expected to last approximately 17 months, with the discrete or specialized phases of construction occurring for even shorter durations). Therefore, the Project would result in a **less than significant** impact associated with inducing substantial population growth in the area, and no mitigation would be required.

Operation. The proposed Project would construct two new warehouses within the Onsite Development Area, which is currently vacant, introducing approximately 483 new permanent warehouse employees according to the Economic Benefit Analysis prepared for the Project (Appendix M).[21] According to Census data,[22] as of 2024, the city had a total population of 71,452 and the county had a total population of 2,442,378 people. The proposed 483 new employees represent a negligible increase to the total populations of the city and county in the event that all 483 employees move to the city as a result of this employment (less than 1 percent and 0.02 percent, respectively), which is not anticipated to occur due to the existing residential population in the area and the Project's easily accessible location near I-15.

The 483 new permanent employees would represent an approximately 2.9 percent[23] increase in the City's total employment. The addition of these employees would improve the city's jobs-to-housing ratio and help the city meet its jobs-to-housing ratio goal of 0.95:1 (i.e., one job for every 1.05 households) by the year 2030 under Policy 1.8 of Chapter 2.0, Community Form (Section 2.3, Land Use), of the General Plan. With the addition of 483 new permanent employees for the proposed Project, the city's jobs-to-housing ratio would increase slightly to 0.86:1 (based on 2019 data).[24] These 483 jobs would represent approximately 8 percent of the 6,000 jobs anticipated to be created within the city between 2019 and 2050. It should be noted that these jobs are consistent with those anticipated to be generated by the site's existing General Plan land use designation of Limited Industrial.

As of January 2025, the city had an unemployment rate of 5.0 percent and the county had an unemployment rate of 5.3 percent.[25] These unemployment rates suggest an available local and

21 Development Planning & Financing Group. 2024. *Baker and Pierce Street Development – Executive Summary of Economic Benefit Analysis, Riverside Legacy IV Nichols Road, LLC.* January (Appendix M).

22 United States Census Bureau. 2023 Profile. Website: https://data.census.gov/ (accessed December 6, 2024).

23 (483 new employees ÷ 16,700 employees) * 100 = approximately 2.9 percent.

24 17,183 employees ÷ 20,000 households = 0.86 jobs per household.

25 California Employment Development Department. Labor Force and Unemployment Rate for Cities and Census Designated Places. Website: https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html#CCD (accessed March 2025).

regional labor pool exists to serve the long-term employment opportunities that would be provided by the proposed Project. Therefore, it is unlikely that the proposed Project's labor demand would necessitate a substantial number of employees from outside the region to meet the need for employees for operation of the proposed Project. It is possible that a nominal number of employees could relocate to the city or nearby unincorporated county areas. However, because the proposed Project is consistent with the General Plan land use designation of the Project site, as the proposed warehouse development is a permitted use in the existing land use designation of Limited Industrial,[26] any such incremental population increase resulting from the proposed Project is not considered substantial or unplanned. According to the City's General Plan EIR, the projected population with build out of both the incorporated and unincorporated (Sphere of Influence) portions of the city's planning area is 318,856 by 2030, with projected build out for the incorporated area being 209,756 persons. Projected housing with build out of both the incorporated and unincorporated portions of the city's planning area is 94,616 by 2030, and projected employment growth with build out of both the incorporated and unincorporated portions of the city's planning area is 118,792 by 2030.[27] When compared to the City's General Plan EIR growth projections, the 483 jobs from the proposed Project would account for 0.4 percent of this projected employment growth, which is not substantial or unplanned.[28]

The proposed Project includes installation of new water, sewer, and electric lines to interconnect to the existing water, sewer, and electricity infrastructure to serve the Onsite Development Area. Specifically, the existing Nichols Lift Station, located at the intersection of Nichols Road and Pierce Street, has already been planned for expansion along with build out of the Project vicinity. The timing of the expansion is based on development of areas outside the Project site. Should development of the Project occur prior to build out of the Nichols Lift Station and additional capacity be required, the Nichols Lift Station would be upgraded to accommodate the Project's flows. The lift station would be improved within the existing footprint of the current lift station and within the existing public ROW. Improvements would include the installation of three pumps, each rated for 1,100 gallons per minute (gpm) and the construction of an associated above-grade control structure.

It is possible that development of the infrastructure proposed as part of the Project (specifically, the proposed improvements to Nichols Road, Baker Street, and Pierce Street and to the existing Nichols Lift Station) could induce additional population growth by providing upgraded facilities capable of supporting development. However, these improvements are already planned for and are conditioned upon the Project in accordance with the City's Collector and Secondary roadway designations in the General Plan Circulation Element and in anticipation of projected growth through General Plan build out to ensure that necessary services and infrastructure sufficient to serve the planned growth exist. Therefore, development of the proposed Project would occur in a manner that is expected by the City growth forecasts and General Plan, and would not result in substantial unplanned population growth.

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26 City of Lake Elsinore. 2011. City of Lake Elsinore General Plan. Chapter 2.0, Community Form. December 11.

27 City of Lake Elsinore. 2011. *General Plan Update, Draft Program EIR.* Section 3.13, Population and Housing. December. Page 3.13-21.

28 (483 new employees ÷ 118,792 employees) * 100 = approximately 0.4 percent.

Based on the analysis above, operation of the proposed Project would not induce substantial unplanned population growth in the area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Impacts would be **less than significant**, and mitigation is not required.

Threshold 3.14.2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. In its existing condition, the Project site consists of undeveloped land and public ROWs. Although structural foundations from one former residence are located within the Onsite Development Area and structural foundations from two former residences are within the Restoration Area generally along Baker Street, no habitable structures exist on the Project site. The proposed Project would not displace any existing housing or people in or around the Project site. Therefore, there would be **no impact** related to the displacement of substantial numbers of existing people or housing, and no mitigation is required.

3.14.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts related to population and housing.

3.14.8 Compliance Measures and Mitigation Measures

No compliance measures are applicable to the proposed Project.

The proposed Project would not result in any significant adverse impacts related to population and housing, and no mitigation would be required.

3.14.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed Project related to population and housing. No mitigation is required.

3.14.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for population and housing. The cumulative area for the discussion of population and housing impacts is the city, but it should be viewed in the larger context of Riverside County. The proposed Project is consistent with the General Plan land use designation for the Project site. Although the proposed Project would generate approximately 483 new permanent employees, the Project is consistent with the General Plan land use designation, and this growth has been previously anticipated by the General Plan[29] and is therefore not considered unplanned.

The 483 new permanent employees would result in a beneficial increase to the current jobs-to-housing ratio in the city and help the City meet its stated goal of one job for every 1.05 households

[29] SCAG 2050 employment projections for the city are 22,700, which is lower than the projected employment with build out of the City's General Plan by 2030, which would total 118,792 jobs in the city and its Sphere of Influence by 2030.

(or a jobs-to-housing ratio of 0.95:1) by 2030 under Policy 1.8 of Chapter 2.0, Community Form (Section 2.3, Land Use), of the General Plan. Furthermore, the current 5 percent unemployment rate in the city means approximately 1,900 persons classified as part of the labor force in the city are unemployed,[30] and an available local and regional labor pool exists to serve the long-term employment opportunities that would be provided by the proposed Project. Therefore, it is unlikely that the proposed Project's labor demand would necessitate a substantial number of employees from outside the region to meet the need for employees resulting from development of the proposed Project, and the jobs created by the Project would benefit the city's jobs-to-housing imbalance such that growth would not be cumulatively considerable.

The SCAG 2050 population, housing, and employment projections for the city are lower than the projected population, housing, and employment with build out of the City's General Plan by 2030. According to the City's General Plan EIR, the projected population with build out of both the incorporated and unincorporated portions of the city's planning area would be 318,856 by 2030, with projected build out for the incorporated area being 209,756 persons. Projected housing with build out of both the incorporated and unincorporated portions of the city's planning area would be 94,616 by 2030, and projected employment with build out of both the incorporated and unincorporated portions of the city's planning area would be 118,792 by 2030.[31] As previously stated, the 483 jobs potentially created by the proposed Project would account for 0.4 percent of this projected employment growth.[32] Because these projections are based upon build out of the city's planning area in a manner consistent with General Plan planned land uses, and because the proposed warehouse development is a permitted use in the site's General Plan land use designation of Limited Industrial, the Project is consistent with anticipated development in the city and would not result in unplanned growth that could become cumulatively considerable.

It is possible that development of infrastructure proposed as part of the Project (specifically, the proposed improvements to Nichols Road, Baker Street, and Pierce Street and to the existing Nichols Lift Station) could encourage future population growth. However, the infrastructure improvements and growth have already been anticipated and planned for in local and regional planning documents, and the Project would not expand infrastructure in a manner that could induce unplanned growth. The infrastructure improvements are conditioned upon the Project in accordance with the City's Collector and Secondary roadway designations in the General Plan Circulation Element and infrastructure plans in anticipation of projected growth through General Plan build out to ensure that necessary services are provided. The proposed lift station does not expand water services to areas of unplanned services, and the roadway improvements would not expand the scope or change the designations of those roadways beyond the City's planned improvements in the General Plan Circulation Element. Therefore, development of the proposed Project would be consistent with

[30] California Employment Development Department. Labor Force and Unemployment Rate for Cities and Census Designated Places. Website: https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html#CCD (accessed March 2025).

[31] City of Lake Elsinore. 2011. *General Plan Update, Draft Program EIR.* Section 3.13, Population and Housing. December. Page 3.13-21.

[32] (483 new employees ÷ 118,792 employees) * 100 = approximately 0.4 percent.

planned infrastructure growth and would not result in unplanned population growth. When considered in conjunction with past, present, and future projects, impacts pertaining to population and housing would be **less than cumulatively considerable**. Mitigation is not required.

3.15 PUBLIC SERVICES

This section of the Draft Environmental Impact Report (EIR) identifies the public services providers for the City of Lake Elsinore and the Project site and evaluates the potential impacts of the proposed Project on those public services. This section is based, in part, on information provided in the City of Lake Elsinore (City) General Plan, the City of Lake Elsinore General Plan EIR, the Riverside County General Plan, and the Riverside County General Plan EIR. This section addresses the following public services (service providers are noted in parentheses):

- Fire protection (Riverside County Fire Department [RCFD])
- Police protection (Lake Elsinore Police Department [LEPD] through contract with the Riverside County Sheriff's Department [RCSD])
- Public schools (Lake Elsinore Unified School District [LEUSD])
- Parks (City of Lake Elsinore Community Services Department)
- Other public services (Riverside County Library System [RCLS], Animals Friends of the Valley [AFV], and City Hall)

3.15.1 Scoping Process

Potential impacts to public services were not identified as a potentially significant impact or area of public concern during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received one comment letter in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to public services. NOP comments related to hazardous materials included comments from the following:

- Jefery Ong, July 10, 2022, expressed concerns regarding strain on existing infrastructure, including emergency services and safety.

Please note that issues related to public services identified by public comments involving potentially significant impacts on the environment according to the California Environmental Quality Act (CEQA) and/or raised by responsible agencies are identified and addressed in this chapter. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.15.2 Methodology

Information regarding public services was obtained from agency websites, including the RCFD, the California Department of Forestry and Fire Protection (CAL FIRE), the LEPD, the California Department of Education and the LEUSD, and planning documents adopted by service providers. Information was also obtained from the City of Lake Elsinore *General Plan Update Existing Conditions Atlas* (2024), the City of Lake Elsinore General Plan EIR, and the Riverside County General Plan EIR Volume I.

3.15.3 Existing Environmental Setting

The Project site is located in the city of Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within Riverside County, Lake Elsinore, and the Project site as it relates to public services.

The 140.04-acre Project site is currently undeveloped and includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses (i.e., property encompassing the aboveground water storage tank) are located outside of the Project site limits. The Project site has a history of limited agriculture use; however, no agricultural uses currently exist on the site. As such, the Project site is undeveloped and does generate demand for public services under existing conditions.

3.15.3.1 Fire Protection

Mapping by CAL FIRE indicates that the Project site is located within an area statutorily designated as a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA). Refer to Section 3.20, Wildfire, of this Draft EIR for more information regarding the Project site's susceptibility to wildland fires.

The City contracts with the RCFD and CAL FIRE for fire protection services. Both agencies respond to all types of emergencies, ranging from wildland fires and residential/commercial structure fires to automobile accidents, medical aid of all types, search and rescue missions, hazardous material spills, floods, earthquakes, and more. In the case of a fire response, the County is part of a mutual aid program with all the cities in the County to provide, and receive, aid on an as-needed basis. Upon the receipt of a call for mutual aid through the County's Emergency Command Center (ECC), the County's mutual aid coordinator will determine whether a city or the County will provide a response. Most County fire stations have a minimum of two career firefighters (typically a captain and a firefighter) on duty. Volunteer firefighters typically augment the career firefighters on the first-roll engine. Additional volunteer firefighters may respond on a rescue squad or second-roll fire engine, which is exclusively staffed by volunteer firefighters.[1] The RCFD operates 93 fire stations in 17 battalions, providing fire suppression, emergency medical, rescue, and fire prevention services.[2] The City is served by Battalion 2 in the Southwest Division of the RCFD.

[1] County of Riverside. Riverside County General Plan EIR. Volume I, Section 4.0, Impacts and Mitigation Measures, Section 4.15.1, Fire Protection. Website: https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i#4.15.1 (accessed September 4, 2024).

[2] City of Lake Elsinore. Lake Elsinore General Plan Certified EIR. Section 3.14, Public Services. Page 3.14-6. Website: https://www.lake-elsinore.org/DocumentCenter/View/2304/Section-314---Public-Services-PDF (accessed September 4, 2024).

There are eight fire stations in Battalion 2 that serve the city. Four of these RCFD stations are located within city limits, including Elsinore Station No. 10 (410 West Graham Avenue), McVicker Park Station No. 85 (29405 Grand Avenue), Canyon Hills Station No. 94 (22770 Railroad Canyon Road), and Rosetta Canyon Station No. 97 (41725 Rosetta Canyon Drive). Type 1 engines are deployed to most fire stations and primarily for structural firefighting. Type 2 engines are smaller engines capable of structural firefighting but also outfitted for rural use such as wildland fire suppression. Type 3 engines, designed for rural operations and wildland firefighting, carry more water but have smaller pumps. Station No. 10 is a joint station seasonally housing a state-owned Type 3 fire engine that is staffed seasonally to primarily respond to incidents in the State Responsibility Area. This station also houses a city-owned Squad, which primarily provides Advanced Life Support assistance, as well as augmentation on other incidents. Station No. 85 has one Type 1 engine (staffed) and one rescue boat (unstaffed) with three on-duty personnel. Station No. 94 operates with two Type 1 engines (one staffed and one reserve) and three on-duty personnel. Station No. 97 has one 75-foot aerial ladder truck (staffed), one reserve ladder truck (unstaffed), a squad unit (unstaffed), and four on-duty personnel. The City receives approximately 4,700 calls for fire and emergency medical service (EMS) services each year.[3]

There are three fire stations within 3 miles of the Project site. Lakeland Village Station No. 11 (33020 Maiden Lane), El Cariso Station No. 51 (32353 Ortega Highway), Wildomar Station No. 61 (32637 Gruwell Street), and Rancho Carillo Station No. 62 (10845 Verdugo Road) are fire stations located outside the city limits that could provide services to the city.[4] Fire paramedics are required at each station and are specially trained firefighters equipped to respond to medical emergencies and ride on all calls. Their arrival on scene can ensure the timely start of emergency medical treatment until an ambulance arrives for patient transport.

The nearest fire station to the Project site is Rosetta Canyon Station No. 97, located at 41725 Rosetta Canyon Drive, a travel distance of approximately 3.3 miles northeast of the Project site. McVicker Park Station No. 85 is the next nearest station, a travel distance of approximately 3.3 miles southwest of the Project site. Standard response times are established by RCFD guidelines.

One goal in the guidelines calls for the response time to any location within the City to be 7 minutes, with the intent to reduce that time to 5 minutes. The RCFD Standards of Cover (SOC) contains information regarding the number of personnel, equipment and the maximum response times for an initial arrival and full assignment arrival to adequately protect a particular fire service jurisdictional area.[5] The SOC contains four fire response categories (Urban, Suburban, Rural, and Outlying) that are used to determine the response times/travel distances for primary and secondary fire stations. The

[3] Riverside County Fire Department. 2016. Riverside County Fire Standards of Cover, Chapter II, Development and Review of Planning Areas. Page 21, 77-78. March. Website: https://www.rvcfire.org/ pdf/strategic-planning/Standards%20of%20Cover.pdf?v=6488 (accessed September 5, 2024).

[4] City of Lake Elsinore. Lake Elsinore General Plan Certified EIR. Section 3.14, Public Services. Page 3.14-6. Website: https://www.lake-elsinore.org/DocumentCenter/View/2304/Section-314---Public-Services-PDF (accessed September 4, 2024).

[5] Riverside County Fire Department. 2016. Riverside County Fire Standards of Cover, Chapter V, Response Time, Workload, and Reliability Analysis. Page 120-122. March. Website: https://www.rvcfire.org/pdf/strategic-planning/Standards%20of%20Cover.pdf?v=6488 (accessed September 5, 2024).

response categories are based on the amount of community build-out presumed in the RCFD Strategic Plan.[6] Initial responses are determined by Primary Responsibility Areas, response drive times, and the closest available equipment at the time of an incident, not by the closest aerial apparatus. RCFD assumes in any given region that one to six fire engines respond, depending on fire call type. In 2023, the average response times for the stations located within the city was 4.7 minutes.[7] Further, a majority of areas within the city are within a 1- to 3-mile drive from a fire station.

RCFD has emergency response time standards that align with the National Fire Protection Association (NFPA). NFPA Standard 1710 is the standard for the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public by career fire departments.[8] NFPA Standard 1710 response time segments include the following: call-processing time under 60 seconds, turnout time under 60 seconds for EMS responses, turnout time under 80 seconds for fire responses, and travel time under 4 minutes. The recommended travel time and total response time for the County is set to 4 minutes and 30 seconds for travel time, and 6 to 7 minutes for total response time (EMS/Fire).[9] There have been a few attempts to measure the incremental value of a 1-minute faster response time for fires and EMS calls, but there is no definitive study of the incremental benefit. Faster is better, but it is unclear how much better in terms of dollars or lives saved. Nevertheless, response time is often used as a surrogate for true measures of outcome.[10] The travel time goal is challenging for urban areas and not realistic for many non-urban areas.[11] Acceptable compliance for NFPA Standard 1710 for urban areas is 90 percent compliance and 80 percent for suburban and rural areas, with the compliance standard of 80 percent reflecting the threshold under which most of the responses fall.[12]

3.15.3.2 Police Protection

Police protection services are provided by LEPD under contract with the RCSD. The LEPD/Sheriff's Station is located at 333 Limited Street, approximately 2.9 miles southeast of the Project site. Services include patrol operations, investigations, traffic division, Special Enforcement Team, and Lake Patrol. The Lake Elsinore Sheriff's Station serves an area of 241 square miles, including the cities of Lake Elsinore and Wildomar, and the unincorporated communities of Alberhill, El Cariso, Glen Eden Hot Springs, Glen Ivy Hot Springs, Good Hope, Lakeland Village, Quail Valley, and Sedco Hills. The City of Lake Elsinore has set a minimum standard of 0.85 officer per 1,000 residents; however, the RCSD

6 Riverside County Fire Department. Strategic Plan 2009-2029. Website: https://www.rvcfire.org/pdf/strategic-planning/StrategicPlan2009.pdf?v=4507 (accessed September 5, 2024).

7 City of Lake Elsinore General Plan Update Existing Conditions Atlas, Public Services and Utilities. Page PS-2. Website: https://www.lake-elsinore.org/DocumentCenter/View/3596/Lake-Elsinore-Existing-Conditions-Atlas---Final (accessed September 5, 2024).

8 National Fire Protection Association. NFPA 1710. Website: https://www.nfpa.org/codes-and-standards/nfpa-1710-standard-development/1710 (accessed September 6, 2024).

9 Riverside County Fire Department. Riverside County Fire Standards of Cover, Chapter V. Response Time, Workload, and Reliability Analysis. Page 120-122. Website: https://www.rvcfire.org/pdf/strategic-planning/Standards%20of%20Cover.pdf?v=6488 (accessed September 5, 2024).

10 Ibid. Page 119.

11 Ibid. Page 120.

12 Ibid. Page 122.

indicates that its desired staffing level is 1.0 officer per 1,000 residents.[13] The average response times from the Lake Elsinore Sheriff's Station for 2023 are 7.25 minutes for Priority 1 calls, 18.55 minutes for Priority 2 calls, 34.44 minutes for Priority 3 calls, and 46.96 minutes for Priority 4 calls.[14]

The LEPD manages the Lake Patrol with marine safety-trained police officers who patrol the lake, beaches, and lake-adjacent parks and enforce boating rules and regulations on the lake and assist stranded boaters. The Lake Patrol is also augmented by a special group of volunteers known as the Lake Elsinore Marine Search and Rescue (LEMSAR). The LEMSAR volunteers patrol the lake, assist with boating collisions and stranded vessels on the lake, and augment the Lake Patrol. LEMSAR volunteers are trained in first aid and CPR and must also complete a United States Coast Guard auxiliary boating and safety course. The LEPD also utilizes reserve police officers. These volunteers are fully trained as police officers and offer an additional level of service and cost savings to the City of Lake Elsinore.

3.15.3.3 Public Schools

LEUSD serves over 144 square miles throughout southwest Riverside County, including the cities of Lake Elsinore, Canyon Lake, and Wildomar, as well as several unincorporated county communities. LEUSD operates 12 elementary schools, 4 middle schools, 3 comprehensive high schools, 2 K–8 schools, and 4 alternative education programs. During the 2023-2024 academic year, LEUSD had an enrollment of 21,257 students.[15]

The Project site is currently within the attendance boundary of the following schools: Alberhill Elementary (TK–5), located at 4170 Brianna Circle, approximately 0.4 mile northwest of the Project site; Terra Cotta Middle School (6–8), located at 29291 Lake Street, approximately 1.9 miles southwest of the Project site; and Lakeside High School (9–12), located at 32593 Riverside Drive, approximately 2.5 miles southwest of the Project site.

3.15.3.4 Parks

The City offers residents and visitors a wide range of parks, open space, beaches, trails, and recreational opportunities. The Community Services Department operates and maintains parks, recreation trails, and recreation facilities throughout the city. There are 16 existing park facilities and 4 recreational facilities totaling 21,000 square feet in the city. Each park features a variety of passive and active recreation facilities. The City has four park classifications that include pocket parks (less than 1 acre), neighborhood parks (1–10 acres), community parks (11–40 acres), and regional parks (25–100 acres). The nearest park to the Project site is Alberhill Ranch Community Park, located at 28200 Lake Street, approximately 1.3 miles northwest of the Project site.

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13 City of Lake Elsinore. 2019. Nichols Ranch Specific Plan (PA 2017-29). Approved June 11. Page 4.14-2. Website: www.lake-elsinore.org/398/Nichols-RanchSpecific-Plan-PA-2017-29-- (accessed September 5, 2024).

14 City of Lake Elsinore. General Plan Update Existing Conditions Atlas, Public Services and Utilities. Page PS-5. Website: https://www.lake-elsinore.org/DocumentCenter/View/3596/Lake-Elsinore-Existing-Conditions-Atlas---Final (accessed September 5, 2024

15 California Department of Education. Data Quest, 2023-2024 Enrollment by Grade, Alberhill Elementary Report. Website: https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=33751760139790&agglevel=School&year=2023-24&ro=y (accessed September 4, 2024

3.15.3.5 Other Public Facilities

Libraries. The City is part of the RCLS, which provides residents access to 34 libraries, 4 Library Connect Vans, 2 museums, and a Creation Station in Riverside County. Services include a collection of over 1.3 million materials and electronic resources. There are two RCLS libraries within the city. These two libraries include Altha Merrifield Memorial Library, located at 600 West Graham Avenue, approximately 2.7 miles southeast of the Project site, and Lakeside Community Library, located at Lakeside High School, 32593 Riverside Drive, Building 200, approximately 2.5 miles southwest of the Project site.

Animal Control. The City contracts with AFV for all animal control services. AFV also provides animal services to the cities of Murrieta and Temecula.

City Hall. Lake Elsinore City Hall is located at 130 South Main Street, approximately 3.1 miles southeast of the Project site. Most City departments are in the main building of City Hall, including the City Manager's Office, Human Resources, Engineering, Building and Safety, Planning, Finance and the City's Clerk. Some departments, such as the Lake Department and Public Works, are located nearby. These facilities are open to the public Monday through Thursday, from 8:00 a.m. to 5:00 p.m., and Friday, from 8:00 a.m. to 4:00 p.m.

3.15.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.15.4.1 Federal Policies and Regulations

There are no federal policies related to public services applicable to the proposed Project.

3.15.4.2 State Policies and Regulations

Assembly Bills 2926, 1600, and 2751. To assist in providing facilities to serve students generated from new development projects, the State enacted Assembly Bill (AB) 2926 in 1986, which allows school districts to collect impact fees from developers of new residential, commercial, and industrial developments. Development impact fees (DIFs) are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of the costs for the construction, modernization, or reconstruction of school facilities. Subsequent legislation has modified the fee structure and general guidelines. In 1987, the provisions of AB 2926 have been expanded and revised by AB 1600, which limits the ability of a school district to levy school fees unless (i) there is a need for the school fee revenues generated, and (ii) there is a nexus or relationship between the need for school fee revenues and the type of development project on which the school fee is imposed. (The requirements of AB 1600 were clarified with the passage in 2006 of AB 2751, which codifies the findings of *Shapell Industries v. Milpitas Unified School District*).

Senate Bill 50 and California Education Code Section 17620. Senate Bill (SB) 50, the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. It is a program for funding school facilities largely based on matching funds. The approval of Proposition 1A authorized funds for SB 50 in the amount of $9.2 billion, including grants for construction of new schools and modernization of existing schools. The new construction grant provides funding on a 50/50 State and local match basis.

The modernization grant provides funding on a 60/40 State and local match basis. Districts that are unable to provide some or all of the local match requirements and are able to meet financial hardship provisions may be eligible for additional State funding. SB 50 (codified as California Education Code Section 17620) allows school districts to levy a fee, charge, dedication, or other requirement against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. The maximum fee amount that school districts can assess is limited by statutes provided in California Government Code Section 65995.

The payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant (see California Government Code Section 65996). Stated another way, the provisions of SB 50 provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws. The California Department of Education permits local school districts to increase facility fees subject to Department of Education review and with approval of a nexus study from the school district that demonstrates that costs incurred by the school district for the provision of school facilities and services are higher than Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between the increase proposed by the local school district and the actual cost of provision of school facilities and services.

California Building Code Title 24. Title 24 of the California Code of Regulations (CCR), also known as the California Building Code (CBC or Title 24), contains the design standards that govern the construction of buildings in California to "safeguard life or limb, health, property, and public welfare by regulation and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment." The 2022 Edition of the CBC contains general building design and construction requirements relating to fire and life safety, structural safety, and access compliance. CBC provisions provide minimum standards to safeguard life or limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all buildings and structures and certain equipment. The 2022 CBC became effective January 1, 2023, and consists of 12 parts. Part 2 of the CBC outlines building design and construction requirements relating to fire, life safety, and structural safety.

California Fire Code. The California Fire Code (CFC) includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Several fire safety requirements include the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas.

California Code of Regulations Title 14: Natural Resources. CCR Title 14, Division 1.5 (Department of Forestry and Fire Protection), establishes the regulatory framework for CAL FIRE and details a variety of wildfire preparedness, prevention, and response regulations. Title 14 §1280 provides official definitions for LRA, SRA, and VHFHSZ.

Office of Emergency Services. The State of California passed legislation authorizing the Office of Emergency Services to prepare a Standard Emergency Management System (SEMS) program, which

sets forth measures by which a jurisdiction should handle emergency disasters. Noncompliance with SEMS could result in the State withholding disaster relief from the noncomplying jurisdiction in the event of an emergency disaster.

Quimby Act of 1975. The Quimby Act (California Government Code Section 66477) allows the legislative body of a city or county to require by ordinance the dedication of land, the payment of an in-lieu park fee, or a combination thereof, for the approval for a final tract or parcel map. In cases where such dedication or park fee is not obtained through a map, they may be imposed when building permits are issued. The following conditions must be met to comply with the Quimby Act:

- The city or county ordinance must include definitive standards for determining the proportion of a subdivision to be dedicated and the amount of any fee to be paid in lieu thereof.

The legislative body must adopt a general plan containing a recreation element, and any proposed park or recreational facility must be consistent with the principles and standards established in the element.

3.15.4.3 Regional Policies and Regulations

There are no regional policies or regulations related to public services applicable to the Project.

3.15.4.4 Local Policies and Regulations

Lake Elsinore Municipal Code – Title 8, Chapter 8.40 Chapter 8.40 (Parks and Beaches) of the Lake Elsinore Municipal Code establishes the hours of operation of all City parks and beaches. It also sets regulations and/or prohibitions regarding alcohol, vehicles, dogs, golf, open fires, firearms and archery, littering, swimming, boat and jet ski launching, and fishing. This chapter also establishes an annual pass program and a private property boat launch program.

Lake Elsinore Municipal Code – Title 16, Chapter 16.12 and Chapter 16.34. Title 16 of the Lake Elsinore Municipal Code sets rules, regulations, and specifications to control the division of land within the City. Through Section 16.12.060, the City Council reserves the right to set aside portions of a proposed land division for public schools and other public buildings, other than park and recreational facilities, that will be required for the population intended to occupy the land division under the plan of proposed property uses therein and for the general public. Section 16.34.060 in Chapter 16.34 (Required Improvements) requires that prior to the issuance of a building permit, the applicant pay fees for the purposes set forth in that section. Paragraph B of Section 16.34.060 describes the City's Library Mitigation Fee and states that "Upon the recommendation of the Community Services Director and the concurrence of the City Manager, an in-lieu fee for future construction of library improvements shall be paid to the City of Lake Elsinore to assure the necessary library facilities are provided the community. Such facilities are to meet the Riverside City/County Library standards. An in-lieu fee as established by resolution shall be paid to the City at the time of building permit issuance. That amount shall be determined by the Community Services Director and transmitted to the Community Development Department for collection."

Lake Elsinore Municipal Code – Title 16, Chapter 16.12, 16.34, and 16.74. Title 16 of the Lake Elsinore Municipal Code sets rules, regulations, and specifications to control the division of land within the

City. Section 16.12.050 of this chapter addresses deals with park and recreation facilities and states that the "land divider shall either dedicate land or pay a fee in lieu thereof, or a combination of the tow, at the option of the City, for park or recreational ordinance." Section 16.34.060 in Chapter 16.34 (Required Improvements) requires that prior to the issuance of a building permit, the applicant pay fees for the purposes set forth in that section. Paragraph D of Section 16.34.060 describes the City's Park Capital Improvement Fund and states that "For the purpose of purchasing the land and developing and maintaining the City's park system, the City Council shall have the option to request dedication for park purposes or in lieu thereof, request that the applicant pay a fee in accordance with the resolution setting said fee."

The purpose and intent of the Chapter 16.74 of the City of Lake Elsinore Municipal Code is to establish a "program for the adoption and administration of development impact fees by the City for the benefit of citizens whereby as a condition to the issuance of a building permit or certificate of occupancy by the City the property owner or land developer will be required to pay development fees or provide other consideration to the City for the purpose of defraying the costs of public expenditures for capital improvements (and operational services to the extent allowed by the law) which will benefit such development" (Section 16.74.048).

This chapter establishes an "animal shelter facilities fee" (Section 16.74.048) to mitigate the additional burdens created by new development for animal facilities and a "fire facilities fee" (16.74.049) to mitigate the additional burdens created by new development for City fire facilities.

Lake Elsinore General Plan The City's General Plan addresses public services in Chapter 2.0 (Community Form) and Chapter 3.0 (Public Safety and Welfare) and includes the following goals and policies related to public services that are applicable to the proposed Project:

- **Goal 1:** Create a Diverse and integrated balance of residential, commercial, industrial, recreational, public and open space land uses.
    - **Policy 1.1**: Promote innovative site design, and encourage the preservation of unique natural features, such as steep slopes, watercourses, canyons, ridgelines, rock formations, and open space with recreational opportunities.
- **Goal 8:** Provide efficient and effective public safety services for the community.
    - **Policy 8.1:** Continue to follow Riverside County Fire Department most current guidelines to achieve standard response times and staffing levels.
    - **Policy 8.2:** Coordinate with the County of Riverside to provide adequate police service and staffing levels.

3.15.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Thresholds of Significance.* Based on these thresholds, implementation of the proposed Project would have a significant adverse impact related to public services if it would:

Threshold 3.15.1: 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: (i) fire service; (ii) police protection; (iii) schools; (iv) parks; or (v) other public facilities.

3.15.6 Project Impacts

Threshold 3.15.1: **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: (i) fire service; (ii) police protection; (iii) schools; (iv) parks; or (v) other public facilities?**

Less Than Significant

Fire Service. Impacts to fire protection services are considered significant if an increase in population or building area would result in inadequate response times or other performance objectives for fire protection, and/or increased demand for services that would require construction or expansion of new fire protection facilities that could result in an impact on the environment. The following analyzes construction and operation-related impacts to fire protection services that could occur with implementation of the proposed Project.

Construction. Construction activities, including proposed improvements to segments of Nichols Road, Pierce Street, and Baker Street, have the potential to affect fire protection services, including emergency vehicle response times, by temporarily requiring partial lane closures, reducing roadway capacity, or increasing congestion. As described in Section 3.17, Transportation, of this Draft EIR, the construction contractor would be required to prepare and implement a Traffic Management Plan (TMP) (**Regulatory Compliance Measure [RCM] TRA-1**) to be reviewed and approved by City staff. The TMP would be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook*[16] and would include provisions to maintain traffic flow along Nichols Road, Pierce Street, and Baker Street; safe access into and out of the Project site; and emergency access to the Project site and adjacent areas during construction. Implementation of the TMP would ensure that emergency vehicles and emergency service providers (i.e., RCFD personnel) are notified of any temporary lane closures in advance and can plan for adequate navigation to the Project site and within the Project area. Traffic management personnel (flag persons), required as part of the TMP would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. If partial lane closures are required, notice would be provided to the RCFD, and flag persons would be used

[16] California Inter-Utility Coordinating Committee. 2018. California Temporary Traffic Control Handbook, 7th Edition. May.

to facilitate the traffic flow until construction is complete. With the implementation of **RCM TRA-1**, potential impacts related to emergency access during construction of the proposed Project would not be impeded.

Construction of the proposed Project could also increase the potential for accidental on-site fires from the operation of construction equipment, the use of flammable construction materials, and sparking during the removal of any existing on-site vegetation. As required by the California Occupational Safety and Health Administration (Cal/OSHA) and Fire and Building Code requirements, the construction contractor would be required to carefully store flammable materials in appropriate containers during Project construction, use construction equipment with spark arrestors, and immediately and completely clean up spills of flammable materials when they occur. In addition, as specified in the conditions of the site-specific Fire Protection Plan (FPP) (Appendix P to this Draft EIR), prior to bringing lumber or combustible materials onto the Project site, improvements within the active development area must be in place (including utilities, operable fire hydrants, and approved temporary roadway surfaces), and construction-phase fuel modification zones must be established. Pursuant to **RCM FIRE-2**, the proposed Project would be required to adhere to these conditions. Furthermore, the construction contractor and construction personnel would be familiar with the FPP and trained in emergency response, and fire suppression equipment specific to the construction site would be available and maintained on site for the duration of the construction period. Adherence to the FPP, as required under **RCM FIRE-2**, and existing laws would ensure that the Project site is adequately served by fire protection services during construction.

As such, impacts to fire protection, emergency medical services, and RCFD response times would be minimized during construction. Construction of the proposed Project would not require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities or infrastructure, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Impacts would be less than significant, and mitigation is not required.

Operation. General and emergency access to the Onsite Development Area would be provided via Pierce Street and Baker Street via Nichols Road. The Onsite Development Area would be accessible via four new driveways, including three along Baker Street and one along Pierce Street. Building 1 would be accessible via one passenger vehicle driveway along Pierce Street and one 53-foot truck access driveway along Baker Street. Building 2 would be accessible via two 50-foot driveways along Baker Street that would be used by passenger vehicles and trucks. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed behind the rear of Building 2 that would extend to Building 1 for access to Pierce Street. The reciprocal access agreement would largely be intended to provide a secondary point of emergency access for Building 2.

The proposed Project would include improvements to segments of Nichols Road, Pierce Street, and Baker Street. These improvements include paving Baker Street along the frontage of the Onsite Development Area and connecting Baker Street to Nichols Road, as well as paving Pierce Street from Nichols Road toward the southwest to connect to Hoff Avenue, to

improve traffic circulation in the Project vicinity and create a second means of emergency access. These improvements would achieve the full build out of Baker Street and Pierce Street, consistent with the City's General Plan. All roadways within the Project site would be developed in accordance with applicable City and RCFD ordinances and codes related to emergency access standards, including those in the RCFD Fire Code and the 2022 CFC. Compliance with applicable ordinances and codes would ensure adequate access to, from, and within the Project site for emergency vehicles during operation of the proposed Project. Water availability, fire water flow, and hydrant placement throughout the proposed Project would be reviewed and verified by the RCFD to ensure compliance with local and State codes. Additionally, fire protection measures specified in **RCM PS-1** would be required for the proposed Project in accordance with Riverside County ordinances and/or recognized fire protection standards. As previously stated, the proposed Project would be required to adhere to the site-specific FPP, as specified in **RCM FIRE-2,** including measures such as the use of ignition-resistant construction materials, installation of fire sprinkler systems, and inclusion of Fuel Modification Zones.

According to the FPP prepared for the proposed Project (Appendix P to this Draft EIR), the proposed warehouses within the Onsite Development Area are anticipated to directly employ approximately 483 individuals.[17] Assuming staggered shifts, approximately 376 persons are estimated to be present on the Project site at any given time. Using RCFD's estimated call volumes and analyzing a worst-case scenario, the proposed Project's estimated working population at any given time is calculated to generate up to 30 calls per year (approximately 2.5 calls per month), most of which are anticipated to be medical-related calls.

In 2022, Rosetta Canyon Station No. 97 responded to approximately 1,700 incidents, for an average of approximately 142 calls per month. That same year, McVicker Park Station No. 85 responded to approximately 2,300 incidents, for an average of approximately 192 calls per month.

Accordingly, the worst-case scenario of 2.5 calls per month by the Project would represent minimal contributions of approximately 1.7 percent[18] and 1.3 percent[19] to the monthly call volumes of Rosetta Canyon Station No. 97 and McVicker Park Station No. 85, respectively. This level of service demand would not substantially raise the overall call volume within the overall context of nearby fire stations and therefore would not result in a significant impact.

The FPP (Appendix P to this Draft EIR) also included an analysis of emergency response times from the RCFD fire stations most likely to respond to an emergency at the Project site. According to calculations presented in the FPP, if a wildfire were to occur, Rosetta Canyon Station No. 97 and McVicker Park Station No. 85 could respond to the nearest Onsite Development Area entrance within approximately 8.51 minutes under the Speed Limit

[17] Dudek. 2025. *Fire Protection Plan Baker Industrial Project.* November.
[18] (2.5 ÷ 142) × 100 = approximately 1.7 percent
[19] (2.5 ÷ 192) × 100 = approximately 1.3 percent

Formula and 9.11 minutes under the Insurance Services Office (ISO) formula.[20] As such, RCFD's response times to an emergency at the Project site or in the Project vicinity, as modeled using the Speed Limit Method, would not fully conform to applicable RCFD response time standards as they would exceed RCFD's 6-minute first-in response time goal, which includes travel time, dispatch time, and turnout time.

While emergency response times from the closest responding stations would exceed applicable RCFD response time standards, the proposed Project would include a variety of Project design features to reduce the potential for wildfire spread prior to the arrival of emergency response teams. Relevant Project design features include Type 1 (Fire Resistive) tilt-up construction materials, installation of an NFPA 13 commercial interior fire sprinkler system, and minimum 100-foot on-site and off-site equivalent fuel modification. Further, the proposed Project would also provide funding to support the provision of additional fire response infrastructure pursuant to the Fire Facilities Fee requirement set forth in Section 16.74.049 of the City of Lake Elsinore Municipal Code. Pursuant to **RCM PS-2**, the Project Applicant would pay DIFs related to fire facilities, fulfilling its requirement to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, and other performance objectives for the City and the Project site. In addition, the Project Applicant would enter into a development agreement with the City and RCFD/CAL FIRE, under which the Project Applicant would provide additional funding to the City for a future fire station or other infrastructure in closer proximity to the Project site to maintain adequate service ratios, response times, and other performance objectives.

With implementation of **RCM PS-1**, **RCM PS-2**, **RCM TRA-1**, and **RCM FIRE-2**, the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, or the need for new or physically altered fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection. Impacts would be less than significant, and mitigation is not required.

Police Protection. As discussed above, the Project site is currently vacant and is within the service area of the LEPD. The LEPD/Sheriff's Station that would serve the Project site is located at 333 Limited Street, approximately 2.9 miles southeast of the Project site. The average response times from this station as of 2023 are 7.25 minutes for Priority 1 calls, 18.55 minutes for Priority 2 calls, 34.44 minutes for Priority 3 calls, and 46.96 minutes for Priority 4 calls. The following analysis considers the potential impacts of the proposed Project on law enforcement services in the city during construction and operation.

Construction activities, including ROW improvements on Baker Street and Pierce Street and the realignment of Baker Street to Nichols Road, have the potential to affect law enforcement services, such as emergency vehicle response times, by potentially requiring temporary lane

[20] The Insurance Services Office (ISO) response travel time formula discounts speed for intersections, vehicle deceleration, and acceleration, and does not include turnout time. Because applicable response travel time standards discussed in this analysis include travel time, dispatch time, and turnout time, the ISO response travel time speeds are presented in the Fire Protection Plan (Dudek 2025) for comparative purposes only.

closures. However, the Construction Contractor would maintain traffic flow on these streets, safe access into and out of the Project site, and emergency access to the Project site and adjacent areas during construction, consistent with the recommendations of the *California Temporary Traffic Control Handbook.* Implementation of these measures would ensure that emergency vehicles and emergency service providers (i.e., law enforcement) are notified of any detours or lane closures in advance and can plan for adequate navigation to the Project site. Traffic management personnel (flag persons) would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with law enforcement vehicle access. If temporary lane closures are required, notice would be provided to LEPD, and flag persons would be used to facilitate the traffic flow until construction is complete.

Active construction sites are often vulnerable to criminal activity during nonconstruction hours due to construction equipment and vehicles with gasoline and diesel fuel staged on site, as well as unsecured construction materials. To minimize trespassing, the Project would incorporate temporary security measures, including security fencing and lighting around the Project site and locking of access points during nonconstruction hours. Construction equipment would be stored in well-lit areas and smaller equipment would be locked in secure containers. Therefore, potential short-term construction impacts to police protection services during construction would be **less than significant**, and mitigation is not required.

The proposed Project, which includes the construction of two new warehouse facilities and the generation of 483 new permanent employees, could increase law enforcement calls for service to the Onsite Development Area during operation compared to existing conditions with added traffic associated with workers commuting to the site, haul routes, deliveries, and other Project-related activities. However, such calls would be similar to the types of calls the LEPD responds to at similar industrial developments in the city. The Project does not involve a residential component; however, because the site is undeveloped under existing conditions, the Project would be expected to somewhat increase the frequency of calls to LEPD. Nevertheless, the proposed Project would implement Crime Prevention through Environmental Design (CPTED) techniques that would discourage and or reduce crime from occurring on site. Such CPTED techniques would include, but not be limited to: surface drive aisle lighting, alarms and security cameras, building façade lighting, building entries, parking areas, sufficient lighting of walkways to facilitate safe pedestrian movement, low-lying landscaping designed to minimize opportunities for concealment, continued maintenance activities on the site, deadbolts/locks on building exterior doors, and perimeter retaining walls. In addition, as detailed in Section 3.14, Population and Housing, implementation of the proposed Project is consistent with planned growth within the city and would not induce substantial population growth in the city or region. Therefore, the proposed Project's increase in demand of new or expanded police services would be negligible.

Pursuant to Chapter 16.74 (Development Impact Fees) of the City's Municipal Code, as a condition of the proposed Project specified below in **RCM PS-2**, the Project Applicant would pay a DIF to the City to offset the costs of increased personnel or equipment that could be required to maintain acceptable service ratios, response times, and other performance objectives. The DIF paid would increase capital funding to mitigate impacts of new development on the level of service capacity

in existing facilities. Therefore, the proposed Project would be required to pay its share of DIF to the City.

Since the Project would result in a negligible increase in City population, is consistent with the City's General Plan, and would pay applicable DIFs, the proposed Project would not degrade the LEPD's performance such that a new facility or expansion of an existing facility, the construction of which could cause significant environmental impacts, would be needed. Any future construction of new or expansion of existing police protection facilities would be subject to Project-level environmental review and site-specific mitigation as appropriate in order to ensure significant environmental impacts are avoided or mitigated at the time such development actions are proposed to or by the City. Impacts would be **less than significant**, and no mitigation is required.

Schools. The Project site is within the LEUSD's boundary. The following analysis considers the potential impacts of the proposed Project on school services in the city during construction and operation.

Construction of the proposed Project would create temporary employment opportunities within the city. It is anticipated that the majority of construction-related employees would come from within the city or nearby surrounding county areas. As such, school-aged children of any potential construction-related employee would already be enrolled in LEUSD or other area schools. Given the duration of construction, it is not anticipated that construction-related employees would relocate to the city as a result of employment; therefore, construction of the proposed Project is not anticipated to result in the addition of new students to LEUSD. **No impact** to school services would occur during construction, and no mitigation is required.

As discussed in Section 3.14, Population and Housing, the proposed Project would not generate new housing, and the additional 483 permanent warehouse employees would not generate a substantial increase in population within the city. In addition, because future employees of the proposed Project are anticipated to come from the city and the immediate surrounding area, children of new employees are expected to already attend schools within LEUSD. Therefore, the increased on-site population within the Onsite Development Area would not substantially increase demand on schools, and there would not be a need for new or expanded school facilities. Impacts would be **less than significant**, and no mitigation is required.

Parks. The nearest park to the Project site is Alberhill Ranch Community Park, located at 28200 Lake Street, approximately 0.6 mile northwest of the Project site. The following analysis considers the potential impacts of the proposed Project on parks in the city during construction and operation.

As described above, construction of the proposed Project would create temporary employment opportunities within the city. It is anticipated that the majority of construction-related employees would come from within the city or surrounding county areas, and that these existing residents already use park facilities within the city and county. Given the duration of construction, it is not anticipated that construction-related employees would relocate to the city as a result of employment. Therefore, construction of the proposed Project is not anticipated to result in an

increased use of city park facilities. **No impact** to parks would occur during construction, and no mitigation is required.

The proposed Project would generate 483 new permanent warehouse employees, but it does not propose a residential component. As discussed in Section 3.14, Population and Housing, implementation of the proposed Project would not generate a substantial increase in population within the city. In addition, future employees within the Onsite Development Area would not be expected to use parks or recreational facilities in the vicinity of the Project site during Project operation. Further, because future employees are expected to come from the city or the immediate surrounding area, they are expected to already use city parks and recreational facilities. Therefore, the increase in on-site population within the Onsite Development Area would not substantially increase demand on parks and recreational facilities, and there would not be a need for new or expanded park facilities. Section 3.16, Recreation, provides further discussion of impacts to parks and recreational facilities. Impacts would be **less than significant**, and no mitigation is required.

Other Public Facilities. Implementation of the proposed Project would develop a vacant site into a site with two warehouses. The following analysis considers the potential impacts of the proposed Project on other public facilities in the city and county, such as libraries, animal control facilities, public works departments, and City Hall, during construction and operation.

As described above, construction of the proposed Project would create temporary employment opportunities within the city. It is anticipated that the majority of construction-related employees would come from within the city or surrounding county areas, and that these existing city and county residents already use other public facilities, such as libraries, animal control, public works departments, and City Hall. Given the duration of construction, it is not anticipated that construction-related employees would relocate to the city as a result of employment. Therefore, construction of the proposed Project is not anticipated to result in an increased use of other city public facilities. **No impact** would occur during construction, and no mitigation is required.

As discussed in Section 3.14, Population and Housing, the proposed Project would not induce substantial population growth in the city or region. The proposed Project is expected to generate 483 new permanent warehouse employees, who are expected to come from the city or immediate surrounding area. It is expected that future employees already use city public facilities such as the RCLS, animal control services, and City Hall. Pursuant to Chapter 16.74 (Development Impact Fees) of the City's Municipal Code, the Project applicant would pay a DIF to the City as a condition of the Project (RCM PS-2). The DIF would increase capital funding to mitigate impacts of new development on the level of service capacity in existing facilities. DIFs identified as a "City Hall and public works facilities fee" and "animal shelter facilities fee" will be imposed on the proposed Project to mitigate the additional burdens created by new development to the City's public facilities. Impacts would be less than significant, and no mitigation is required.

As provided above, construction and operation of the proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the 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, including fire service, police protection, schools, parks, or other public facilities with payment of appropriate DIFs (**RCM PS-2**). Impacts would be **less than significant**, and no mitigation is required.

3.15.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts related to public services.

3.15.8 Regulatory Compliance Measures and Mitigation Measures

The following regulatory compliance measures are applicable to the proposed Project.

RCM PS-1 **Regulatory Fire Protection Measures.** In accordance with County of Riverside (County) ordinances and/or recognized fire protection standards, prior to the issuance of building permits, the Project Applicant shall provide documentation to the Director of the City of Lake Elsinore Building Department, or designee, that the following fire protection measures have been incorporated into the proposed Project plans:

1. **Fire Protection Water Supplies/Fire Flow:** Minimum fire flow for the construction of all buildings is required per California Fire Code (CFC) Appendix B. Prior to building permit issuance for new construction, the Applicant shall provide documentation to show there exists a water system capable of delivering the required fire flow. Specific design features may increase or decrease the required fire flow. Refer to CFC 507.3.

2. **Fire Protection Water Supplies/Hydrants:** The minimum number of fire hydrants required, as well as the location and spacing of fire hydrants, shall comply with CFC Appendix C and National Fire Protection Association (NFPA) 24. Fire hydrants shall be located no more than 400 feet from all portions of the exterior of the building along an approved route on a fire apparatus access road, unless otherwise approved by the Riverside County Fire Department (RCFD). Fire hydrants shall be at least 40 feet from the building they are serving. A fire hydrant shall be located within 20 to 100 feet of the RCFD connection for buildings protected with a fire sprinkler system. The size and number of outlets required for the approved fire hydrants are 4" x 2 ½" x 2 ½" (super hydrant). Refer to CFC 507.5, CFC Appendix C, and NFPA 24.

3. **Fire Department Access:** Fire apparatus access roads shall be provided to within 150 feet of all exterior portions of buildings unless otherwise approved by the RCFD. Fire apparatus access roads shall have an unobstructed width of no less than 24 feet. Dead-end fire apparatus access roads in excess of 150 feet shall be provided with an approved turnaround. The minimum required turning radii of a fire apparatus access road are 38 feet outside radius and 14 feet inside radius. The

construction of the fire apparatus access roads shall be all-weather and capable of sustaining 75,000 pounds. Unless otherwise approved, the grade of a fire apparatus access road shall not exceed 16 percent and the cross slope shall not exceed 2.5 percent. The angles of approach and departure for fire apparatus access roads shall be a maximum of 6 percent grade change for 25 feet of approach/departure. Refer to CFC 503.1.1, 503.2.1, as amended by the County, and Riverside County Office of the Fire Marshal Technical Policy #TP22-002.4.

4. **Fire Department Access Turnaround:** Dead-end fire apparatus access roads in excess of 150 feet in length shall be provided with a bulb turnaround at the terminus measuring a minimum of 38 feet outside radius and 14 feet inside radius. Parallel parking around the perimeter of the bulb is acceptable provided the bulb's outside turning radius is increased by 8 feet. In lieu of a bulb, a hammerhead-type turnaround is acceptable where the top of the "T" dimension is 120 feet with the stem in the center. Additional turnaround designs may be acceptable as approved by the RCFD. Refer to CFC 503.1.1, 503.2.1, as amended by the County, and Riverside County Office of the Fire Marshal Technical Policy #TP22-002.

5. **Secondary Access:** Unless otherwise approved by the RCFD, dead-end fire apparatus access roads shall not exceed 1,320 feet. Secondary egress/access fire apparatus access roads shall provide independent egress/access from/to the area or as otherwise approved by the RCFD. Secondary egress/access fire apparatus access roads shall be as remote as possible from the primary fire apparatus access road to reduce the possibility that both routes will be obstructed by a single emergency. Additional fire apparatus access roads based on the potential for impairment by vehicle congestion, condition of terrain, climatic conditions, anticipated magnitude of a potential incident, or other factors that could limit access may be required by the RCFD. Refer to CFC 503.1.2 and Riverside County Office of the Fire Marshal Technical Policy #TP22-002.

6. **Fire Department Building Construction Plan Review:** Submittal of construction plans to the RCFD will be required. Final fire and life safety conditions will be addressed when the RCFD reviews the plans. These conditions shall be necessary, reasonable, and based exclusively on the CFC, California Building Code (CBC), and related codes/standards adopted at the time of construction plan submittal. Refer to CFC 105.1.

7. **Fire Sprinkler System:** All new commercial buildings and structures 3,600 square feet or larger will be required to install a fire sprinkler system. Refer to CFC 903.2, as amended by the County.

8. **Fire Alarm and Detection System:** A water flow monitoring system and/or fire alarm system may be required as determined at the time of building construction plan review. Refer to CFC 903.4 and CFC 907.2.

9. **Traffic Calming Devices:** Requests for the installation of traffic calming designs/devices on fire apparatus access roads shall be submitted and approved by the Fire Code Official. Refer to CFC 503.4.1.

10. **Gate Access:** All electronically operated gates shall be provided with Knox key switches and automatic sensors for access. These gates shall be provided with access to gate equipment or another method to open the gate if there is a power failure. (Manual gates shall not be locked unless a Knox Box containing the key to the lock is installed in an approved location on the approach side of the gate). A pedestrian gate, if used to provide access, shall be a minimum of 3 feet wide and provided with a Knox Box/padlock if locked. Refer to CFC 506.1.

11. **Fire Department Access Doors:** If high-piled storage will be utilized in the building, RCFD access doors may be required every 150 feet along all portions of the interior of the building that are along the fire apparatus access road. Refer to CFC 3206.7.

12. **Dock Loading:** Dock loading shall not impede RCFD access lanes.

13. **Addressing:** All commercial buildings shall display street numbers in a prominent location on the address side and additional locations as required. Refer to CFC 505.1 and County of Riverside Office of the Fire Marshal Standard #07-01.

14. **Water Plans:** The Applicant/developer shall furnish the water system fire hydrant plans to the RCFD for review and approval prior to building permit issuance. Plans shall be signed by a registered civil engineer and shall confirm hydrant type, location, spacing, and minimum fire flow. Once plans are signed and approved by the local water authority, the originals shall be presented to the RCFD for review and approval. Refer to CFC 105.4.1.

15. **Emergency Responder Communication Coverage Systems:** Projects that do not meet the exceptions set forth by the Riverside County Office of the Fire Marshal shall provide plans for an emergency responder radio coverage system. Refer to CFC 510.1 and Riverside County Office of the Fire Marshal Technical Policy #TP19-002.

RCM PS-2: **Development Impact Fees, Chapter 16.74 of the City of Lake Elsinore Municipal Code.** Prior to the issuance of a certificate of occupancy by the City of Lake Elsinore Building Department, the most current Development Impact

Fee (DIF) for commercial and industrial development shall be paid by the developer as calculated by the City. The building permits shall be issued by the City after proof of the appropriate DIF is paid.

RCM TRA-1 **Transportation Management Plan.** (See Section 3.17, Transportation)

RCM FIRE-2 **Adherence to the Fire Protection Plan.** (See Section 3.20, Wildfire)

The proposed Project would not result in any significant adverse impacts related to public services, and no mitigation would be required.

3.15.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed Project related to public services. No mitigation is required.

3.15.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for public services. The cumulative impact area for public services is the city and respective service areas.

The need for new and/or maintenance of existing public services and associated facilities is measured by service area population, or the number of residents and workers within the City of Lake Elsinore's service area, as well as the type and density of development. As additional development occurs in the city, there may be an overall increase in the demand for fire protection and law enforcement services, including personnel, equipment, and/or facilities. Increases in demand are routinely assessed by these agencies as part of the annual monitoring and budgeting process. The proposed Project would result in the development of uses that are typical of those currently present in the service area for the LEPD and RCFD and would not result in a substantially increased service population for either service. Additionally, the Project does not include residential uses or structures anticipated to increase service demand disproportionately beyond what is currently planned for by the City's General Plan. Future development projects in the city would be subject to environmental review and, if applicable, development fees proportional to the scale of development.

3.15.10.1 Fire Protection and/or Police Facilities

As previously stated, the proposed Project would not result in a substantial increase in residents or employees as compared to existing LEPD and RCFD service populations. Further, the proposed Project would include fire suppression and CPTED techniques that would minimize the risk of crime and fire occurring on site, thereby reducing the Project's demand for fire protection and police resources. Fire protection measures specified in **RCM FIRE-2,** including measures such as the use of ignition-resistant construction materials, installation of fire sprinkler systems, and inclusion of Fuel Modification Zones would be implemented by the proposed project and other projects within fire hazard severity zones. In addition, the proposed Project and other development projects within the service areas of the LEPD and RCFD would be required to implement a TMP as codified in **RCM TRA-1** that would include provisions to maintain traffic flow along adjacent roadways; safe access into and out of project sites;

and emergency access to project sites and adjacent areas during construction. The Project and other development projects within the service areas of the LEPD and RCFD would be required to adhere to conditions established by these agencies that would mitigate potential impacts to fire and policing facilities to a level that is less than cumulatively significant. As detailed in **RCM PS-1** and **RCM PS-2**, the Project includes design features and measures that support a finding that response time standards can be achieved through additional funding that the City has planned and will be supported by this Project and other future projects in the vicinity of the proposed Project. This would include the Project Applicant proposing to pay its required Facility DIF Fees, fulfilling its requirement to fund its share of improvements and maintain adequate fire protection services. Additionally, the Project Applicant would enter into a Development Agreement with the City where the Applicant proposes to contribute funds beyond the requisite DIF fee payment for fire funding to support local fire improvement efforts as outlined in the Project's development agreement and reduce the incremental increase in demands on public services.

3.15.10.2 Schools

The proposed Project is an industrial development Project that would not generate an increase in LEUSD students. Therefore, the proposed Project would not contribute to a cumulatively considerable impact on school services in the LEUSD. In addition, future development projects in the city would be subject to environmental review and would be required to demonstrate that implementation of the Project would not substantially impact school services.

3.15.10.3 Parks

The proposed Project would not substantially impact park facilities and would also not contribute to a cumulatively considerable impact on parks because a significant increase in residents or employees would not occur from the Project. Future development projects in the city would be subject to individual environmental review. In addition, future development projects would be required to pay appropriate DIFs to offset their incremental albeit cumulative contribution to demand for public services. Therefore, the proposed Project would not result in a cumulatively considerable impact related to parks.

Overall, when considered in conjunction with past, present, and future projects, impacts pertaining to public services would be **less than cumulatively considerable**. Mitigation is not required.

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3.16 RECREATION

This section of the Draft Environmental Impact Report (EIR) describes the parks and recreational facilities in the vicinity of the Project site and within the city of Lake Elsinore, sets forth the relevant regulatory requirements that apply to the analysis of the proposed Project's potential impact on recreational facilities, and evaluates the potential for implementation of the proposed Project to impact those facilities. This section is based, in part, on information provided in Chapter 2.0, Community Form, of the City of Lake Elsinore (City) General Plan, the City of Lake Elsinore General Plan EIR, the City of Lake Elsinore Parks and Recreation Master Plan, and applicable provisions of the City of Lake Elsinore Municipal Code.

3.16.1 Scoping Process

Potential impacts to recreation were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received no comments in response to the Notice of Preparation (NOP), which was circulated between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to recreation. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this EIR.

3.16.2 Methodology

Impacts to recreational facilities were assessed based on the potential for the proposed Project's employees to generate increased demand on recreational facilities that could result in deterioration of, or contribute toward substantial accelerated deterioration of, those facilities or require the construction of new facilities or expansion of existing facilities that could have an adverse physical effect on the environment. For the purposes of this analysis, "recreational facilities" are defined as parks and designated public areas used for active or passive recreation.

While this section analyzes the potential increase in the on-site population resulting from Project employment and the related impacts to recreational facilities in the Project site vicinity, it also analyzes the City's overall population increase as a result of Project employment, as well as potential impacts to overall City parkland metrics. Chapter 2.0, Community Form, of the City's General Plan also states the following standard for acreage of parkland and recreation facilities: "Policy 8.2: Ensure parkland and recreation facilities support new development through acquisition and/or dedication. Meet the requirement of the Park Capital Improvement Fund, Resolution No. 91-42 and the Quimby Act by acquiring five (5) acres of useable park land per 1,000 population."[1]

3.16.3 Existing Environmental Setting

The Project site is located in the city of Lake Elsinore, Riverside County, California. This section discusses recreational facilities within the city and in the vicinity of the Project site.

Historically, Lake Elsinore has been regarded as a recreational destination for the Inland Empire because of the city's natural resources, such as the lake, mountains, and rugged hillsides. There are currently 20 City-owned and operated public parks and 5 City-owned and operated recreation

[1] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, Policy 8.2. December 13.

facilities within Lake Elsinore, totaling more than 120 acres of parkland.[2] Each park has a unique set of features, with a variety of passive and active recreation. These features include fields for baseball, softball, football, and soccer; play equipment; picnic areas; barbeque facilities; drinking fountains; tennis courts; dog parks; and grass for passive recreation. In addition, the City partners with the Lake Elsinore School District to allow joint use of facilities where possible, such as active recreational ball fields, playgrounds, or outdoor multi-use areas that can be shared.[3] The approximately 3,000-acre Lake Elsinore, which is owned and managed by the City, also offers opportunities for lake sports, including boating, wakeboarding, parasailing, fishing, water skiing, jet skiing, and windsurfing.

The approximately 140.04-acre project site consists of undeveloped land and public road rights-of-way (ROWs). As the Project site is undeveloped, it does not currently generate any demand on existing recreational facilities and no official recreational facilities currently exist on the Project site. The nearest public park or recreation facility to the Project site is Alberhill Ranch Community Park, located at 28200 Lake Street, approximately 0.6 mile northwest of the Project site. The nearest public recreation facility to the Project site is Sharron Lindsay Community Center and Gym, located at 29291 Lake Street, approximately 1.2 miles southwest of the Project site. Other parks within 2 miles of the Project site include: Summerlake Park, located at 900 Broadway Avenue, approximately 1.3 miles southwest of the Project site; Machado Park, located at 15150 Joy Street, approximately 1.3 miles southwest of the Project site; Lincoln Street Park, located at 14986 Lincoln Avenue, approximately 1.7 miles southwest of the Project site; and Rosetta Canyon Community Park, located at 39423 Ardenwood Way, approximately 1.8 miles east of the Project site.[4]

3.16.4 Regulatory Setting

This section includes applicable federal, State, regional, and City regulations.

3.16.4.1 Federal Policies and Regulations

There are no federal regulations regarding parks and recreation applicable to the Project site.

3.16.4.2 State Policies and Regulations

Quimby Act of 1975. The Quimby Act (California Government Code § 66477) allows the legislative body of a city or county to require by ordinance the dedication of land, the payment of an in-lieu park fee, or a combination thereof, for the approval of a tentative map or parcel map for residential development. In cases where such dedication or park fee is not obtained through a map, they may be imposed when building permits are issued. The following conditions that are relevant a project, must be met to comply with the Quimby Act:

[2] City of Lake Elsinore. Parks & Facilities. Website: https://www.lake-elsinore.org/366/Parks-Facilities (accessed July 11, 2024).
[3] Ibid.
[4] City of Lake Elsinore. Parks Locator Map. Website: https://www.lake-elsinore.org/DocumentCenter/View/2435/Park-Location-Map-PDF?bidId= (accessed July 11, 2024).

- The city or county ordinance must include definitive standards for determining the proportion of a subdivision to be dedicated and the amount of any fee to be paid in lieu thereof.

- The legislative body must adopt a general plan containing a recreation element, and any proposed park or recreational facility must be consistent with the principles and standards established in the element.

3.16.4.3 Regional Policies and Regulations

There are no regional regulations regarding parks and recreation applicable to the Project site.

3.16.4.4 Local Policies and Regulations

City of Lake Elsinore Municipal Code, Chapter 16.74. Establishes the program for the adoption and administration of development impact fees by the City as a condition to the issuance of a building permit or certificate of occupancy by the City. Pursuant to Chapter 16.74, the property owner or land developer shall be required to pay development impact fees or provide other consideration to the City for the purpose of defraying the costs of public expenditures for capital improvements and operational services that will benefit the new development, such as recreational facilities.

City of Lake Elsinore Parks and Recreation Master Plan. The City of Lake Elsinore Parks and Recreation Master Plan[5] provides a guide for orderly development and management of parks and recreational facilities in Lake Elsinore. The plan details existing recreation facilities and programs and includes a needs assessment for recreation facilities as well as recommendations. Opportunity sites for future recreation facilities and parks are also mapped.

City of Lake Elsinore General Plan, Chapter 2.0, Community Form. Section 2.7 of Chapter 2.0 of the City's General Plan describes existing park and recreational facilities within the city. The following goals and policies from this section apply to the proposed Project:

- **Goal 2:** Establish and maintain the City as a year-round recreation destination.
    - **Policy 2.4:** Continue to evaluate the provision of public access to the lake and open space areas when making land use decisions.

- **Goal 8:** Maintain an adequate quantity, quality, type, and distribution of parks and recreational facilities throughout the city that serve the current and future needs of residents and visitors.
    - **Policy 8.2:** Ensure parkland and recreation facilities support new development through acquisition and/or dedication.

[5] City of Lake Elsinore. 2008. Parks and Recreation Master Plan 2008–2030. Website: https://www.lake-elsinore.org/DocumentCenter/View/3149/2009ParksandRecreationMast (accessed July 11, 2024).

3.16.5 Thresholds of Significance

The following thresholds of significance criteria are based on Appendix G of the *State CEQA Thresholds of Significance.* Based on these thresholds, implementation of the proposed Project could have a significant adverse impact related to recreation if it would:

Threshold 3.16.1: Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or

Threshold 3.16.2: Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

3.16.6 Project Impacts

Threshold 3.16.1: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant. The following analysis of potential impacts to parks and recreational facilities is based on the estimated increase in the on-site population and the City's overall population as a result of employment generated by the proposed Project.

As previously stated, there are currently 20 City-owned and operated public parks and 5 City-owned and operated recreation facilities within Lake Elsinore, totaling more than 120 acres of public parkland.[6] According to United States Census Bureau data,[7] as of 2024, the City had a total population of 71,452, which results in a ratio of approximately 1.7 acres per 1,000 residents.[8] The City's General Plan identifies a standard of 5 acres of parkland per 1,000 residents (Policy 8.2).

The proposed Project would develop the Project site with two warehouse buildings with office and office mezzanine spaces, 23.04 acres of off-site improvements, a 33.65-acre restoration area, and a 2.73-acre construction/improvements buffer between Baker Street and the restoration area. The restoration area is intended for restoration and conservation uses only and would not allow any recreational activities. The proposed Project comprises a warehouse/industrial development and would not develop parks or recreation facilities that would help meet recreational demand, nor would it add to the inventory of parks in the city. Further, the proposed Project would be consistent with the General Plan and zoning designations for the Project site and therefore the planned growth of employees in the City and region.

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6 City of Lake Elsinore. Parks & Facilities. Website: https://www.lake-elsinore.org/366/Parks-Facilities (accessed July 11, 2024).

7 United States Census Bureau. Annual Estimates of the Resident Population for Incorporated Places in the United States: April 1, 2020 to July 1, 2024. Website: https://www2.census.gov/programs-surveys/popest/tables/2020-2024/cities/totals/SUB-IP-EST2024-POP-06.xlsx (accessed December 6, 2024).

8 (120 * 1,000) ÷ 71,452 = approximately 1.7 acres per 1,000 residents.

The increase in on-site population with implementation of the proposed Project would be associated with future employees. According to the *Baker and Pierce Street Development Executive Summary of Economic Benefit Analysis Memorandum,* prepared by Development Planning and Financing Group (DPFG), LLC, on January 19, 2024, implementation of the proposed Project would result in the creation of 483 permanent jobs.[9] As stated in Section 3.14, Population and Housing, of this Draft EIR, the City's January 2025 unemployment rate was 5.0 percent,[10] and the County of Riverside (County) had an unemployment rate of 5.3 percent. These unemployment rates suggest an available local and regional labor pool, consisting of individuals actively seeking employment, exists to serve the long-term the Project's employment opportunities. It is unlikely that the proposed Project's labor demand would necessitate a substantial number of employees from outside the region to meet the need for employees resulting from development of the proposed Project. As also discussed in Section 3.14, the proposed 483 new employees would increase the total population of Lake Elsinore by less than 1 percent in the event that all 483 employees move to the city as a result of this employment (which is not anticipated to occur due to the existing residential population in the area and the Project's easily accessible location near Interstate 15). Further, the proposed 483 new employees would not affect the City's existing ratio of approximately 1.7 acres per 1,000 residents[11] in the event that all 483 employees move to the city as a result of this employment. Accordingly, no negative impact related to the City's stated goal of 5.0 acres of parkland for every 1,000 residents would result from the proposed development.

While it is reasonable to assume that future employees of the Project site may spend time utilizing local parks and recreational facilities in the Project site vicinity during lunch breaks or after their shift, employees would be a small portion of the population, and employee use is expected to be minimal within the overall context of community members who currently use these facilities. As discussed above, future employees are expected to come from the labor pool within the city or immediate surrounding area and may represent community members that already utilize City parks and recreational facilities.

As previously discussed, the nearest public park or recreation facility to the Project site is Alberhill Ranch Community Park, located at 28200 Lake Street, approximately 0.6 mile northwest of the Project site. Given that employee breaks would likely be staggered and limited in duration, this usage is anticipated to be minimal. Further, while specific details about the future operation of the warehouse facilities are not currently available, it is likely that some of the employees would conduct delivery and hauling tasks off site that would further reduce the likelihood of recreational facility usage in the Project site vicinity. Therefore, given that 483 employees anticipated for the proposed Project may already utilize parks and recreational facilities in the Project vicinity and that only a fraction of these employees would be likely to use these facilities on a regular basis, the increased on-site population at the Project site would not substantially increase demand on parks and recreational facilities. Further, in the event that all 483 new employees move to the city as a result of employment, the City's

9 Development Planning and Financing Group (DPFG), LLC. 2024. *Baker and Pierce Street Development Executive Summary of Economic Benefit Analysis Memorandum.* January 19.

10 State of California, Employment Development Department. Labor Force and Unemployment Rate for Cities and Census Designated Places. Website: https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html#CCD (accessed March 2025).

11 (120 * 1,000) ÷ 71,935 = approximately 1.7 acres per 1,000 residents.

existing parkland-to-resident ratio would remain stable. Therefore, the need for new or expanded park facilities under the Project would be negligible. As a result, impacts related to increased use of existing park and recreational facilities that could result in physical deterioration would be less than significant.

In addition, pursuant to Chapter 16.74 of the City's Municipal Code, the Project developer would be required to pay development impact fees, which would go toward capital improvements to City-operated recreational facilities within the city. These funds would be used to maintain facilities such as City-operated recreational facilities.

Overall, Project impacts associated with the increase in use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated would be less than significant, and no mitigation is required.

Threshold 3.16.2: Would 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 would develop the Project site with warehouse uses and associated improvements, a restoration area, and a construction/improvements buffer between Baker Street and the restoration area. As discussed above, the proposed Project does not include any recreational facilities. Moreover, the Project would not significantly increase demand on existing parks or recreational facilities in the city because most employees would likely be drawn from the existing local workforce (or the addition to new employees as new residents would not meaningfully change the ratio of parkland to residents) and the Project is consistent with the City's General Plan. Therefore, the Project would not result in impacts that would require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment.

3.16.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts from the Project related to recreation.

3.16.8 Compliance Measures and Mitigation Measures

The following regulatory compliance measure is applicable to the proposed Project.

Regulatory Compliance Measure PS-2: **Development Impact Fees, Chapter 16.74 of the City of Lake Elsinore Municipal Code.** See Section 3.15, Public Services.

The proposed Project would not result in any potentially significant adverse impacts related to recreation, and no mitigation measure would be required.

3.16.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed Project related to recreation. No mitigation is required; therefore, impacts would be less than significant.

3.16.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual Project when viewed in connection with the effects of past, current, and probable future Projects within the cumulative impact area for parks and recreation.[12] Refer to Chapter 3 of this Draft EIR for a list of the cumulative parks and recreation projects listed and shown on Figure 3-1.

The cumulative geographic study area for parks and recreation is the city of Lake Elsinore, as parks and recreational facilities are generally owned and maintained by individual municipalities, though it is possible residents of the city utilize County-owned recreational facilities or recreational facilities located in other cities. Implementation of the proposed Project in combination with the related projects in the city has the potential to increase the city's population and could result in cumulative recreation impacts. However, as detailed previously, because the Project is consistent with the planned industrial uses of the area under the General Plan and because most new employees are expected to be drawn from the local existing workforce, the Project would not result in a substantial increase in residents who would use park and recreational facilities. Further, even if all new employees relocated to the city, the proposed Project would not affect the city's existing ratio of parkland per 1,000 residents. Moreover, any usage by the employees would be sporadic and low intensity as discussed above, thus not contributing to regular usage of the recreation facilities at a cumulative level. In addition, the Project would not develop parks and recreational facilities that could result in a cumulative impact on the environment. Thus, cumulative impacts related to recreation from implementation of the Project would be less than cumulatively significant.

In addition, consistent with the City's Municipal Code requirements, the Project developer would be required to pay development impact fees, which would go toward capital improvements to City-operated recreational facilities within the city. Similar to the proposed Project, other cumulative Projects in the city would be required to demonstrate their level of impact on recreational facilities. Therefore, when considered in conjunction with past, present, and future projects, Project impacts pertaining to recreation would be less than cumulatively considerable.

[12] From California Code of Regulations Title 14, § 15355 – Cumulative Impacts.

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3.17 TRANSPORTATION

This section of the Draft Environmental Impact Report (EIR) discusses the existing transportation conditions in the region, in Lake Elsinore, and in the vicinity of the Project site, and addresses potential impacts to transportation facilities from development of the proposed Project. The analysis in this section is based, in part, on the information provided in the *Scoping Agreement for Traffic Impact Study*[1] and the *Vehicle Miles Traveled (VMT) Screening Analysis Memorandum.*[2] These reports are included as Appendices N-1 and N-2 to this Draft EIR.

Data from the City of Lake Elsinore (City) General Plan, City of Lake Elsinore General Plan EIR, and City of Lake Elsinore Municipal Code are also incorporated into this section.

3.17.1 Scoping Process

Attendees of the public scoping meeting held on August 1, 2024, expressed a general concern for increased traffic that may result from the proposed Project. The City of Lake Elsinore (City) received four comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts related to transportation. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to transportation included comments from the following:

- Armando Veliz, July 5, 2024, expressing concerns regarding traffic congestion and associated emissions.
- Jefrey Ong, July 10, 2024, expressing concerns regarding traffic congestion and strain on existing infrastructure, including roads, emergency services, and safety.
- California Department of Justice's Bureau of Environmental Justice (Christie Vosburg for Rob Bonta), July 17, 2024, expressing concerns regarding the Project's potential impacts on traffic circulation in the Project vicinity.
- Briana Sara and Elliot Ruhland, July 19, 2024, expressing concerns regarding traffic congestion and safety.

3.17.2 Methodology

Trip information was generated for the proposed Project using the Institute of Transportation Engineers (ITE) *Trip Generation Manual* (11th Edition) and other applicable sources used to prepare the *Scoping Agreement for Traffic Impact Study* and the VMT Memorandum, included as Appendices N-1 and N-2, respectively.

Until July 1, 2020, roadway congestion or level of service (LOS) was used as the primary study metric for planning and environmental review of discretionary development projects in California. However,

1 EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024. Appendix N-1.

2 EPD Solutions, Inc. 2024. *Vehicle Miles Traveled (VMT) Screening Analysis Memorandum*. July 8. Appendix N-2.

Senate Bill (SB) 743 required the Governor's Office of Land Use and Climate Innovation (LCI; formerly known as the Governor's Office of Planning and Research [OPR])[3] to establish a new metric for identifying and mitigating transportation impacts pursuant to the California Environmental Quality Act (CEQA) in an effort to meet the State's goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation.

California Public Resources Code (PRC) Section 21099(b) states that, upon certification of the revised guidelines for determining transportation impacts, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA. In SB 743, LCI identified VMT as the required CEQA transportation metric, and beginning July 1, 2020, VMT (not LOS) is the only legally acceptable threshold for transportation-related environmental impacts pursuant to CEQA. Therefore, a discussion and analysis of the proposed Project's LOS impact is not included in this Draft EIR.

VMT is a measurement of the amount and distance that a person drives, accounting for the number of passengers within a vehicle. Many interdependent factors affect the amount and distance a person might drive. In particular, the type of built environment affects how many places a person can access within a given distance, time, and cost, using different ways of travel (e.g., private vehicle, public transit, bicycling, walking). VMT is calculated by multiplying the number of trips generated by a project by the total distance of each of those trips.

Lead agencies have the discretion to set their own thresholds of significance with the goals of the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses.[4] Accordingly, the City has adopted guidelines for VMT analysis to comply with CEQA-required assessments of transportation impacts. The City's *Traffic Impact Analysis Preparation Guide*[5] outlines screening criteria and requirements for VMT assessment of land use projects based on the Western Riverside Council of Governments (WRCOG) *Implementation Pathway Study*,[6] which provides options for both methodologies to forecast projected VMT and VMT screening. As detailed in the City's *Traffic Impact Analysis Preparation Guide,* there are three types of screening that that City can apply to effectively screen projects from project-level assessment. These screening steps are summarized below.

- **Transit Priority Area (TPA) Screening.** A TPA is defined as a half-mile area around an existing major transit stop or an existing stop along a high-quality transit corridor. Projects located within a TPA may be presumed to have a less than significant impact absent substantial evidence to the contrary.

- **Low-VMT Area Screening.** Residential and office projects located within a low-VMT-generating area may be presumed to have a less than significant impact absent substantial evidence to the

[3] Effective July 1, 2024, the Governor's Office of Planning and Research changed its name to the Governor's Office of Land Use and Climate Innovation (LCI).

[4] *CEQA Guidelines* § 15064.7.

[5] City of Lake Elsinore. 2020. *Traffic Impact Analysis Preparation Guide.* June 23. Revised November 14, 2022.

[6] Western Riverside Council of Governments (WRCOG). 2019. WRCOG SB 743 Implementation Pathway Document Package. March.

contrary. In addition, other employment-related and mixed-use 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. To identify if the project is in a low-VMT-generating area, the analyst may review the WRCOG screening tool and apply the appropriate threshold within the tool. Additionally, as noted above, the analyst must identify if the project is consistent with the existing land use within that traffic analysis zone (TAZ) and use professional judgment that there is nothing unique about the project that would otherwise be misrepresented utilizing the data from the travel demand model.

- **Project Type Screening.** Local-serving retail projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary.

Projects not screened through the steps above should complete VMT analysis and forecasting through the latest version of the Riverside County Transportation Model (RIVCOM) to determine if they have a significant VMT impact.

3.17.2.1 VMT Modeling

Based on the City's guidelines, the WRCOG provides a VMT Calculator as an alternative function to mimic the RIVCOM results for VMT analysis on small to medium sized, routine projects. The VMT Calculator notes that larger, complex, or unique projects may require the use of RIVCOM or other data and methodology to more accurately capture the potential VMT generated by a project. Conversely, routine projects that are simple in nature may be similar to other standard land uses in the City and model, making them easier to quantify using the WRCOG VMT Calculator. The calculator can estimate the project VMT based on the project type, size, location, and average travel distance to the project site. The results can be used to compare the project's VMT to the adopted threshold to assess potential significant impacts without the need to run RIVCOM. The VMT Calculator does not replace a full VMT assessment utilizing RIVCOM but may be sufficient to estimate the VMT impact for routine projects with similar land use types in the project TAZ. TAZs are geographic polygons used to represent areas of homogenous travel behavior.[7] The VMT Calculator can be used to determine if a proposed project is similar in nature to the uses within the project TAZ. If a proposed project's land use differs from the assumed land use in a project TAZ, it is not appropriate to assume that a project will result in similar VMT or trip length characteristics, and a full model run utilizing RIVCOM would be recommended.

3.17.3 Existing Environmental Setting

The Project site is located in the city of Lake Elsinore, Riverside County, California. This section describes the existing transportation conditions, including the roadway network, bicycle facilities, pedestrian facilities, and transit service, within Riverside County, Lake Elsinore, and the Project site.

The Project site is irregular in shape and bounded by primarily undeveloped land in all directions. The Project site includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations

[7] City of Lake Elsinore. 2020. *Traffic Impact Analysis Preparation Guide.* June 23. Revised November 14, 2022. Website: https://www.lake-elsinore.org/DocumentCenter/View/2373/Traffic-Impact-Analysis-Preparation-Guide-PDF?bidId= (accessed August 21, 2025).

from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an aboveground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses are outside the Project site limits. The Project site is vacant and does not currently generate any vehicle trips or VMT.

3.17.3.1 Existing Roadway Network

Regional access to the city is provided by Interstate (I-)15, which is a north-south transportation facility, and State Route (SR-) 74, which is a southwest-northeast transportation facility. Both of these transportation facilities are regionally important and connect Lake Elsinore to the greater Riverside area. The city's roadway network forms the core of its circulation infrastructure and includes a hierarchy consisting of seven classifications: augmented urban arterial, urban arterial, major, secondary, collector highway, divided collector, and special new roadway. Descriptions of roadways in the vicinity of the Project site are provided below using the roadway classifications defined in Chapter 2.0, Community Form, of the City's General Plan.[8]

- **Baker Street** is an unpaved, two-lane, northwest-southeast street, a segment of which is located within the Project site. No sidewalks are provided along either side of Baker Street in the vicinity of the Project site. Baker Street is designated as a collector highway in the City's General Plan. A collector highway consists of two lanes and has a 68-foot right-of-way (ROW), providing two opposing 12-foot lanes of traffic and a 12-foot center median.[9]

- **Nichols Road** is a paved, undivided, two-lane, east-west street located northwest of the Project site. A segment of Nichols Road is also within the Project site. No sidewalks are provided along either side of Nichols Road in the vicinity of the Project site. The portion of Nichols Road between Baker Street and El Toro Road is designated as an urban arterial highway in the City's General Plan. An urban arterial highway has a ROW of 120 feet. An urban arterial highway includes three lanes of traffic in each direction, with the first and third lanes measuring 12 feet wide and the middle lane measuring 11 feet wide, along with a 14-foot raised median.[10]

- **Pierce Street** is an unpaved east-west street located northwest of the Project site. A segment of Pierce Street is also located within the Project site. No sidewalks are provided along either side of Pierce Street in the vicinity of the Project site. Pierce Street does not have a designation in the City's General Plan.

[8] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, Figure 2.3, Roadway Classifications. December 13.

[9] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, Figure 2.2 Roadway Cross Sections. December 13.

[10] Ibid.

- **Coal Avenue** is an unpaved east-west street located northwest of the Project site. No sidewalks are provided along either side of Coal Avenue in the vicinity of the Project site and it does not have a designation in the City's General Plan.

- **Collier Avenue** is a paved, undivided, four-lane, northwest-southeast street located northeast of the Project site. Sidewalks are provided along both sides of Collier Avenue in the vicinity of the Project site. Collier Avenue is designed as a major highway in the City's General Plan. A major highway typically features a 100-foot ROW and includes two travel lanes in each direction, separated by a 14-foot median. The outer lanes are 15 feet wide, while the inner lanes are 12 feet wide, with additional space allocated for bike lanes and sidewalks.[11]

- **I-15** is a divided, six-lane, north-south transportation facility located northeast of the Project site that provides connections to San Bernardino, Riverside, and San Diego counties. To the north, I-15 connects with the Riverside Freeway (SR-91), the Pomona Freeway (SR-60), and the San Bernardino Freeway (I-10). To the south, I-15 connects with the Escondido Freeway (I-215). Access between I-15 and the Project site is provided via the interchange at Nichols Road. I-15 is designated as I-15 in the City's General Plan.

- **SR 74** is a southwest-northeast transportation facility located south of the Project site that extends from I-5 in Orange County to the city limits of Palm Desert in Riverside County. In the vicinity of the Project site, between Collier Avenue and Lakeshore Drive, SR-74 consists of two undivided lanes and is designated as an urban arterial in the City's General Plan. Northeast of Collier Avenue, SR-74 is a divided, four-lane road and is designated as an augmented urban arterial highway in the City's General Plan. An augmented arterial highway provides four travel lanes in each direction—an outer lane at 14 feet, two inner lanes at 11 feet, and an innermost lane at 12 feet—along with sidewalks and a collective 14-foot-wide median, all within a 134-foot ROW.[12]

3.17.3.2 Truck Network

SR-74 and I-15 are designated as truck routes in the vicinity of the Project site.[13]

3.17.3.3 Pedestrian Facilities

There are currently no sidewalks in the vicinity of the Project site; however, sidewalks are provided along both sides of Collier Avenue.

3.17.3.4 Bicycle Facilities

Bikeway planning and design in California typically relies on guidelines and design standards established by the California Department of Transportation (Caltrans) in the *Highway Design Manual*

11 City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, Figure 2.2 Roadway Cross Sections. December 13.

12 Ibid.

13 City of Lake Elsinore. Traffic Engineering, Truck Routes. Website: https://www.lake-elsinore.org/Quick Links.aspx?CID=51 (accessed January 2025).

(Chapter 1000: Bicycle Transportation Design). The Caltrans guidelines cover four primary types of bikeway facilities: Class I, Class II, Class III, and Class IV. These facility types are discussed below:

- **Class I Bikeways** (Bike Paths) provide a separate ROW, are designated for the exclusive use of bicycles and pedestrians, and minimize vehicle and pedestrian crossflow. In general, bike paths serve corridors that are not served by existing streets and highways, or where sufficient ROW exists for such facilities to be constructed.

- **Class II Bikeways** (Bike Lanes) are lanes for bicyclists generally adjacent to the outer vehicle travel lanes. These lanes have special lane markings, pavement legends, and signage. Bicycle lanes are generally 5 feet wide. Adjacent vehicle parking and vehicle/pedestrian crossflow are permitted. Note that when grade separation or buffers are constructed between the bicycle and vehicle lanes, these facilities are classified as Class IV Separate Bikeways.

- **Class III Bikeways** (Bicycle Routes/Bicycle Boulevards) are designated by signs or pavement markings for shared use with pedestrians or motor vehicles but have no separated bicycle ROW or lane striping. Bicycle routes serve either to (1) provide continuity to other bicycle facilities or (2) designate preferred routes through high-demand corridors. Bicycle routes are implemented on low-speed (less than 25 miles per hour) and low-volume (fewer than 3,000 vehicles/day) streets.[14]

- **Class IV Bikeways** (Separated Bikeway), also known as “cycle tracks” or “protected bike lanes,” provide a ROW designated exclusively for bicycle travel within a roadway and are protected from other vehicle traffic with devices including, but not limited to, grade separation, flexible posts, inflexible physical barriers, or parked cars.

In addition, the City’s General Plan identifies an additional classification of bikeway facility—Multi-Purpose lanes—as described below:

- **Multi-Purpose** lanes are paths or trails available for joint bicycle, pedestrian, and equestrian uses that may or may not be separated or paved.[15]

In the Project vicinity, the City’s General Plan identifies planned Class II bike lanes on Nichols Road, Collier Avenue, and SR 74; however, none of these bike lanes have been constructed.[16]

3.17.3.5 Transit

Transit service in Lake Elsinore is provided by the Riverside Transit Agency (RTA), which provides fixed-route and Dial-a-Ride bus service within the city and neighboring jurisdictions. The RTA operates three routes within the city. RTA Route 8 provides service in Lake Elsinore, with the nearest bus stops serving the Project site located at the Outlets at Lake Elsinore off of Collier Avenue, approximately 800 feet

[14] City of Lake Elsinore. 2019. Active LE. October.
[15] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, Bikeways, 2-31. December 13.
[16] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form, Figure 2.5 Bikeway Plan. December 13.

and 3,000 feet east of the Project site.[17] Transit service is reviewed and updated by the RTA periodically to address ridership, budget, and community demand needs/changes. Changes in land use can affect these periodic adjustments, which may lead to either enhanced or reduced service where appropriate.

3.17.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.17.4.1 Federal Regulations

No federal regulations are applicable to the proposed Project.

3.17.4.2 State Regulations

California Department of Transportation. Caltrans is the State agency responsible for the maintenance and operation of State routes and highways. In Lake Elsinore, Caltrans facilities include I-15 and SR 74. Caltrans maintains a volume monitoring program and reviews local agencies' planning documents (such as this EIR) to assist in its forecasting of future volumes and congestion points. The *Guide for the Preparation of Traffic Impacts Studies* published by Caltrans is intended to provide a consistent basis for evaluating traffic impacts to State facilities. The City recognizes that "Caltrans endeavors to maintain a target level of service at the transition between LOS C and LOS D on State highway facilities"[18]; however, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. Caltrans states that, for existing State highway facilities operating at less than the target LOS, the existing LOS should be maintained. Caltrans released a *VMT-Focused Transportation Impact Study Guide* (May 20, 2020) that recommends use of the LCI recommendations for land use projects and plans.

Senate Bill 375. As a means to achieve the statewide emission reduction goals set by Assembly (AB) Bill 32 ("The California Global Warming Solutions Act of 2006"), SB 375 ("The Sustainable Communities and Climate Protection Act of 2008") directs the California Air Resources Board (CARB) to set regional targets for reducing GHG emissions from cars and light trucks. Using the template provided by the State's Regional Blueprint Planning Program to accomplish this goal, SB 375 seeks to align transportation and land use planning to reduce VMT through modified land use patterns. There are five basic directives of the bill: (1) creation of regional targets for GHG emissions reduction tied to land use, (2) a requirement that regional planning agencies create a sustainable communities strategy (SCS) to meet those targets (or an Alternative Planning Strategy if the strategies in the SCS would not reach the target set by CARB), (3) a requirement that regional transportation funding decisions be consistent with the SCS, (4) a requirement that the Regional Housing Needs Allocation numbers for municipal general plan housing element updates must conform to the SCS, and (5) CEQA exemptions and streamlining for projects that conform to the SCS.

[17] Riverside Transit Agency. 2025. Route 8, Lake Elsinore – Wildomar Loop. January 12.

[18] California Department of Transportation. 2002. *Guide for the Preparation of Traffic Impact Studies*. December.

Senate Bill 743. SB 743 was signed into law in 2013 and fundamentally changed the way transportation impacts under CEQA are analyzed. It required LCI to "prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the [CEQA] guidelines …establishing criteria for determining the significance of transportation impacts of projects within transit priority areas" to "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."

Public Resources Code Section 15064.3. On December 28, 2018, the Natural Resources Agency adopted *State CEQA Guidelines* Section 15064.3, which establishes specific criteria for evaluating a project's transportation impacts and states that "vehicle miles traveled is the most appropriate measure of transportation impacts." It gives agencies the "discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure" provided that "[a]ny assumptions used to estimate vehicle miles traveled… should be documented and explained in the environmental document prepared for the project." Section 15064.3 further states that except for certain transportation projects, "a project's effect on automobile delay shall not constitute a significant environmental impact." See *Citizens for Positive Growth & Preservation v. City of Sacramento* (2019) 43 Cal. App. 5th 609, 626, holding that a general plan's impact on LOS, which effectively measures automobile travel delay, can no longer constitute a significant environmental impact.

Technical Advisory on Evaluating Transportation Impacts in CEQA. Additionally, LCI issued its Technical Advisory on Evaluating Transportation Impacts in CEQA[19] in December 2018, which includes general guidance and information for lead agencies to use in implementing SB 743, including choosing VMT methodology and establishing VMT thresholds. The City has adopted guidelines for VMT analysis to comply with CEQA-required assessments of transportation impacts. The City's *Traffic Impact Analysis Preparation Guide*[20] outlines screening criteria and requirements for VMT assessment of land use projects based on the WRCOG *Implementation Pathway Study*,[21] which provides options for both methodologies and VMT screening. Projects not screened through the steps above should complete VMT analysis and forecasting through the latest version of the RIVCOM to determine if they have a significant VMT impact.

3.17.4.3 Regional Regulations

Southern California Association of Governments. Regional planning in Orange, Los Angeles, Ventura, Riverside, San Bernardino, and Imperial counties is conducted by the Southern California Association of Governments (SCAG). SCAG is also the federally designated Metropolitan Planning Organization (MPO) for these six counties. As the designated MPO, SCAG is mandated by the federal government to research and prepare plans for transportation, a growth forecast, hazardous waste, and air quality. The growth forecast serves as the foundation of these plans. Of the various plans adopted by SCAG,

[19] California Governor's Office of Land Use and Climate Innovation. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA.* April.

[20] City of Lake Elsinore. 2020. *Traffic Impact Analysis Preparation Guide.* June 23. Revised November 14, 2022.

[21] Western Riverside Council of Governments (WRCOG). 2019. WRCOG SB 743 Implementation Pathway Document Package. March.

the Regional Comprehensive Plan (RCP)[22] and the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)[23] are relevant to the proposed Project.

- **Regional Comprehensive Plan.** In 2008, SCAG adopted the RCP for the purpose of providing a comprehensive strategic plan for defining and solving housing, traffic, water, air quality, and other regional challenges. The 2008 RCP has two primary objectives in implementing this strategic plan: (1) integrating transportation, land use, and air quality planning approaches, and (2) outlining key roles for public- and private-sector stakeholders to implement reasonable policies regarding transportation, land use, and air quality approaches. While the 2008 RCP outlines several policies to inform local decision makers within the SCAG region with respect to policy and planning decisions, these policies are considered recommendations and are not mandated by law. With respect to land use policy, the 2008 RCP includes a Land Use and Housing chapter that aims to link land use and transportation planning decisions to the projected population and economic growth in the SCAG region. Specifically, the Land Use and Housing chapter of the 2008 RCP promotes sustainable planning for land use and housing in the SCAG region by maximizing the efficiency of the existing circulation network, providing a greater variety in housing types, promoting a diverse and growing economy, and protecting the existing natural environment. The 2008 RCP identifies voluntary implementation efforts by all levels of government and stakeholders to limit significant land use changes to only 2 percent of the total land area in the region, known as the "2% Strategy." However, these areas have since been updated and replaced by the High-Quality Transit Areas (HQTAs) identified in the 2016–2040 RTP/SCS.

- **Regional Transportation Plan/Sustainable Communities Strategy.** On April 4, 2024, SCAG adopted the 2024 RTP/SCS (Connect SoCal 2024). Connect SoCal 2024 is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies, and between the people whose collaboration can improve the quality of life for Southern Californians, including consideration of housing/jobs balance within the region. Similar to the 2020–2045 RTC/SCS, the core vision for Connect SoCal 2024 is to increase mobility options and achieve a more sustainable growth pattern. The goals of Connect SoCal 2024 are designed to achieve this vision and fall into four core categories, including mobility, communities, environment, and economy, as described below:

    - **Mobility:** Build and maintain an integrated multimodal transportation network.
    - **Communities:** Develop, connect, and sustain communities that are livable and thriving.
    - **Environment:** Create a healthy region for the people of today and tomorrow.
    - **Economy:** Support a sustainable, efficient, and productive regional economic environment that provides opportunities for all residents.

[22] Southern California Association of Governments (SCAG). 2008. *Final 2008 Regional Comprehensive Plan.*

[23] Southern California Association of Governments (SCAG). 2024. *Connect SoCal, A Plan for Navigating to a Brighter Future.* April 4.

Connect SoCal 2024 outlines the challenges facing the region, shared goals and policies, as well as the transportation investments and land use strategies and policies to meet GHG reduction targets and deliver significant benefits to the region with respect to mobility, safety, health outcomes, travel time reliability, air quality, economic productivity, environmental justice, and transportation.

3.17.4.4 Local Regulations

Riverside County Transportation Uniform Mitigation Fee. The Riverside County Transportation Uniform Mitigation Fee (TUMF) program is administered by the WRCOG based on a regional Nexus Study that was most recently updated in 2024 to address major changes in ROW acquisition and improvement cost factors (*Transportation Uniform Mitigation Fee Nexus Study 2024 Update*). The regional TUMF program was put into place to ensure that development pays its fair share of transportation costs and improvements, and that funding is in place for the construction of Riverside County transportation facilities needed to maintain the requisite LOS and critical to mobility in the region. TUMF, as it is a regional mitigation fee program, is imposed and implemented in every jurisdiction (e.g., the City of Lake Elsinore) in western Riverside County. Implementation of the TUMF program is accomplished through Chapter 16.83 (Western Riverside County Transportation Uniform Mitigation Fee [TUMF] Program) of the City's Municipal Code.

City of Lake Elsinore Municipal Code

- **Chapter 16.83 (Western Riverside County Transportation Uniform Mitigation Fee [TUMF] Program):** Chapter 16.83 of the City of Lake Elsinore Municipal Code implements the TUMF program, as discussed above.

- **Chapter 10.68 (Transportation Demand Management):** Chapter 10.68 of the City's Municipal Code requires applicable developments to incorporate facilities and/or programs sufficient to attain a 12 percent work-related trip reduction from the expected number of trips related to the project, as indicated in the Trip Generation Handbook published by the ITE.

    - **Section 10.68.020:** Details the applicability, standards, and facilities for new employment-generating developments that could employ 100 or more persons. For industrial/manufacturing land uses, new employment-generating developments that could employ 100 or more persons is based on a methodology of 500 square feet per employee.

- **Chapter 16.74 (City of Lake Elsinore Development Impact Fee Program):** Chapter 16.74 of the City of Lake Elsinore Municipal Code provides for the payment of development impact fees for traffic infrastructure, City Hall and public works facilities, community center facilities, lakeside facilities, animal shelter facilities, fire facilities, library facilities, and drainage facilities.

- **Chapter 16.78 (Major Thoroughfare and Bridge Fee Program):** Chapter 16.78 of the City's Municipal Code provides for the payment of fees to defray the actual or estimated costs for the construction of bridges and major thoroughfares as a condition of approval of a final map or as a condition of issuing a building permit.

City of Lake Elsinore General Plan, Chapter 2.0, Community Form. Chapter 2.0 of the City of Lake Elsinore General Plan outlines where and how the City of Lake Elsinore would develop and provides the following goals and policies pertaining to transportation that would be applicable to the proposed Project:

- **Goal 6:** Optimize the efficiency and safety of the transportation system within the City of Lake Elsinore.
    - **Policy 6.1:** The interconnection and coordination of traffic signals shall be achieved through two processes, namely the requirements in the conditions of approval on development projects and/or through the implementation of Capital Improvement Program projects.
    - **Policy 6.2:** Enforce and comply with proper intersection "sight distance" requirements as described by the Engineering Division.
    - **Policy 6.3:** Maximize the use of shared driveways and on-site circulation to minimize conflicts at access points to the roadway network.

3.17.5 Thresholds of Significance

The following thresholds of significance are based on Appendix G of the *State CEQA Guidelines.* Based on these thresholds, implementation of a project would have a significant adverse impact with respect to transportation if it would:

Threshold 3.17.1: Conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities,

Threshold 3.17.2: Conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b),

Threshold 3.17.3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment), or

Threshold 3.17.4: Result in inadequate emergency access.

3.17.6 Project Impacts

Threshold 3.17.1: Would the project conflict with program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant. The proposed Project would develop the 65.81-acre Onsite Development Area portion of the Project site with a 212,028-square-foot warehouse (Building 1) with a 5,000 square-foot ground-level office space and a 5,000 square-foot office mezzanine, and a 788,423-square-foot warehouse (Building 2) with a 10,000 square-foot ground-level office space and a 10,000 square-foot office mezzanine. The proposed Project also includes 37.86 acres of Offsite Improvement Area, a

33.65-acre Restoration Area, and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area.

Building 1 would be located at the northwestern end of the Onsite Development Area and includes 23 dock doors along the southwest side of the building. Building 2 would be located at the southeastern end of the Onsite Development Area and includes 110 dock doors along the northeast side of the building. The proposed warehouses would be set back from the public ROW in the north and east (e.g., 94 feet from Pierce Street and at least 64 feet from Baker Street), and would include vehicle and truck parking as well as bike racks for bicycle parking.

Regional access to the Project site is provided from I-15 via Nichols Road. The proposed development area would have primary access off Pierce Street and Baker Street via Nichols Road. As depicted on Figure 2-4, the Onsite Development Area would be accessible via four new driveways. Three driveways would be constructed along Baker Street, and one driveway would be along Pierce Street. Building 1 would be accessible via one passenger vehicle driveway along Pierce Street and one 53-foot truck access driveway along Baker Street. Building 2 would be accessible via two 50-foot driveways along Baker Street that would be used by passenger vehicles and trucks. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed behind the rear of Building 2 that would extend to Building 1 for access to Pierce Street. The reciprocal access agreement would largely be intended to provide a secondary point of emergency access for Building 2.

The proposed Project would provide 466 vehicle parking stalls located along the north, east, and west sides of Building 1 and at the southern end of Building 2, and approximately 389 trailer parking stalls. 29 trailer parking stalls would be located on the south side of Building 1, 78 trailer parking stalls would be located on the north side of Building 2, 146 trailer parking stalls would be located on the east side of Building 2, and 136 trailer parking stalls would be located on the south side of Building 2.

The proposed Project also includes 37.86 acres of Offsite Improvements on Baker Street and Pierce Street and includes the realignment of Baker Street to Nichols Road. The proposed Project would dedicate 4 feet of ROW on each side of Baker Street to meet the ultimate 68-foot ROW required by the City's collector highway designation in the General Plan Circulation Element. Baker Street would be extended to terminate at Nichols Road for a direct connection and new intersection with Nichols Road and would be improved with a 6-foot-wide sidewalk within a 10-foot parkway on the southwest side of the street, and a 6-inch curb and gutter and 24 feet of pavement from the centerline to the lip of the gutter on each side of the street for approximately 0.8 mile from Nichols Road toward the southeast through the Offsite Improvement Area portion of the Project site. Baker Street would be elevated an average of 5 feet above its existing elevations along the proposed segment to be improved to support drainage conveyance and flood protection of the public ROW, and the northeast parkway of Baker Street would slope down to discharge to the northerly properties.

Pierce Street would be improved to its ultimate 60-foot full-width ROW per the City's General Plan Circulation Element standard for a Local Street with a 6-inch curb, standard gutter, 6-foot-wide sidewalk within an overall 10-foot parkway, and 20 feet of pavement from centerline to lip-of-gutter on each side of the street from Nichols Road southwest past the Project frontage to connect to Hoff Avenue, creating a second means of emergency access. The section of Pierce Street from the Project

frontage to Hoff Avenue would be paved within the existing ROW, creating a 24-foot-wide roadway along this segment. All street improvements would be constructed consistent with City standards and regulations.

Trip generation rates were determined using the ITE *Trip Generation Manual,* 11th Edition. The proposed Project is estimated to generate approximately 2,384 daily trips, 167 a.m. (128 inbound and 39 outbound) peak-hour trips, and 183 p.m. (53 inbound and 130 outbound) peak-hour trips. The Project trip generation was adjusted using passenger car equivalent (PCE) factors from the *Riverside County Transportation Analysis Guidelines.*[24] PCE factors provide an adjustment for the increased roadway capacity utilized by truck trips due to their heavier weight, larger size, and reduced maneuverability. In terms of PCEs, the proposed Project is estimated to generate approximately 3,757 daily PCE trips, 258 a.m. (197 inbound and 61 outbound) peak-hour PCE trips, and 281 p.m. (81 inbound and 200 outbound) peak-hour PCE trips. Table 3.17.A: Project Trip Generation presents the trip generation estimate for the proposed Project.

Project trip generation serves as a baseline to determine how the proposed project could affect roadway facilities expected to be utilized during project operation. Project trip generation is applied to project trip distribution, taking into account the roadway network and the location of other land uses in proximity to the project site, in order to develop a project trip assignment to evaluate how the proposed project could affect the LOS of roadway facilities expected to be utilized during project operation. The City has adopted LOS policies in its General Plan. The recommended improvements identified through the City's Industrial Design Review process and conditions established in the project-specific Development Agreement would be required to offset the Project's effects on LOS and congestion. The Project's adherence to these conditions of approval would ensure that General Plan standards related to congestion on the City's circulation system are appropriately addressed.

For CEQA purposes, the proposed Project would be consistent with applicable plans, ordinances, and policies that address the City's circulation system. In addition, as discussed in more detail in Section 3.11, Land Use and Planning, the proposed Project does not conflict with the intent of the City's General Plan Land Use or Zoning Regulations. As described in Table 3.11.C, General Plan Consistency Analysis, in Section 3.11, the proposed Project would be consistent with applicable land use goals and policies related to transportation and circulation contained in the City's General Plan Circulation Element. In addition, because the growth projections contained in Connect SoCal 2024, including the growth forecast at the TAZ level, are based on build out of the adopted general plans of member agencies, including the City's General Plan, the proposed Project would also be consistent with Connect SoCal 2024.

[24] County of Riverside. 2020. *Riverside County Transportation Analysis Guidelines.* December.

Table 3.17.A: Project Trip Generation

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Trip Rates							
High-Cube Cold Storage Warehouse[1] (TSF)	2.12	0.08	0.03	0.11	0.03	0.09	0.12
Manufacturing[2]	4.75	0.52	0.16	0.68	0.23	0.51	0.74
Proposed Project Trip Generation							
High-Cube Cold Storage Warehouse							
High-Cube Cold Storage Warehouse (900.4059 TSF)	1,909	76	23	99	30	78	108
Vehicle Mix[3]							
Passenger Vehicles (55 percent)	1,056	42	13	55	17	43	60
2-Axle Trucks (15.5 percent)	296	12	3	15	5	12	17
3-Axle Trucks (4.9 percent)	94	3	2	5	1	4	5
4+-Axle Trucks (24.3 percent)	464	19	5	24	7	19	26
Total	1,909	76	23	99	30	78	108
PCE Trip Generation[4]							
Passenger Vehicles (PCE Factor 1.0)	1,056	42	13	55	17	43	60
2-Axle Trucks (PCE Factor 1.5)	444	18	5	23	8	18	26
3-Axle Trucks (PCE Factor 2.0)	188	6	4	10	2	8	10
4+-Axle Trucks (PCE Factor 3.0)	1,392	57	15	72	21	57	78
Total	3,080	123	37	160	48	126	174
Manufacturing							
Manufacturing (100.045 TSF)	475	52	16	68	23	52	75
Vehicle Mix[5]							
Passenger Vehicles (72.5 percent)	344	38	11	49	17	38	55
2-Axle Trucks (4.6 percent)	22	2	1	3	1	2	3
3-Axle Trucks (5.7 percent)	27	3	1	4	1	3	4
4+-Axle Trucks (17.2 percent)	82	9	3	12	4	9	13
Total	475	52	16	68	23	52	75
PCE Trip Generation[4]							
Passenger Vehicles (PCE Factor 1.0)	344	38	11	49	17	38	55
2-Axle Trucks (PCE Factor 1.5)	33	3	2	5	2	3	5
3-Axle Trucks (PCE Factor 2.0)	54	6	2	8	2	6	8
4+-Axle Trucks (PCE Factor 3.0)	246	27	9	36	12	27	39
Total	677	74	24	98	33	74	107
Total Passenger Trip Generation	1,400	80	24	104	34	81	115
Total Project Trip Generation	2,384	128	39	167	53	130	183
Total PCE Trip Generation	3,757	197	61	258	81	200	281

Source: EPD Solutions, Inc. (December 22, 2023; revised March 22, 2024).

[1] Trip rates from the ITE, *Trip Generation,* 11th Edition (2021). Land Use Code 157 – High-Cube Cold Storage Warehouse.

[2] Trip rates from the ITE, *Trip Generation,* 11th Edition (2021). Land Use Code 140 – Manufacturing.

[3] Vehicle mix from the SCAQMD Warehouse Truck Trip Study Data Results and Usage, July 2014. Classification: With Cold Storage.

[4] PCE factors from the *Riverside County Transportation Analysis Guidelines* (December 2020).

[5] Vehicle mix from the SCAQMD *Warehouse Truck Trip Study Data Results and Usage* (July 2014). Classification: Without Cold Storage.

ITE = Institute of Transportation Engineers
PCE = passenger car equivalent
SCAQMD = South Coast Air Quality Management District
TSF = thousand square feet

Transit Facilities. The closest existing bus stops serving the Project site are located at the Outlets at Lake Elsinore off Collier Avenue, which is approximately 0.44 mile from the Onsite Development Area; therefore, these bus stops would provide service for Project employees. However, most people are expected to arrive by automobile to the Project site. Therefore, the proposed Project is not expected to generate a substantial number of new transit trips that would cause any transit route to require additional capacity. In addition, implementation of the proposed Project would not preclude build out of the City's or RTA's planned transit network as detailed in the City's General Plan. No inconsistencies with any adopted transit system plans, guidelines, policies, or standards would occur, and potential impacts to transit facilities would be **less than significant**. No mitigation is required.

Roadway Facilities. Per SB 743, transportation impacts related to vehicle delay or LOS are no longer considered significant environmental impacts. As discussed above, the proposed Project would include off-site improvements on Baker Street and Pierce Street and the realignment of Baker Street to Nichols Road. Proposed off-site improvements would include full build out of Baker Street and Pierce Street consistent with the City's General Plan, as well as new pavement and new parkways. As proposed improvements to the adjacent roadways would be consistent with the City's General Plan and implementation of the proposed Project would not preclude build out of the City's planned roadway network as detailed in the City's General Plan, no inconsistencies with applicable roadway system plans, guidelines, or policy standards would occur. As such, potential impacts related to roadway facilities would be **less than significant**. No mitigation is required.

Bicycle and Pedestrian Facilities. Under existing conditions, no sidewalks are located in the immediate vicinity of the Project site; however, sidewalks are provided along both sides of Collier Avenue, which is approximately 0.33 mile from the Onsite Development Area. In the Project vicinity, the City's General Plan includes planned Class II bike lanes on Nichols Road, Collier Avenue, and SR 74; however, none of these bike lanes have been constructed. As discussed above, the proposed Project would include off-site improvements on Baker Street and Pierce Street, including the construction of new sidewalks where none currently exist. No other pedestrian or bicycle facilities are proposed as part of the proposed Project. In addition, implementation of the proposed Project would not preclude build out of the City's planned pedestrian or bicycle transportation network as detailed in the City's General Plan. No inconsistencies with adopted bicycle or pedestrian system plans, guidelines, or policy standards would occur, and potential impacts related to bicycle and pedestrian facilities would be **less than significant**. No mitigation is required.

Threshold 3.17.2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?

Less Than Significant. Senate Bill 743 and the resulting *State CEQA Guidelines* update effectively replace the use of LOS for determining transportation impacts with an evaluation of daily VMT. CEQA Guidelines Section 15064.3, subdivision (b), provides criteria for analyzing transportation impacts based on VMT and authorizes a lead agency to choose the most appropriate methodology to evaluate a project's VMT. The proposed Project was assessed utilizing the guidelines outlined in the City of Lake Elsinore Transportation Study Guidelines, consistent with CEQA Guidelines Section 15064.3. The City's

guidelines include screening thresholds to identify if a project would be considered to have a less than significant impact on VMT and therefore could be screened out from further VMT analysis. If a project meets one of the following criteria, then the VMT impact of the project would be considered less than significant and no further analysis of VMT would be required:

1. TPA Screening
2. Low-VMT Area Screening
3. Project Type Screening

The City's guidelines employ the WRCOG travel forecasting model to measure VMT performance for individual TAZs. If the proposed Project is located in a low-VMT-generating area, the proposed Project would be presumed to have a less than significant VMT impact. Based on the WRCOG VMT tool, the Project site is located in a low-VMT-generating area as the TAZ that contains the Project site has an average VMT per capita of 31.3, which is less than the City's threshold of 35.5. In addition, the proposed Project is consistent with the existing land use within the TAZ for the Project site. Therefore, the proposed Project is located in a low-VMT area and is presumed to have a **less than significant** VMT impact. No mitigation is required.

Threshold 3.17.3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant. For purposes of CEQA, transportation-related hazards generally refer to the roadway engineering aspects of a project (e.g., speed, turning movements, complex designs, substantial distance between street crossings, sight lines) that may cause a risk of collisions that result in serious or fatal physical injury. This analysis focuses on hazards that could reasonably stem from the Project, beyond collisions that may result due to unsafe drivers or collisions that could not be prevented by design of the circulation system.

As discussed above, the Onsite Development Area would have primary access off Pierce Street and Baker Street via Nichols Road. As depicted on Figure 2-4, the Onsite Development Area would be accessible via four new driveways. Three driveways would be constructed along Baker Street, and one driveway would be along Pierce Street. Building 1 would be accessible via one passenger vehicle driveway along Pierce Street and one 53-foot truck access driveway along Baker Street. Building 2 would be accessible via two 50-foot driveways along Baker Street that would be used by passenger vehicles and trucks. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed behind the rear of Building 2 that would extend to Building 1 for access to Pierce Street. The reciprocal access agreement would largely be intended to provide a secondary point of emergency access for Building 2.

Off-site improvements to the existing roadway network (e.g., widening, parkways, sidewalk, curb and gutter) would be constructed to meet City standards and would be implemented to the satisfaction of the City Engineer. The proposed driveways and intersections would also be designed so as to not introduce hazards due to geometric design features (e.g., sharp curves or dangerous intersections).

In addition, the proposed Project does not include incompatible uses (i.e., farm equipment) to the surrounding area and no new land use would occur on the public ROWs. Further, the proposed Project's land uses would be separated from adjacent land uses by existing roadways and undeveloped land, providing a distance buffer for surrounding development. Therefore, the proposed Project would not introduce safety hazards due to geometric design features or incompatible uses. Impacts would be **less than significant**. No mitigation is required.

Threshold 3.17.4: Would the project result in inadequate emergency access?

Less Than Significant. Construction activities associated with the proposed Project may affect emergency access and response times due to temporary detour routes and temporary road/pedestrian/bicycle facility closures in the vicinity of the Project site. However, internal access roads would be constructed throughout the Project site during construction activities to provide emergency response vehicles with access to the warehouse development. Further, in order to maintain traffic flows to the greatest extent practicable during construction, the construction contractor would be required to prepare and implement a Transportation Management Plan (TMP) (RCM TRA-1), to be reviewed and approved by City staff. The TMP would be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook*[25] and would include provisions to maintain traffic flow along Pierce Street, Baker Street, and Nichols Road; safe access into and out of the Project site; and emergency access to the Project site and adjacent areas during construction. With implementation of RCM TRA-1, construction of the proposed Project, including temporary lane closures along Pierce Street, Baker Street, and Nichols Road would not result in inadequate emergency access to the Project site.

During Project operations, unimpeded access throughout the Onsite Development Area would be maintained by ensuring that vehicles would not be parked or placed in a manner that would impede access for emergency response vehicles. Additionally, perimeter and internal roadways would be maintained in such condition to allow for the safe and unobstructed passage of emergency response vehicles. As previously discussed, the proposed Project would include improvements to the existing roadway network and development of an internal roadway network consistent with City design standards. Overall, the proposed Project would provide adequate access and signage for patrons, workers, and emergency access personnel.

In addition, the proposed internal circulation system is designed to a width sufficient to accommodate emergency vehicles pursuant to the requirements of the California Fire Code, the City, and the Riverside County Fire Department. In addition, prior to Project approval, the Riverside County Fire Department would review the Final Site Plan to ensure that adequate emergency access to the development area is provided. If additional features are required, the proposed Project would need to incorporate these as conditions of approval.

[25] California Inter-Utility Coordinating Committee. 2018. *California Temporary Traffic Control Handbook, 7th Edition.* May.

Compliance with the California Fire Code and review and approval by the Riverside County Fire Department would ensure the proposed Project would provide adequate emergency access. Impacts would be **less than significant**. No mitigation is required.

3.17.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts related to transportation.

3.17.8 Compliance Measures and Mitigation Measures

The following regulatory compliance measure (RCM) is applicable to the proposed Project.

RCM TRA-1 **Transportation Management Plan.** The construction contractor is required to prepare and implement a Transportation Management Plan (TMP) during construction of the proposed Project. The Draft TMP shall be reviewed and approved by the Director of the City of Lake Elsinore Engineering Department, or designee, prior to the initiation of construction. The TMP shall be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook* and shall include provisions to maintain traffic flow along Pierce Street, Baker Street, and Nichols Road; safe access into and out of the Project site; and emergency access to the Project site and adjacent areas during construction.

The proposed project would not result in any significant adverse impacts related to transportation, and no mitigation would be required.

3.17.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed Project related to transportation.

3.17.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and probable future projects within the cumulative impact area for transportation, as listed in Table 3.A, Cumulative Project List, in Section 3.0 of this Draft EIR. The cumulative impact area for transportation is the city and the portion of Riverside County in the vicinity of the Project site containing transportation facilities that may experience Project-related vehicle trips. As summarized in this section, the proposed Project, in combination with cumulative projects, would have less than significant cumulative impacts with respect to conflicts with applicable plans, VMT, hazards, and emergency access.

Consistent with the LCI *Technical Advisory on Evaluating Transportation Impacts in CEQA,* a project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual 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." A project that falls below an efficiency-based threshold that aligns with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. As discussed above, the proposed Project

would have a less than significant VMT impact. Other projects in the city would be required to analyze project-specific VMT impacts and implement measures to reduce VMT below adopted thresholds, as necessary. For these reasons, the proposed Project, in combination with cumulative projects, would have a less than significant cumulative impact with respect to VMT.

Future development would be required to comply with existing regulations, including General Plan policies that have been prepared to minimize impacts related to transportation and circulation. The City would implement the General Plan programs that require the City to annually update the Capital Improvement Program to reflect City and community priorities for physical projects related to transportation for all travel modes. Further, the proposed Project would not create any conflicts with existing regulations and would not create any conditions that would compromise the ability of future development to comply with existing regulations. Therefore, the proposed Project, in combination with cumulative projects, would have a less than significant cumulative impact with respect to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities.

Overall, cumulative land use development and transportation projects would promote accessibility for people walking to and through the site by conforming to General Plan policies and zoning regulations, and by adhering to planning principles that emphasize providing convenient connections and safe routes for people walking, bicycling, driving, and taking transit. As with current practice, projects would be designed and reviewed in accordance with the City's Public Works Department requirements, which would provide oversight engineering review to ensure that the projects are constructed according to City specifications. As a result, the cumulative projects would not generate activities that would increase hazards due to a design feature or incompatible use, or result in inadequate emergency access. Further, the Project would not introduce any hazardous design features or incompatible land uses with the potential to affect roadways potentially serving these cumulative projects. As such, the proposed Project, in combination with cumulative projects, would have a less than significant cumulative impact with respect to design features, incompatible uses, and emergency access.

Based on the information in this transportation section and for the reasons summarized above, the cumulative transportation impacts of the proposed Project and related projects would be **less than cumulatively considerable**. Mitigation is not required.

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3.18 TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (EIR) discusses the existing setting as it relates to tribal cultural resources and evaluates the potential for the proposed Project to impact tribal cultural resources. This section summarizes pertinent information from the Native American consultation process between the City of Lake Elsinore (City) and the Native American tribes described below.

Data from the *Historical/Archaeological Resources Assessment, Baker Industrial Project, City of Lake Elsinore, Riverside County, California* (Historical/Archaeological Resources Assessment; Appendix E-1 [provided under confidential cover]),[1] the *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California* (Cultural Resources Addendum; Appendix E-2 [provided under confidential cover]),[2] the City of Lake Elsinore General Plan, the City of Lake Elsinore General Plan EIR, and the City of Lake Elsinore Municipal Code are also incorporated into this section. Appendix E-1 and Appendix E-2 are under confidential cover in this Draft EIR but are available for review at Lake Elsinore City Hall (130 South Main Street, Lake Elsinore, CA 92530).

3.18.1 Scoping Process

The potential of the proposed Project to impact tribal cultural resources was not identified as an area of concern during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received one comment letter in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to tribal cultural resources. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to tribal cultural resources included comments from the following:

- The California Native American Heritage Commission (NAHC), July 19, 2024, detailing State procedures for compliance with Assembly Bill (AB) 52, Senate Bill (SB) 18, and other State regulations related to tribal resources and the California Environmental Quality Act (CEQA).

3.18.2 Existing Environmental Setting

The proposed Project is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within Riverside County, Lake Elsinore, and the Project site as it relates to tribal cultural resources.

The approximately 140.04-acre Project site consists of undeveloped land and public road rights-of-way (ROWs). The Project site consists of four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of ROW improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs;

[1] CRM Tech. 2024. *Historical/Archaeological Resources Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* January 18. Appendix E-1 (confidential: not for public distribution).

[2] CRM Tech. 2025. *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* May 28. Appendix E-2 (confidential: not for public distribution).

a 33.65-acre Restoration Area to be used for future conservation and restoration activities; and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

3.18.2.1 Geology and Topography

The Project site is irregular in shape and generally bounded by undeveloped land in all directions. The Project site includes segments of Nichols Road, Pierce Street, and Baker Street. Structural foundations from one former residence are located within the Onsite Development Area, and structural foundations from two former residences are located within the Restoration Area, generally along Baker Street. Existing residential uses (two single-family homes) are located outside of and adjacent to the west of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area) along Pierce Street, and an above-ground water storage tank and a residence are located outside of and adjacent to the southeast of the Project site (adjacent to the Onsite Development Area and Offsite Improvement Area, respectively). All the existing residential and institutional uses are outside the Project site limits. The Project site has a history of limited agriculture use. Elevations within the Project site range approximately between 1,260 feet and 1,400 feet above mean sea level, inclining gradually to the north and the southwest, with the lowest elevations in the central portion.

The Geotechnical Evaluation[3] (Appendix G-1) prepared for the proposed Project found that the primary bedrock unit underlying the Project site is the Tertiary Silverado Formation. Surficial units consisting of undocumented artificial fill, topsoil, colluvium, and alluvium overlie the bedrock.

3.18.2.2 Cultural Context

Detailed prehistoric, ethnohistoric, and cultural context information has been developed as part of the confidential Cultural Resources Technical Report prepared for this project. Because cultural resources information is protected under Public Resources Code (PRC) §21082.3(c) and *CEQA Guidelines* §15120(d), sensitive details are not included in this public EIR. This EIR provides only a general summary appropriate for a public document. All technical data, analyses, and cultural context are incorporated by reference in the confidential report, which is available to qualified personnel upon request at Lake Elsinore City Hall (130 South Main Street, Lake Elsinore, CA 92530).

3.18.3 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.18.3.1 Federal Regulations

The National Historic Preservation Act of 1966 (NHPA). The NHPA requires that the federal government list significant historic resources on the National Register of Historic Places (NRHP). Federal agencies must consult the NRHP when planning to undertake or grant approval through permits for a project. Prior to the issuance of any license or implementation of any project, the federal agency must consider the effects of a project or license on any historical buildings, sites, structures,

[3] LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California*. January 31. Appendix G-1.

or objects that are included on, or eligible for inclusion on, the NRHP (16 United States Code [USC] Section 470(f)). This typically includes consultation with the federal agency responsible for the undertaking; the State Historic Preservation Officer (SHPO); local Native American groups and individuals; local and State historical societies and organizations; and relevant archival sources, including the appropriate facility of the California Historical Resources Information System (CHRIS).

Archaeological Resources Protection Act. The Archaeological Resources Protection Act was enacted in 1979 by the federal government with the purpose of securing the protection of archaeological resources and sites on public lands and Native American lands, and to foster increased cooperation and exchange of information between governmental authorities, the professional archaeological community, and private individuals.

Native American Graves Protection and Repatriation Act. The Native American Graves Protection and Repatriation Act (NAGPRA) describes the rights of Native American lineal descendants, Indian tribes, and Native Hawaiian organizations with respect to the treatment, repatriation, and disposition of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony, referred to collectively in the statute as cultural items, with which they can show a relationship of lineal descent or cultural affiliation. It requires that federal agencies and museums receiving federal funds inventory holdings of Native American human remains and funerary objects and provide written summaries of other cultural items.[4]

3.18.1.1 State Regulations

Assembly Bill 52 Tribal Consultation. California PRC Section 21080.3.1 and Chapter 532, Statutes 2014 (i.e., AB 52), require that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource, as defined, is a project that may have a significant effect on the environment. The bill requires a lead agency to begin consultation with each California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and requests consultation prior to determining whether a Negative Declaration (ND), Mitigated Negative Declaration (MND), or EIR is required for a project. AB 52 specifies examples of mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. The bill makes the above provisions applicable to projects that have a NOP, or a notice of ND or MND filed on or after July 1, 2015. By requiring the lead agency to consider these effects relative to tribal cultural resources and to conduct consultation with California Native American tribes, this bill imposes a State-mandated local program.

Native American Heritage Commission. In 1976, the California State Government passed AB 4239, creating the NAHC. The NAHC is responsible for identifying and categorizing Native American cultural resources, as well as preventing damage to designated sacred sites and associated artifacts and remains. Legislation passed in 1982 authorized the NAHC to identify a Most Likely Descendant (MLD) when Native American remains are found outside the boundaries of a designated cemetery. An MLD

[4] National Park Service (NPS). *The Native American Graves Protection and Repatriation Act (NAGPRA).* Website: https://www.nps.gov/subjects/nagpra/index.htm (accessed May 2025).

has the authority to make recommendations with regard to the treatment and disposition of the discovered remains.

California Public Resources Code Sections 5097.9–5097.991. PRC Sections 5097.9–5097.991 provide protection to Native American historical and cultural resources (including sanctified cemeteries, places of worship, religious sites, or sacred shrines) and sacred sites and gives the NAHC enforcement authority. PRC Section 5097.98 outlines procedures that must be followed in the event human remains are discovered. The County Coroner shall make a determination within 2 working days from the time the person responsible for the excavation, or their designee, notifies the County Coroner of the discovery or recognition of the human remains. If the County Coroner identifies the remains to be of Native American origin or has reason to believe that the remains are those of Native American origin, the County Coroner must contact the California NAHC within 24 hours. The NAHC representative will then alert a Native American MLD to conduct an inspection of the site and to determine the following course of treatment and action.

California Health and Safety Code Section 7050.5. California HSC Section 7050.5 states that in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the County Coroner must notify the NAHC within 24 hours of this identification. The NAHC will identify a Native American MLD to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

3.18.3.2 Regional Regulations

There are no regional policies or regulations that are applicable to tribal cultural resources relevant to the proposed Project.

3.18.3.3 Local Regulations

City of Lake Elsinore General Plan, Chapter 4.0, Resource Protection and Preservation. Chapter 4.0 of the City of Lake Elsinore General Plan describes tribal cultural resources within the city. The following goals and policies apply to the proposed Project:

- **Goal 6:** Preserve, protect, and promote the cultural heritage of the City and surrounding region for the education and enjoyment of all City residents and visitors, as well as for the advancement of historical and archeological knowledge.
    - **Policy 6.1:** Encourage the preservation of significant archeological, historical, and other cultural resources located within the City.
    - **Policy 6.3:** When significant cultural/archeological sites or artifacts are discovered on a site, coordination with professional archeologists, relevant state and, if applicable, federal agencies, and the appropriate Native American tribes regarding preservation of sites or professional retrieval and preservation of artifacts or by other means of protection, prior to development of the site shall be required. Because ceremonial items and items of cultural

patrimony reflect traditional religious beliefs and practices, developers shall waive any and all claims to ownership and agree to return all Native American ceremonial items and items of cultural patrimony that may be found on a project site to the appropriate tribe for treatment. It is understood by all parties that, unless otherwise required by law, the site of any reburial of Native American human remains or cultural artifacts shall not be disclosed and shall not be governed by public disclosure requirements of the California Public Records Act.

- **Policy 6.4:** If archeological excavations are recommended on a project site, the City shall require that all such investigations include Native American consultation, which shall occur prior to project approval.

- **Goal 7:** Support state-of-the-art research designs and analytical approaches to archeological and cultural resource investigations while also acknowledging the traditional knowledge and experience of the Native American tribes regarding Native American culture.

  - **Policy 7.1:** Consult with California Native American tribes prior to decision-making processes for the purpose of preserving cultural places located on land within the City's jurisdiction that may be affected by the proposed plan, in accordance with State or Federal requirements.

  - **Policy 7.2:** Continue to identify, document, evaluate, designate, and preserve the cultural resources in the City.

3.18.4 Methodology

To assess the impacts of the proposed Project on tribal cultural resources, CRM TECH prepared a Historical/Archaeological Resources Report for the Project site in January 2024, which included a cultural resource literature and records search and a field survey.

3.18.4.1 Records Search Methodology

A cultural resource records search was conducted on October 2 and 10, 2023, of the NAHC's SLF. This search included a review of all recorded historic and prehistoric cultural resources, as well as a review of known cultural resources, and any survey and excavation reports generated from projects located within 1 mile of the proposed Project site. Additionally, a review was conducted of the NRHP, the CRHR, and documents and inventories from the California Office of Historic Preservation, including the list of California Historical Landmarks, California Points of Historical Interest, Listing of National Register Properties, and Inventory of Historic Structures.

3.18.4.2 Native American Consultation

In accordance with the requirements of AB 52, on March 6, 2024, the City sent letters to the following Native American tribes that may have knowledge regarding tribal cultural resources in the Project vicinity.

- Agua Caliente Band of Cahuilla Indians (Agua Caliente)
- Morongo Band of Mission Indians (Morongo)
- Pechanga Band of Indians (Pechanga)

- Rincon Band of Luiseño Indians (Rincon)
- Soboba Band of Luiseño Indians (Soboba)
- Torres Martinez Desert Cahuilla Indians (Torres Martinez)

Of the tribes notified, the Rincon Band of Luiseño Indians, the Pechanga Band of Indians, and the Soboba Band of Luiseño Indians requested formal government-to-government consultation under AB 52. Consultation meetings were held on May 9, 2024, with Rincon; on June 24, 2024, with Soboba; and on May 8, 2024, with Pechanga. Subsequent consultation meetings were held with Pechanga on December 19, 2024, April 22, 2025, and October 14, 2025; with Soboba on December 17, 2024, April 17, 2025, and October 8, 2025; and with Rincon on July 23, 2025. The City concluded consultation with Rincon on July 31, 2025; with Soboba on November 24, 2025; and with Pechanga on November 26, 2025.

The consulting tribes expressed concern that the Project area is sensitive for cultural resources and there is the possibility that previously unidentified resources might be found during ground-disturbing activities. Recommended mitigation measures (MMs) and regulatory compliance measures (RCMs) have been added to address unanticipated encounters with tribal cultural resources, including human remains. These measures are incorporated into this Draft EIR as **MMs CUL-1** through **CUL-7** (see Section 3.5.8, Cultural Resources).

Native American Heritage Commission. The NAHC was contacted on September 14, 2023, to determine whether any sacred sites were listed in the Sacred Lands File (SLF) for the proposed Project site and general vicinity. The NAHC also provided a contact list for tribal groups or individuals who may have knowledge of cultural resources within the area. In compliance with AB 52, letters were mailed to all parties, including tribes and individuals that had previously requested notification and the opportunity for consultation on applicable projects in the city. As part of the AB 52 consultation process, and in response to Pechanga's request for notification once the Project begins the entitlement process, the City sent consultation initiation request letters to Pechanga, Soboba, Rincon, Morongo, Agua Caliente, and Torres Martinez on March 6, 2024, to inform interested tribes about the proposed Project and to request information regarding tribal cultural resources on and near the Project site. From this initial correspondence, Pechanga and Soboba engaged in formal consultation with the City regarding the proposed Project.

CRM TECH contacted the nearest local Native American groups as recommended by the NAHC, including Pechanga and Soboba, in writing between September 14, 2023, and December 5, 2023, for further information on potential Native American cultural resources in the Project vicinity and to arrange for tribal participation in the upcoming archaeological field survey. Soboba has not provided any further comments; however, Pechanga indicated in a letter dated November 13, 2023, that the Project site holds a high potential for Native American cultural resources and expressed an interest in participating further in this Project. Pechanga discussed three SLF localities ranging from 0.85 to 1.71 miles in distance from the Project site and indicated the Project site contained a water source and that the native soils below the plow line appeared intact. Based on these factors, Pechanga requested notification once the Project begins the entitlement process, copies of all cultural documentation, government-to-government consultation, and an opportunity to make further recommendations such as tribal monitoring.

3.18.4.3 Field Survey Results

Pechanga and Soboba both participated in the intensive pedestrian field survey that was completed for this project on November 3, 2023, and December 6, 2023, with CRM TECH archaeological consultants.

The intensive-level field survey was conducted in two phases. On November 3, 2023, CRM TECH and the Consulting Tribes surveyed the majority of the Project site by walking a series of parallel northeast-southwest transects spaced 15 meters (approximately 50 feet) apart. Ground visibility was generally poor (5–10 percent) over the property due to dense vegetation except where past development disturbances, vehicular intrusions, or recent soil testing had cleared the vegetation and/or prevented vegetation growth. On December 6, 2023, CRM TECH and the Consulting Tribes surveyed the remainder of the Project site. This part of the survey was conducted along parallel transects at 5- to 10-meter (approximately 15- to 30-foot) intervals. Similar to the initial survey, visibility of the native ground surface was poor (5–10 percent) over most of the acreage due to the presence of dense vegetation as well as pavement along Nichols Road. In light of past ground disturbances on the Project site, including past agricultural operations, construction activities associated with Nichols Road, and former residences on the Project site, the reduced ground visibility was not considered a significant hindrance to the survey efforts.

3.18.4.4 Results

According to the South Coastal Information Center (SCIC) records search results, at least seven cultural resource surveys completed between 1996 and 2013 covered portions of the Project site, primarily on the northwestern portion of the site. As a result of the previous studies, seven cultural resources were recorded in the Project area. Three of these cultural resources were recorded as lying within or partially within the Project site boundaries, including an isolate[5] of prehistoric (i.e., Native American) origin.

- **Isolate 33-023880:** Recorded in 2013, Isolate 33-023880, represents the location of a single lithic flake found in a trench along Pierce Street, in the northeast portion of the Project site, within the Offsite Improvements Area. The flake was analyzed, recorded on California Department of Parks and Recreation (DPR) forms, and reburied in the trench following recordation. There is no potential for further impact to this resource due to it being an isolated artifact previously recorded on DPR forms.

The remaining four resources, including Site 33-004110, which is a prehistoric artifact scatter, are not located within the Project site boundaries.

- **Site 33-004110:** Recorded in 1990, Site 33-004110 was documented as a “fairly dense scatter” of groundstone and flaked-stone artifacts along Collier Avenue, then a narrow dirt road lying slightly to the north of its current alignment at that location. The location of the site has been developed, and the site presumably no longer exists. The site location is not part of the proposed Project.

[5] An isolate refers to a locality with fewer than three artifacts.

For a summary of historic-period and non-Native American cultural resources, refer to Section 3.5 of this Draft EIR.

3.18.5 Thresholds of Significance

The thresholds for tribal cultural resources impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines*. The proposed Project may be deemed to have a significant impact with respect to tribal cultural resources if it would:

Threshold 3.18.1: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (i) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or (ii) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.18.6 Project Impacts

Threshold 3.18.1(i): **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: 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. The City consulted with tribal representatives traditionally or culturally affiliated with the Project site pursuant to the requirements of AB 52. On September 14, 2023, CRM TECH submitted a written request to the NAHC for a records search of the SLF. On November 9, 2023, the NAHC responded to CRM TECH's inquiry and indicated that the SLF identified unspecified Native American cultural resources in the Project vicinity and provided a list of Native American groups to be consulted for further information. The NAHC provided a referral list of 34 individuals associated with 18 local tribes who may have knowledge of such resources. Confidential **Appendix E-1** provides the NAHC's response letter, including the results of the SLF search and the list of recommended tribal contacts. CRM TECH contacted the nearest local Native American groups as recommended by the NAHC, and those most likely to place significance on any resource found on site, including Pechanga and Soboba, in writing between September 14, 2023, and December 5, 2023, for further information on potential Native American cultural resources in the Project vicinity. Pechanga indicated in a letter dated November 13, 2023, that in the Tribe's opinion, the Project site holds a high

potential for Native American cultural resources and expressed an interest in participating further in this Project. Pechanga discussed three SLF localities ranging from 0.85 to 1.71 miles from the Project site and indicated the Project site contained a water source and that the native soils below the plow line appeared intact. Based on these factors, Pechanga requested notification once the Project begins the entitlement process, as well as copies of all cultural documentation, government-to-government consultation, and an opportunity to make further recommendations such as tribal monitoring.

As discussed above in Section 3.18.2, the SCIC results identified Isolate 33-023880, a single lithic flake previously documented and recorded in a trench along Pierce Street, within the Offsite Improvement Area. The flake was analyzed and reburied in the trench following recordation. As an isolated artifact, Isolate 33-023880 does not retain enough integrity to be listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). The field survey found no additional cultural resources at or near the location of Isolate 33-023880.

Grading for the proposed Project would require approximately 50,000 cubic yards of cut (soil export). Excavation depths for rough grading, compaction for building foundations, and utility trenching would reach between 0 feet and 100 feet below the existing grades on the Project site. Although no tribal cultural resources were identified during the field survey, the proposed Project must comply with all applicable regulations protecting archaeological resources, as there is at least some potential for unknown subsurface archaeological tribal resources to be encountered during ground-disturbing activities.

As part of the AB 52 consultation process, and in response to Pechanga's request for notification once the Project begins the entitlement process, the City sent consultation initiation request letters to California Native American tribes traditionally and culturally affiliated with the geographic area of the proposed Project that had requested, in writing to the City, to be informed of proposed projects in that geographic area. Tribes on the City's AB 52 list include Pechanga, Soboba, Rincon, Morongo, Agua Caliente, and Torres Martinez. Letters were distributed on March 6, 2024, to inform interested tribes about the proposed Project and to request information regarding tribal cultural resources on and near the Project site. From this initial correspondence, Pechanga and Soboba engaged in formal consultation with the City regarding the proposed Project and established mitigation measures and RCMs to address unanticipated encounters with tribal cultural resources, including human remains. These measures are incorporated into this Draft EIR as **MMs CUL-1** through **CUL-7** (see Section 3.5.8, Cultural Resources) and set forth procedures for handling discovery of any potential cultural, tribal cultural, or archaeological resources as a result of Project-related construction activities. With implementation of the proposed mitigation measures, impacts would be less than significant.

Threshold 3.18.1(ii): Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1,

the lead agency shall consider the significance of the resource to a California Native American tribe?

As noted above under Threshold 3.18.1(ii), the SCIC results identified Isolate 33-023880, a single lithic flake previously documented and recorded in a trench along Pierce Street, within the Offsite Improvement Area. The flake was analyzed and reburied in the trench following recordation. As an isolated artifact, Isolate 33-023880 does not retain enough integrity to be listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). As previously stated, the field survey found no additional cultural resources at or near the location of Isolate 33-023880.

Pursuant to AB 52, Pechanga and Soboba engaged in formal consultation with the City regarding the proposed Project and recommended mitigation measures and RCMs to address unanticipated encounters with tribal cultural resources, including human remains. These measures are incorporated into this Draft EIR as **MMs CUL-1** through **CUL-7** (see Section 3.5.8, Cultural Resources) and set forth procedures for handling discovery of any potential cultural, tribal cultural, or archaeological resources as a result of Project-related construction activities.

3.18.7 Level of Significance Prior to Mitigation

Although there is no evidence of tribal cultural resources at the Project site, prior to mitigation, potentially significant impacts to unidentified resources that qualify as tribal cultural resources have the potential to occur during ground-disturbing activities.

3.18.8 Compliance Measures and Mitigation Measures

3.18.8.1 Compliance Measures

No compliance measures are applicable to the proposed Project.

3.18.8.2 Mitigation Measures

MM CUL-1 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

MM CUL-2 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

MM CUL-3 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

MM CUL-4 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

MM CUL-5 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

MM CUL-6 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

MM CUL-7 (Refer to Section 3.5, Cultural Resources, of this Draft EIR.)

3.18.9 Level of Significance after Mitigation

Implementation of **MMs MM CUL-1** though **CUL-7** would ensure the Project would include Native American and professional archaeological monitoring during ground-disturbing activities to evaluate any cultural, tribal cultural, or archaeological resources that may be encountered as a result of Project-related construction. Excavation and/or construction activities would cease if cultural, tribal cultural, archaeological resources, or human remains are identified, and they would be evaluated by the archaeological monitor and tribal monitor/consultant. With implementation of **MMs CUL-1** though **CUL-7**, potential impacts to tribal cultural resources would be reduced to **less than significant with mitigation incorporated**.

3.18.10 Cumulative Impacts

Potential impacts to known or unknown tribal cultural resources may result from cumulative development in the city and within the traditional habitation areas of consulting tribes may contribute to cumulatively significant impacts to these resources. However, each development proposal received by the City is required to undergo individual environmental review pursuant to CEQA, including engaging interested tribal governments in consultation pursuant to AB 52, as applicable. Accordingly, the City maintains a standard practice of consulting with interested tribes and providing site-specific cultural assessments to consulting tribes for review and comment during the consultation process, which provides a larger and more inclusive review of individual projects that may nevertheless be cumulatively considerable.

Specific to the proposed project, the City, in consultation with Pechanga and Soboba, has established **MMs CUL-1** through **CUL-7** (see Section 3.5.8, Cultural Resources) and set forth procedures for handling discovery of any potential cultural, tribal cultural, or archaeological resources as a result of Project-related construction activities and to ensure the dignified treatment of unanticipated encounters with human remains.[6]

Future discretionary projects in the city are expected to be evaluated individually and collectively for impacts to cultural resources, including tribal cultural resources, and be subject to the provisions of AB 52 for consultation with interested Native American tribes, at which time site-specific mitigation measures would be recommended by consulting tribes and implemented for potential encounters with tribal cultural resources during project construction. Consultation with interested tribal governments, including the implementation of measures to safeguard identified tribal cultural resources, is required prior to completion of the CEQA process. Completion of the consultation processes required under AB 52 and the incorporation of applicable measures as project-specific conditions or mitigation required for each project would render cumulative impacts to cultural resources less than significant. Therefore, with implementation of **MMs CUL-1** through **CUL-7,** Project impacts pertaining to tribal cultural resources would be **less than cumulatively considerable** when considered in conjunction with past, present, and future projects.

[6] The Rincon Band of Luiseño Indians deferred to the Pechanga Band of Indians and the Soboba Band of Luiseño Indians for the proposed Project.

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3.19 UTILITIES AND SERVICE SYSTEMS

This section of the Draft Environmental Impact Report (EIR) identifies the utility providers within whose jurisdiction the proposed Project is located and evaluates the potential impacts of the proposed Project on utilities and service systems. This section addresses the following utilities:

- Electricity (Southern California Edison [SCE])
- Solid Waste (CR & R Inc. Environmental Services)
- Wastewater and Potable Domestic Water (Elsinore Valley Municipal Water District [EVMWD])
- Storm Drainage and Flood Control (Riverside County Flood Control and Water Conservation District)
- Telecommunication (Verizon and Time Warner Cable)

This section is based in part on information from the City of Lake Elsinore (City) General Plan, City of Lake Elsinore General Plan EIR, City of Lake Elsinore Municipal Code, EVMWD's Urban Water Management Plan (UWMP),[1] and EVMWD's Sewer System Management Plan.[2]

3.19.1 Scoping Process

Potential impacts to utilities and service systems were not specifically identified during the public scoping meeting held on August 1, 2024, for the proposed Project, although members of the public did comment that utilities and services should be studied. The City received three comment letters in response to the Notice of Preparation (NOP) issued between July 19 and August 19, 2024, concerning the proposed Project's potential impacts to utilities and service systems. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR. NOP comments related to utilities and service systems included comments from the following:

- Jefrey Ong, July 10, 2024, expressing concern regarding strain on existing infrastructure with implementation of the proposed Project.
- The Riverside County Department of Waste Resources, July 15, 2024, requesting the Draft EIR consider the Project's waste generation and provided information to be used in the analysis of solid waste impacts, and that the Draft EIR incorporate measures to comply with State regulations regarding solid waste, including Assembly Bill (AB) 75, AB 1826, and Senate Bill (SB) 1383.
- Lee and Associates, July 16, 2024, expressing concern regarding the location or replacement of SCE utility equipment.

[1] Elsinore Valley Municipal Water District (EVMWD). 2021. 2020 Urban Water Management Plan. June.
[2] Elsinore Valley Municipal Water District (EVMWD). 2018. Elsinore Valley Municipal Water District Sewer System Management Plan. October. Revised 2022.

3.19.2 Methodology

The impact analysis presented in this section evaluates potential physical impacts of the proposed Project on utilities and service systems and considers whether implementation of the proposed Project would result in the need for additional infrastructure and supplies based on data and adopted planning documents obtained through service providers and their respective websites, the City of Lake Elsinore General Plan, and the City of Lake Elsinore General Plan EIR.

3.19.3 Existing Environmental Setting

The Project site is located in Lake Elsinore, Riverside County, California. This section describes the existing environmental setting within the city and the Project site as it relates to utilities and service systems.

3.19.3.1 Water

Potable and reclaimed water service in the city is provided by the EVMWD. The EVMWD also provides potable and reclaimed water services to the cities of Canyon Lake and Wildomar, portions of the city of Murrieta, and unincorporated portions of Riverside and Orange counties. EVMWD is a special district whose powers include the provision of public water service, water supply development and planning, wastewater treatment and disposal, and recycling.

EVMWD is a subagency of the Western Municipal Water District (Western Water), which is a member agency of the Metropolitan Water District of Southern California (MWD). According to EVMWD's UWMP, the agency's potable water supply includes local groundwater from the Elsinore Groundwater Basin via 13 operating groundwater wells, surface water from the Canyon Lake Reservoir via the Canyon Lake Water Treatment Plant (WTP), and imported water from the MWD through the Auld Valley Pipeline and Temescal Valley Pipeline. EVMWD's water system currently includes 33 pressure zones. Within these zones, EVMWD operates approximately 3,063,000 feet (580 miles) of pipelines ranging in diameter from 3 inches to 42 inches, 67 storage reservoirs with an approximate total storage capacity of 83 million gallons, and 46 booster pump stations.

EVMWD's service area is broken into two divisions, the Elsinore Division and the Temescal Division (also known as the Temescal Domestic Service Area). The Elsinore Division makes up most of the service area, with approximately 43,849 active connections, encompassing an area of 96 square miles. The Temescal Division Service Area is located northwest of the EVMWD service area and is a self-sustained water division, hydraulically separated from EVMWD. It covers an area of approximately 2.5 square miles and has approximately 711 active connections. In 2020, EVMWD reported more than 44,560 water, wastewater, and agricultural service connections across both the Elsinore Division and the Temescal Domestic Service Area.

EVMWD's existing recycled water demands are supplied by tertiary-treated wastewater from the Regional Water Reclamation Facilities (WRF), Railroad Canyon WRF, and Horsethief Canyon WRF. In the effort to minimize the need for imported water, EVMWD plans to expand its recycled water system to provide recycled water for irrigation users and to maintain water levels in Lake Elsinore

during normal and dry years. In addition, EVMWD has recently implemented or is planning to implement the following projects to increase the reliability of its supplies:[3]

- Palomar well replacement (completed in 2024)
- Lee Lake Basin wells (completed in July 2025)
- Treatment upgrades at the Canyon Lake WTP (anticipated to be completed in 2027)
- Temescal Pauba groundwater well (anticipated to be completed in 2032)
- Indirect Potable Reuse (IPR) at the Regional Wastewater Reclamation Facility (anticipated to be completed in 2035)

According to EVMWD's UWMP, adopted by EVMWD on June 10, 2021, water supply and demand analysis indicates that the EVMWD would have sufficient supplies available during normal years, single dry years, and 5-year consecutive droughts. Under normal, single dry, and 5 consecutive dry years conditions, EVMWD anticipates a surplus of water and would be able to meet potable and nonpotable demands. As the planning horizon is extended, the total potable and nonpotable surplus would be reduced. The nonpotable demand is mainly attributed to maintaining the Temescal Wash and Lake Elsinore requirements. It is expected that any excess recycled water will be used for the IPR project. The single dry year scenario is the worst-case scenario, as it assumes that natural runoff from Canyon Lake would be 178 acre-feet per year (AFY). During years of extreme drought (i.e., single year and 5 consecutive dry years conditions), EVMWD could meet additional demands by purchasing more treated or untreated imported water to mitigate this impact.

In the vicinity of the Project site, EVMWD owns and operates a 20-inch water line in Baker Street that supplies the Baker Reservoir.

3.19.3.2 Wastewater

The EVMWD Sewer District provides wastewater and sewer services in the city, the cities of Canyon Lake and Wildomar, portions of the city of Murrieta, and unincorporated portions of Riverside County. Wastewater in the city is collected by trunk sewers, which are generally 10 inches in diameter, that convey wastewater to EVMWD's WRFs. EVMWD's existing wastewater collection systems consist of approximately 358 miles of sewer mains up to 54 inches in diameter, 33 lift stations, and 3 WRFs.

Wastewater flows within EVMWD's current service area are conveyed to WRFs on the basis of proximity. Wastewater flows conveyed in the Regional, Canyon Lake, and Horsethief collection systems are treated by EVMWD's Regional, Railroad Canyon, and Horsethief Canyon WRFs, respectively. Wastewater flow from the southern part of EVMWD's service area is conveyed through the Rancho California Water District's (RCWD) wastewater collection system to the RCWD-operated Santa Rosa WRF for treatment. It should be noted that future wastewater flows generated within the Horsethief Canyon collection system will be routed to the planned Alberhill WRF for treatment. The

[3] Elsinore Valley Municipal Water District (EVMWD). 2023. 2023 Water Shortage Contingency Plan. November.

City is located within the Regional collection system, and wastewater in the city is conveyed to the Regional WRF.

The Regional collection system contains sewer mains up to 54 inches in diameter, approximately 66 miles of which are 10 inches in diameter and larger. The Regional collection system contains 28 lift stations and associated force mains. The Regional WRF currently processes 8 million gallons of wastewater per day. In June 2023, the EVMWD's Board of Directors approved the expansion of the Regional WRF to increase its capacity by 4 million gallons per day. Improvements at the Regional WRF would consist of the following:[4]

- Addition of a new fine-screen facility
- Two new aeration basins
- A new membrane bioreactor facility
- A new ultraviolet disinfection facility
- A new belt press building
- Expansion of headworks
- Expansion of the influent pump station
- New odor control facilities

In the vicinity of the Project site, EVMWD owns and operates a 20-inch water line in Baker Street that supplies the Baker Reservoir, as well as a 15-inch sewer line at the intersection of Baker Street and Pierce Street.

3.19.3.3 Stormwater

The City and the Project site are within the Santa Ana regional watershed, which is drained by the Santa Ana River. The primary natural surface waters in the city include Lake Elsinore, the San Jacinto River, and Temescal Wash.[5] The drainage patterns in the city are divided into three basins: the Temescal Wash, Lake Elsinore, and Santa Margarita basin areas. According to the City's General Plan EIR, the Project site is within the Temescal Wash Basin Area.[6]

The City and the Project site are within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB). The Santa Ana RWQCB implements the National Pollutant Discharge Elimination System (NPDES) program in the city, primarily through the Riverside County Municipal Separate Storm Sewer System (MS4) Permit, which prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards. The Riverside County MS4 Permit requires co-permittees to develop and implement a standard design and post-development Best Management Practices (BMP) guidance to guide application of Low

4 Elsinore Valley Municipal Water District (EVMWD). EVMWD Undergoes Regional Water Reclamation Facility Expansion. June 30, 2023. Website: https://evmwd.com/evmwd-undergoes-regional-water-reclamation-facility-expansion/ (accessed December 2024).

5 City of Lake Elsinore. General Plan Update, Draft Program EIR, Section 3.9 Hydrology and Water Quality. August 2011.

6 City of Lake Elsinore. General Plan Update, Draft Program EIR, Section 3.9, Hydrology and Water Quality. August 2011.

Impact Development (LID) BMPs to the maximum extent practicable in order to treat and manage stormwater.

There is no existing stormwater infrastructure on the Project site. Due to the topography of the Project site, surface flows on the Project site sheet flow toward the center of the Project site under existing conditions.

3.19.3.4 Solid Waste

CR & R Inc. Environmental Services is responsible for solid waste disposal in the city of Lake Elsinore, as well as in the cities of Temecula and Canyon Lake and parts of the unincorporated portions of Riverside County. There are no landfills in the city. Solid waste is taken to either a landfill or the Materials Recovery Facility (MRF) in the nearby city of Perris. The Riverside County Department of Waste Resources (RCDWR) manages the landfills used by the city. The three landfills typically used by the City are the El Sobrante, Badlands Sanitary, and Lamb Canyon sanitary landfills. All three of the landfills are Class III municipal solid waste landfills. As shown in Table 3.19.A: Local Riverside County Landfills, the three landfills have a remaining permitted capacity for additional solid waste of 103,700,000 tons.

Table 3.19.A: Local Riverside County Landfills

Landfill	Nearest City	Maximum Permit Capacity (tons)	Remaining Permit Capacity (tons)[1]	Maximum Permitted Throughput (tons/day)	Estimated Closing Date
El Sobrante	Corona	209,910,000	47,200,000	16,054	1/1/2051
Badlands Sanitary	Moreno Valley	82,300,000	49,800,000	5,000	1/1/2059
Lamb Canyon Sanitary	Beaumont	39,681,513	6,700,000	5,000	4/1/2032
Total		**331,891,513**	**103,700,000**	**26,054**	**–**

Source 1: CalRecycle. n.d. El Sobrante Landfill. Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2280?siteID=2402 (accessed December 2024)
Source 2: CalRecycle. n.d. Badlands Sanitary Landfill. Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367 (accessed December 2024)
Source 3: CalRecycle. n.d. Lamb Canyon Sanitary Landfill. Website: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2246?siteID=2368 (accessed December 2024)
[1] Remaining capacity provided by the Riverside County Department of Waste Resources on August 15, 2024.
CalRecycle = California Department of Resources Recycling and Recovery
tons/day = tons per day

Based on proximity to the Project site, solid waste collected from the proposed Project would likely be transported to the El Sobrante Landfill, located approximately 8.2 miles northwest of the Project site. As shown in Table 3.19.A, above, the El Sobrante Landfill has a remaining capacity of 47,200,000 tons.

AB 939 changed the focus of solid waste management from landfill to diversion strategies such as source reduction, recycling, and composting. The purpose of the diversion strategies is to reduce dependence on landfills for solid waste disposal. AB 939 established mandatory diversion goals of 25 percent by 1995 and 50 percent by 2000. The California Department of Resources Recycling and Recovery (CalRecycle) tracks and monitors solid waste generation rates on a per capita basis. Per

capita solid waste generation rates and total annual solid waste disposal volumes for Lake Elsinore between 2018 and 2023 are shown in Table 3.19.B: Solid Waste Generation Rates in Lake Elsinore. It should be noted that more recent data have not yet been made publicly available.

Table 3.19.B: Solid Waste Generation Rates in Lake Elsinore

Year	Waste Generation Rates (lbs/person/day)		Total Disposal Tonnage (tons/yr)
	Per Resident	Per Employee	
2018	4.40	18.90	50,373.45
2019	4.70	20.00	44,712.45
2020	5.60	23.30	65,511.08
2021	5.00	23.90	64,601.63
2022	4.80	20.80	63,453.51
2023	5.30	22.50	69,114.28

Source: California Department of Resources Recycling and Recovery (CalRecycle). Countywide, Regionwide, and Statewide Jurisdiction Diversion/Disposal Progress Report, Riverside County – Lake Elsinore, 2018 through 2023. Website: https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DiversionDisposal, accessed December 2024.
lbs/person/day = pounds per person per day tons/yr = tons per year

The City is in compliance with State requirements to reduce the volume of solid waste through recycling and reuse of solid waste. In 2023, the City established a target waste generation of 5.30 pounds per person per day for residents and 23.30 pounds per person per day for employees. As shown in **Table 3.19.B**, the City has satisfied its target for 2023.

3.19.3.5 Electricity

According to the most recent data available, in 2023, California's electricity was generated primarily by natural gas (35.56 percent), solar (17.03 percent), large hydroelectric (11.70 percent), wind (11.17 percent), nuclear (9.34 percent), geothermal (4.83 percent), biomass (2.06 percent), small hydroelectric (1.77 percent), and other unspecified sources. Total electric generation in California in 2023 was 215,623 gigawatt-hours (GWh), which is up approximately 6.1 percent from the 2022 total generation of 203,257 GWh.[7,8]

Electricity in the city is provided by SCE. SCE is a subsidiary of Edison International and provides electricity for over 13 million customers, 5,000 large businesses, and 280,000 small businesses in 430 cities. SCE's electrical distribution system includes 16 utility interconnections, 4,990 transmission and distribution circuits, and 425 transmission and distribution crews. According to the California Energy Commission (CEC), total electricity consumption in the SCE service area in 2022 was 85,870 GWh

[7] California Energy Commission (CEC). 2023 Total System Electric Generation. 2023. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation (accessed December 2024).

[8] California Energy Commission (CEC). 2022 Total System Electric Generation. 2022. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation (accessed December 2024).

(31,604 GWh for the residential sector and 54,266 GWh for the nonresidential sector).[9] Total electricity consumption in Riverside County in 2022 was 17,786 GWh (9,061 GWh for the residential sector and 8,720 GWh for the nonresidential sector).[10]

3.19.3.6 Natural Gas

Natural gas consumed in California is used for electricity generation (45 percent), residential uses (21 percent), industrial uses (25 percent), and commercial uses (9 percent). California continues to depend on out-of-State imports for nearly 90 percent of its natural gas supply.[11]

Natural gas in the city is provided by the Southern California Gas Company (SoCalGas). SoCalGas is a regulated subsidiary of Sempra Energy and the nation's largest natural gas distribution utility, serving 19.5 million consumers through 5.5 million meters. The SoCalGas service territory encompasses 23,000 square miles in most of Central and Southern California. According to the CEC, total natural gas consumption in the SoCalGas service area in 2022 was 5,026 million therms (2,230 million therms for the residential sector and 2,796 million therms for the nonresidential sector).[12] Total natural gas consumption in Riverside County in 2022 was 431 million therms (284 million therms for the residential sector and 147 million therms for the nonresidential sector).[13]

3.19.3.7 Telecommunication Facilities

Verizon provides the local landline telephone service in the city, although long-distance services may also be obtained from a number of other providers. In addition, a number of companies provide wireless or cell phone services. Time Warner Cable provides cable television and high-speed internet.

3.19.4 Regulatory Setting

This section includes applicable federal, State, regional, and City policies and regulations.

3.19.4.1 Federal Regulations

Clean Water Act. Pursuant to Section 404 of the Clean Water Act (CWA) (33 United States Code [USC] Section 1251 et seq.), the United States Army Corps of Engineers (USACE) is authorized to regulate any activity that would result in the discharge of dredged or fill material into waters of the United States (including wetlands), which include those waters listed in 33 Code of Federal Regulations (CFR) 328.3 (as amended in 80 Federal Register (FR) 37104, June 29, 2015).

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9 California Energy Commission (CEC). 2022. Electricity Consumption by Entity. Website: https://ecdms.energy.ca.gov/elecbyutil.aspx (accessed December 2024).

10 California Energy Commission (CEC). 2022. Electricity Consumption by County. Website: https://ecdms.energy.ca.gov/elecbycounty.aspx (accessed December 2024).

11 California Energy Commission (CEC). Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed December 2024).

12 California Energy Commission (CEC). 2022. Gas Consumption by Entity. Website: https://ecdms.energy.ca.gov/gasbyutil.aspx (accessed December 2024)

13 California Energy Commission (CEC). 2022. Gas Consumption by County. Website: https://ecdms.energy.ca.gov/gasbycounty.aspx (accessed December 2024)

Pursuant to Section 401 of the CWA, the RWQCB, a division of the State Water Resources Control Board (SWRCB), is required to provide "certification that there is reasonable assurance that an activity that may result in the discharge to waters of the U.S. will not violate water quality standards." Water quality certification must be based on the finding that the proposed discharge will comply with applicable water quality standards.

The NPDES is the permitting program for discharge of pollutants into surface waters of the United States under CWA Section 402.

Safe Drinking Water Act. The Safe Drinking Water Act (SDWA) (42 USC Section 300f et seq.) is intended to protect public health by regulating the nation's public drinking water supply. The federal SDWA authorizes the United States Environmental Protection Agency (USEPA) to set national standards for drinking water to protect against both naturally occurring and man-made contaminants.

Resource Conservation and Recovery Act (42 USC §6901 et seq.). The federal Resource Conservation and Recovery Act (RCRA) was enacted in 1976 to ensure that solid and hazardous wastes are properly managed from their generation to their ultimate disposal or destruction. Implementation of the RCRA has largely been delegated to federally approved State waste management programs and, under Subtitle D, further promulgated to local governments for management of planning, regulation, and implementation of nonhazardous solid waste disposal. The USEPA retains oversight of State actions under CFR Title 40, Parts 239–259. Where facilities are found to be inadequate, Section 256.42 requires that necessary facilities and practices be developed by the responsible State and local agencies, or by the private sector. In California, that responsibility was created under AB 939, the California Integrated Waste Management Act, in 1989.

3.19.4.2 State Regulations

California Integrated Waste Management Act of 1989. The California Integrated Waste Management Act of 1989 (Public Resources Code [PRC] Division 30), enacted through AB 939 and modified by subsequent legislation, required all California cities and counties to implement programs to reduce, recycle, and compost at least 50 percent of wastes by 2000 (PRC §41780). The State determines compliance with this mandate to "divert" 50 percent of generated waste (which includes both disposed and diverted waste) through a complex formula. This formula requires cities and counties to conduct empirical studies to establish a "base year" waste generation rate against which future diversion is measured. The actual determination of the diversion rate in subsequent years is arrived at through deduction, not direct measurement: instead of counting the amount of material recycled and composted, the city or county tracks the amount of material disposed at landfills, then subtracts the disposed amount from the base year amount. The difference is assumed to be diverted (PRC §41780.2). The RCDWR has adopted a Countywide Integrated Waste Management Plan (CIWMP), which was prepared in accordance with the California Integrated Waste Management Act of 1989 (AB 939).

Urban Water Management Planning Act. The Urban Water Management Planning Act (UWMP Act) (California Water Code [CWC], Division 6, Part 2.6, §10610 et seq.) was enacted in 1983. The UWMP Act applies to municipal water suppliers (e.g., the EVMWD) because it provides water service directly to more than 3,000 connections. The UWMP Act requires these suppliers to update their UWMPs

every 5 years to demonstrate an appropriate level of reliability in supplying anticipated short-term and long-term water demands during normal, dry, and multiple dry years.

Porter-Cologne Water Quality Control Act. The CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources with the states, although it does establish guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the SWRCB and the nine RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface water and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Each RWQCB must formulate and adopt a water quality plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The City, including the Project site, is within the jurisdictional boundaries of the Santa Ana RWQCB (Region 8).

California Toxics Rule. As stated previously, because California had not established a complete list of acceptable water quality criteria for toxic pollutants, USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR). The CTR provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated for human health or aquatic life uses. The CTR is often used by the RWQCBs when establishing water quality objectives and TMDLs. Although the CTR criteria do not apply directly to discharges of stormwater runoff, they are utilized as benchmarks for toxics in urban runoff. The CTR is used as a benchmark to evaluate the potential ecological impacts of stormwater runoff to receiving waters. The CTR establishes acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without negative effects. Chronic criteria provide benchmarks for an extended period of time (i.e., 4 days or more) without negative effects. The acute CTR criteria have a shorter relevant averaging period (less than 4 days) and provide a more appropriate benchmark for comparison for stormwater flows.

CTR criteria apply to the receiving water body and are calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents (including copper, lead, and zinc) are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

General Construction Activity Storm Water Permit. The *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land*

Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002 (Construction General Permit)[14], adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least 1 acre of total land area. The Construction General Permit authorizes the discharge of stormwater to surface waters from construction activities.

The Construction General Permit requires that all developers of land where construction activities will occur over more than 1 acre do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three risk levels established in the General Permit;
- Eliminate or reduce nonstormwater discharges to storm sewer systems and other waters of the United States;
- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) that specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology/ Economically Achievable/Best Conventional Pollutant Control Technology standards as described in the CWA;
- Perform inspections and maintenance of all BMPs; and
- Conduct stormwater sampling, if required based on risk level.

To obtain coverage under the Construction General Permit, a project applicant must electronically file all permit registration documents with the SWRCB prior to the start of construction. Permit registration documents must include a:

- Notice of Intent (NOI);
- Risk assessment;
- Site map;
- SWPPP;
- Annual fee; and
- Signed certification statement.

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, and control pollutants from construction materials. The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

Sustainable Groundwater Management Act. The Sustainable Groundwater Management Act (SGMA) of 2014 is a comprehensive three-bill package that Governor Jerry Brown signed into California State law in September 2014. The SGMA provides a framework for sustainable management of

[14] State Water Resources Control Board (SWRCB). 2022. National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002. September 8. Effective September 1, 2023.

groundwater supplies by local authorities, with a limited role for State intervention if necessary to protect the resource. The plan is intended to ensure a reliable groundwater supply for California for years to come.

The SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts of groundwater basins. The SGMA requires the formation of local groundwater sustainability agencies (GSAs) that are required to adopt Groundwater Sustainability Plans to manage the sustainability of the groundwater basins.

California Water Conservation in Landscaping Act, Government Code §65591 et seq. Pursuant to the Water Conservation in Landscaping Act of 2006 (Government Code 65591 et seq.), cities and counties in California are required to adopt a water-efficient landscape ordinance. Local ordinances are intended to reduce water use for landscaping and irrigation purposes and encourage the use of recycled and reclaimed water for these purposes. The California Department of Water Resources maintains a Model Water Efficient Landscape Ordinance (MWELO) (California Code of Regulations [CCR] 490 23 et seq.) after which local jurisdictions can model their ordinances.

California Water Recycling in Landscaping Act, Government Code §65601 et seq. The California Water Recycling in Landscaping Act promotes the efficient use of water through the development of water recycling facilities. This Act stipulates that landscape design, installation, and maintenance should be water efficient, and the use of potable domestic water for landscaped areas is considered a waste or unreasonable use of water if recycled water is available that meets the conditions described in Section 13550 of the CWC.

Senate Bill 610. SB 610 requires that detailed information regarding water availability is provided to relevant city and county decision-makers prior to approval of specified large development projects (as defined in CWS Section 10912 [a]). Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA.[15]

Senate Bill 1374. SB 1374 requires that the annual report submitted to CalRecycle include a summary of the progress made in diversion of construction and demolition waste materials. In addition, SB 1374 required that CalRecycle adopt a model ordinance suitable for adoption by any local agency to require 50 to 74 percent diversion of construction and demolition waste materials from landfills by March 1, 2004. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CalRecycle's model by default. However, adoption of such an ordinance may be considered by CalRecycle when determining whether to impose a fine on a jurisdiction that has failed to implement its Source Reduction and Recycling Element (SRRE).

[15] California Department of Water Resources. 2003. *Guidebook for Implementation of SB 610 and SB 221 to Assist Water Suppliers, Cities, and Counties in Integrating Water and Land Use Planning.* October 10. Website: https://cawaterlibrary.net/document/guidebook-for-implementation-of-sb-610-and-sb-221-to-assist-water-suppliers-cities-and-counties-in-integrating-water-and-land-use-planning/ (accessed August 21, 2025).

Assembly Bill 75. AB 75, passed in 1999, took effect on January 1, 2000. This bill adds new provisions to the PRC, mandating that State agencies develop and implement an Integrated Waste Management Plan (IWMP); it also mandates that community service districts providing solid-waste services report disposal and diversion information to the city, county, or regional agency in which the community service district is loaded.

Title 24 of the California Code of Regulations. Energy and water consumption by new buildings in California is regulated by the California Green Building Standards Code (CALGreen), which is embodied in CCR Title 24. Title 24 provides efficiency standards for new construction and the rehabilitation of both residential and nonresidential buildings, including building energy consumption, water conservation, and operational efficiencies. Title 24 regulates building energy consumption for heating, cooling, ventilation, water heating, and lighting regarding both electricity and natural gas, while also regulating water consumption through the installation of efficient plumbing fixtures. The efficiency standards apply to both new construction and rehabilitation of both residential and nonresidential buildings. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed Title 24 Building Code requirements. The 2019 Standards went into effect January 1, 2020, following approval by the California Building Standards Commission.

Additionally, CALGreen Section 5.408.1 identifies that construction projects shall "recycle and/or salvage for reuse a minimum of 65 percent of the nonhazardous construction and demolition waste in accordance with Section 5.408.1.1, 5.408.1.2 or 5.408.1.3; or meet a local construction and demolition waste management ordinance, whichever is more stringent." The City of Lake Elsinore strives to meet the 75 percent diversion of solid waste to landfills as set forth by the State of California.

Assembly Bill 341. AB 341, enacted in 2011 and applicable beginning in 2012, changes the due date of the State agency waste management annual report to May. The bill makes a legislative declaration that it is the policy goal of the State of California that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020.

Public Health and Safety Code Part 9.5, Section 115700. Public Health and Safety Code Part 9.5, Section 115700, requires the proper decommissioning of inactive wells to prevent the contamination of groundwater. The section provides specifics for the casting, securing, and marking of wells and the surrounding area. This section also provides that at a minimum, permanently inactive wells shall be destroyed in accordance with standards developed by the RCDWR pursuant to CWC Section 13800 and adopted by the SWRCB or local agencies in accordance with CWC Section 13801. Minimum standards recommended by the RCDWR and adopted by the SWRCB or local agencies for the abandonment or destruction of groundwater monitoring wells or Class 1 hazardous injection wells shall not be construed to limit, abridge, or supersede the powers or duties of the department, in accordance with CWC Section 13801.

3.19.4.3 Regional Regulations

Elsinore Valley Municipal Water District 2020 Urban Water Management Plan. The EVMWD 2020 UWMP provides for a comprehensive planning analysis at a regional level; includes water use associated with residential, municipal, and industrial-sector projections; and lists and describes the

various uses, demand, supplies, target reductions, and compliance measures for the service area of approximately 96 square miles in southwestern Riverside County and eastern Orange County. These include the cities of Lake Elsinore and Canyon Lake, portions of Wildomar and Murrieta, and unincorporated portions of Riverside County and Orange County. The 2020 UWMP found that within the service area, retail water demands can be met with local or imported supplies. In the 2020 UWMP, the EVMWD's supply reliability assessments focus on the future demands for EVMWD imported and other supplies.

3.19.4.4 Local Regulations

City of Lake Elsinore General Plan, Chapter 3.0, Public Safety and Welfare. Chapter 3.0 of the City of Lake Elsinore General Plan provides the following goals and policies related to utilities:

- **Goal 12:** Ensure that adequate electrical, natural gas and telecommunications systems are provided to meet the demand of new and existing development.
    - **Policy 12.1:** Coordinate with the utility agencies to provide for the continued maintenance, development and expansion of electricity, natural gas, and telecommunications systems to serve residents and businesses.
    - **Policy 12.2:** Encourage developers to contact Southern California Edison early in their planning process, especially for large-scale residential and non-residential development or specific plans, to ensure the projected electric loads for these projects are factored into SCE's load forecasts for the community.
    - **Policy 12.3:** Encourage developers to incorporate energy efficient design measures into their projects and pursue available energy efficiency assistance programs from SCE and other utility agencies.
- **Goal 13:** Encourage the City's franchise trash hauler(s) to provide and expand service for the collection, storage, transportation, recovery, and disposal of solid waste to meet the needs of the City.
    - **Policy 13.1:** Request the City's franchise trash hauler(s) to establish long-term solid waste management plans that include goals for recycling and source reduction programs.
    - **Policy 13.2:** Request that the City's franchise trash hauler(s) provide a public education program in recycling and source reduction techniques for homes, businesses, and construction.
- **Goal 14:** Encourage the pursuit of state-of-the-art Information Technology.
    - **Policy 14.1:** Encourage the use of information technology as a communication tool to improve personal convenience, reduce dependency on nonrenewable resources, take advantage of ecological and financial efficiencies of new technologies.

- **Policy 14.2:** Maintain and update the City's website with information about current events and issues, key leadership figures, community involvement opportunities, and educational tools such as solid waste management techniques and emergency preparedness programs.

3.19.5 Thresholds of Significance

The thresholds for utilities and service systems impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines*. The proposed Project may be deemed to have a significant impact with respect to utilities and service systems if it would:

Threshold 3.19.1: 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,

Threshold 3.19.2: Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years,

Threshold 3.19.3: 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,

Threshold 3.19.4: Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, or

Threshold 3.19.5: Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.19.6 Project Impacts

Threshold 3.19.1: **Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

Less Than Significant Impact. The Project site is located in an urbanized area of the city, adjacent to existing development, that is currently served by existing utilities, including water, sanitary sewer, storm drainage, electricity, natural gas, and telecommunications infrastructure. Existing and proposed utility improvements and connections are discussed below. Figure 2-6 in Chapter 2.0, Project Description, depicts the proposed utility plan for water, sanitary sewer, and storm drainage infrastructure.

Water. The proposed Project would include the installation of a new EVMWD-operated 36-inch water transmission line in the Nichols Road and Baker Street rights-of-way (ROWs). The proposed transmission line would begin at the intersection of Nichols Road and Terra Cotta Road and would connect to the existing 20-inch water line in Baker Street that supplies the Baker Reservoir. The

proposed Project would connect to the proposed transmission line in Baker Street at two locations. One point of connection is proposed for Building 1 at the southeast corner of the building, and the second point of connection is proposed for Building 2 at the southeast corner of the building (refer to Figure 2-6). The proposed Project would also install 12-inch water lines that would loop around the proposed buildings to provide potable water and supply proposed fire hydrants. At the request of EVMWD, the proposed Project would also include the installation of a new EVMWD-operated 12-inch water line parallel to the proposed transmission line between the two proposed connection points.

Short-term demand for water is anticipated to occur during Project construction, associated with dust control, soil compaction, cleaning of tools or equipment, and construction worker use. However, this water use would be relatively minimal and would cease with completion of the proposed Project. Long-term demand for water is anticipated to occur during Project operation. As the Project site is currently undeveloped, it does not currently generate any demand for potable water service. Operation of the proposed Project would therefore represent an increase in water demand over existing conditions. According to EVMWD's UWMP,[16] the agency's potable water supply includes local groundwater, surface water from the Canyon Lake Reservoir, and imported water from the MWD. Water supply and demand analysis prepared as part of the UWMP indicates that the EVMWD would have sufficient supplies available during normal, single dry year, and 5-year drought conditions. The UWMP incorporates anticipated future populations and land uses from the City, as provided by the City's General Plan, into water demand estimates. Because the proposed Project is consistent with the existing Limited Industrial land use designation that applies to the Project site, development of the proposed Project has been included in the EVMWD's water supply and demand analysis, and sufficient supplies exist to serve the proposed Project.

In addition, pursuant to SB 610, a Water Supply Assessment (WSA)[17] was prepared for the proposed Project. The WSA indicates that the EVMWD included the proposed Project as a planned development in the UWMP (Reference No. 364), and that the anticipated water demand for the proposed Project is 52 AFY. In addition, according to the WSA, the EVMWD has a surplus of water to meet its projected demands, which include the proposed Project's anticipated demand of 52 AFY. Therefore, EVMWD's supplies are adequate to supply the proposed Project's demands. Additionally, the EVMWD has determined that water service is available to the proposed Project, as provided in a will-serve letter from EVMWD dated September 15, 2023 (Appendix O to this Draft EIR).

Given that EVMWD has sufficient water supplies to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years; the proposed Project has been included in EVMWD's UWMP, which has been confirmed in the WSA prepared for the proposed Project; and the Project has obtained a will-serve letter from EVMWD, implementation of the proposed Project would not require the relocation or construction of new or expanded

16 Elsinore Valley Municipal Water District (EVMWD). 2021. 2020 Urban Water Management Plan. June.

17 Carollo Engineers, Inc. 2025. *Baker Street Water Supply Assessment,* pages ES-1 through ES-3. April. Appendix J-3.

potable or recycled water facilities beyond the improvements to existing facilities detailed above. Impacts would be less than significant, and no mitigation measures are required.

Wastewater. Sanitary sewer service at the Project site is also provided by EVMWD. The proposed Project would include the installation of a new EVMWD-operated 8-inch sewer line in the Baker Street ROW from Pierce Street to the west entrance of Building 2. The proposed sewer line would connect to the existing 15-inch sewer line at the intersection of Baker Street and Pierce Street where it would convey wastewater to the existing Nichols Lift Station. The proposed Project would connect to the proposed sewer line in Baker Street at two locations. One point of connection is proposed for Building 1 on the east side of the building, and the second point of connection is proposed for Building 2 at the northeast corner of the building.

Short-term demand for wastewater services may occur during Project construction, associated with sanitary wastewater from portable toilet and handwashing stations. However, this wastewater generation would be relatively minimal and would cease with completion of the proposed Project. Long-term demand for wastewater services is anticipated to occur during Project operation. As the Project site is currently undeveloped, it does not currently generate any demand for wastewater services. Operation of the proposed Project would therefore represent an increase in wastewater services demand over existing conditions. Wastewater collected from the Onsite Development Area during Project operation would be conveyed to the Regional WRF. As previously discussed, the Regional WRF currently processes 8 million gallons of wastewater per day, and EVMWD plans on expanding its capacity by 4 million gallons per day in order to meet the growing demand for water and wastewater resources in Riverside County's fastest-growing region, for an ultimate capacity of 12 million gallons per day. As discussed in Section 3.14, Population and Housing, implementation of the proposed Project is expected to generate 483 permanent employees. According to the City's General Plan EIR, land within the City's Limited Industrial land use designation is estimated to generate 550 gallons of wastewater per day per acre upon build out.[18] The proposed Project would include the construction of two warehouses totaling 1,000,451 square feet (approximately 22.98 acres). As such, the proposed Project is estimated to generate 12,639 gallons of wastewater per day. This represents approximately 0.3 percent of the Regional WRF's current daily processing capacity and approximately 0.1 percent of its ultimate capacity. As such, the Regional WRF is anticipated to have sufficient capacity to accommodate wastewater from the proposed Project. In addition, the EVMWD has determined that wastewater service is available to the proposed Project, as provided in a will-serve letter from EVMWD dated September 15, 2023 (Appendix O).

The proposed Project would not require, nor would it result in, the construction of new wastewater treatment or collection facilities or the expansion of existing facilities beyond the improvements detailed above. Impacts related to the construction of wastewater treatment or collection facilities and the capacity of the wastewater treatment provider would be **less than significant**, and no mitigation would be required.

[18] City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR.* Section 3.16, Utilities and Service Systems, Table 3.16-4, Projected Wastewater Flow – General Plan Buildout (2030). August.

Stormwater Infrastructure. As discussed in Section 3.10, Hydrology and Water Quality, the proposed Project includes the installation of stormwater conveyance infrastructure to address stormwater runoff from the Project site and from the properties southwest of the Onsite Development Area. With implementation of the proposed Project, two new public 48-inch storm drain lines would collect stormwater from properties southwest of the Onsite Development Area and convey runoff through the Onsite Development Area to discharge into the Restoration Area northeast of Baker Street. Proposed on-site stormwater conveyance infrastructure would include private 24-inch storm drain lines that would collect stormwater from the developed area and convey runoff to the three proposed CMP detention systems and 11 proposed modular wetlands located throughout the Project site before discharging to the Restoration Area via storm drainpipes northeast of Baker Street. Rip rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows. The on-site stormwater facilities, CMP detention systems, and modular wetlands would be appropriately sized to detain the design capture volume in compliance with the Riverside County MS4 Permit so that stormwater runoff does not exceed the capacity of the existing stormwater drainage system.

Therefore, operational impacts related to creation or contribution of stormwater runoff that would exceed the capacity of existing or planned storm water drainage systems would be **less than significant** and no mitigation is required.

Electricity. Because the Project site is currently undeveloped, the Project site does not currently generate any electrical demand. The proposed Project would include connections to surrounding electrical infrastructure, and operation of the proposed Project would result in increased demand for electricity from SCE. Refer to Section 3.6, Energy, for a detailed discussion of the proposed Project's electricity usage.

As discussed in Section 2.0, Project Description, the proposed Project would include connections to the existing electricity infrastructure at the nearby Fogarty Substation via a distribution circuit extension along Terra Cotta Road to Nichols Road to Pierce Street, where it would interconnect to the Project facilities within the Onsite Development Area. No other improvements are proposed with respect to electrical infrastructure.

Project construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Transportation energy represents the largest energy use during construction and would occur from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction worker vehicles that would use petroleum fuels (e.g., diesel fuel and/or gasoline), rather than electricity. Electricity use during construction would be short-term, associated with powering tools and equipment, temporary lighting, temporary site infrastructure (such as portable generators), and operation system and controls (such as dewatering pumps), and would cease following completion of construction. As shown in Table 3.6.A in Section 3.6, the total electricity usage from Project construction related activities is estimated to be approximately 1,657,567 kilowatt-hours (kWh), which would increase the annual electricity consumption in Riverside County by less than 0.01 percent, representing a negligible effect on local and regional electrical infrastructure. Furthermore, impacts related to electricity use during construction would be temporary and relatively small in comparison to Riverside County's overall use of the State's available energy

resources. Overall, the amount of electricity anticipated under Project construction is not anticipated to exceed existing distribution capacity of the infrastructure serving the Project site, and construction activities are not expected to require new, unplanned, or physically altered electrical transmission or distribution facilities. Therefore, electricity demand during construction of the proposed Project would be less than significant, and mitigation is not required.

Energy use consumed by operation of the proposed Project would be associated with electricity consumption and fuel used for vehicle trips associated with the Project. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. In California, the California Building Standards Code Title 24 governs energy consumed by the built environment, mechanical systems, and some types of fixed lighting. Nonbuilding energy use, or "plug-in" energy use, can be further subdivided by specific end-use (refrigeration, cooking, appliances, etc.). As shown in Table 3.6.B in Section 3.6, the estimated potential increase in electricity demand associated with operation of the proposed Project is 7,117,782 kWh per year, which would increase the annual electricity consumption in Riverside County by approximately 0.04 percent. As such, operation of the proposed Project would result in a minimal increase in annual electricity use in Riverside County and a minimal impact to electrical infrastructure within the vicinity of the project site. Overall, the amount of electricity anticipated under Project operation is not anticipated to exceed existing distribution capacity of the infrastructure serving the Project site, and operational activities are not expected to require new, unplanned, or physically altered electrical transmission or distribution facilities. Therefore, electricity demand during operational of the proposed Project would be less than significant, and mitigation is not required.

With the exception of the proposed connections to the existing electricity infrastructure at the nearby Fogarty Substation via a distribution circuit extension along Terra Cotta Road to Nichols Road to Pierce Street, the proposed project would not physically alter any existing electrical infrastructure. The extension of electrical infrastructure to/through the Project would conform to applicable design, construction, and maintenance requirements established by SCE. As such, the proposed project would have a **less than significant impact** associated with electric power and would not require or result in the relocation or construction of new or expanded electric power facilities. No mitigation is required.

Natural Gas. Because the Project site is currently undeveloped, the Project site does not currently generate any natural gas demand. The proposed Project would not include any new connections to natural gas infrastructure, and operation of the proposed Project would not include natural gas usage. Therefore, the proposed Project would not generate any new natural gas demand, and there would be **no impact** associated with natural gas.

Telecommunications. Telephone, cable, and internet services are located in the vicinity of the Project site and would be extended onto the Project site. Additionally, cable box locations would be carefully planned and coordinated with utility providers and the landscape architect to be unobtrusive and screened from public view where possible. The construction and expansion of these facilities would occur within the Offsite Improvements Area and Onsite Development Area during preparation and earthwork phases and are not expected to impact any telephone, cable, or internet services off site that serve the surrounding areas. Additionally, telecommunication

facilities are generally installed concurrently with utility expansions. Since utility interconnections, including telecommunications, would occur during preparation and earthwork phases, impacts associated with the expansion of telecommunications facilities are already considered in the overall analytical framework of this Draft EIR. Impacts associated specifically with the relocation or construction of new or expanded telecommunication facilities would be **less than significant**, and no mitigation measures would be required.

Threshold 3.19.2: Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. As discussed above under Threshold 3.19.1, the water supply and demand analysis prepared as part of the UWMP indicates that the EVMWD would have sufficient supplies available during normal, single dry year, and 5-year drought conditions. The UWMP incorporates anticipated future populations and land uses for the city, as provided by the City's General Plan, into water demand estimates. Because the proposed Project is consistent with the Limited Industrial land use designation, development of the proposed Project has been included in the EVMWD's water supply and demand analysis, and sufficient supplies exist to serve the proposed project.

In addition, the WSA[19] prepared for the proposed Project confirmed that EVMWD included the proposed Project as a planned development in the UWMP (Reference No. 364), and that the anticipated water demand for the proposed Project is 52 AFY. According to the WSA, the EVMWD has a surplus of water to meet its projected demands, which include the proposed Project's anticipated demand of 52 AFY.[20] Therefore, EVMWD's existing supplies are adequate to accommodate the proposed Project's water demands. Further, EVMWD has a diverse supply portfolio that provides operational flexibility and reliability. In 2020, EVMWD relied on local groundwater to meet about 36 percent of its potable water demands, promoted the use of recycled water to offset potable water needs, and imported water to meet any remaining demands. EVMWD intends to continue promoting conservation, evaluating supplemental supplies, and participating in projects, when feasible, to ensure its water supply sources are protected and sustainable throughout the future. To adapt to unpredictable conditions, EVMWD will also continue to diversify its local water supply portfolio.[21]

As detailed in the project-specific WSA,[22] there are sufficient water supplies available to serve the proposed Project and reasonably foreseeable future development during the normal, single dry year, and multiple dry-year scenarios. Impacts would be **less than significant,** and mitigation is not required.

Threshold 3.19.3: Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity

19 Carollo Engineers, Inc. 2025. *Baker Street Water Supply Assessment,* pages ES-1 through ES-3. April. Appendix J-3.

20 Ibid.

21 Ibid.

22 Ibid.

to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. As discussed above under Threshold 3.19.1, wastewater generated within the Onsite Development Area by the proposed Project is estimated to be approximately 12,639 gallons of wastewater per day. This represents approximately 0.3 percent of the Regional WRF's current daily processing capacity, and approximately 0.1 percent of its ultimate capacity. In addition, the EVMWD has determined that wastewater service is available for the proposed Project, as provided in a will-serve letter from EVMWD dated September 15, 2023 (Appendix O). As such, the Regional WRF is anticipated to have sufficient capacity to accommodate wastewater from the proposed project in addition to the EVMWD's existing commitments. Impacts would be **less than significant,** and no mitigation measures would be required.

Threshold 3.19.4: Would the project 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. Solid waste generated by the proposed Project would be collected by CR&R Inc. Environmental Services and, based on proximity to the Project site, would likely be transported to El Sobrante Landfill, located approximately 8.2 miles northwest of the Project site. As shown in Table 3.19.A, El Sobrante Landfill has a maximum permitted throughput of 16,054 tons per day and a remaining permitted capacity of 47,200,000 tons.

Construction of the proposed Project would temporarily generate solid waste typical of construction sites, including construction debris and solid waste generated by construction workers. Solid waste generated by the proposed Project during construction is anticipated to be minimal and is not anticipated to exceed State or local standards or the capacity of local infrastructure or otherwise impact the attainment of solid waste reduction goals. Because the Project site is undeveloped, there would be minimal amounts of demolition debris that would need to be hauled off site from demolition of structural foundations from one former residence located within the Onsite Development Area. Consistent with CALGreen Section 5.408.1, at least 65 percent of nonhazardous matter that occupies the Project site under existing conditions would either be disposed of or may be reused on site as a recycling/reuse practice.

According to the City's General Plan EIR, industrial uses generate 6 pounds of solid waste per 1,000 square feet per day.[23] The proposed Project would include the construction of two warehouses totaling 1,000,451 square feet. As such, the proposed Project would generate approximately 6,003 pounds of solid waste per day (approximately 2.7 tons per day). This represents approximately 0.02 percent of El Sobrante Landfill's maximum permitted throughput and a negligible percentage (less than 0.00001 percent) of its remaining capacity. It should be noted that this represents a worst-case

[23] City of Lake Elsinore. 2011. *General Plan Update Draft Program EIR,* Section 3.16, Utilities and Service Systems, Table 3.16-12, Projected Increase in Solid Waste Generation – General Plan Buildout (2030). August.

scenario, and consistent with State diversion rate goals, operation of the proposed Project would include diversion of a portion of solid waste for recycling.

Therefore, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate its solid waste disposal needs. Impacts would be **less than significant**, and mitigation is not required.

Threshold 3.19.5: Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant. Solid waste practices in California are governed by multiple federal, State, and local agencies that enforce legislation and regulations, ensuring that landfill operations minimize impacts to public health and safety and the environment. The Project site is in the RCDWR's jurisdiction/service area. The RCDWR has adopted a CIWMP,[24] which was prepared in accordance with the California Integrated Waste Management Act of 1989 (AB 939). The CIWMP sets goals, policies, and objectives for the development and implementation of coordinated waste reduction programs for jurisdictions within Riverside County (including Lake Elsinore).

The RCDWR is also obligated to obtain a Solid Waste Facilities Permit, a Storm Water Discharge Permit, and permits to construct and operate gas management systems and meet Waste Discharge Requirements. The Local Enforcement Agency (LEA), the South Coast Air Quality Management District (SCAQMD), and the Santa Ana RWQCB enforce landfill regulations related to health, air quality, and water quality, respectively. The proposed Project would not inhibit the RCDWR's compliance with the requirements of each of the governing bodies.

Construction and operation of the proposed Project would comply with federal, State, and local statutes and regulations related to solid waste, including AB 75 (solid waste diversion), AB 1826 (organic waste recycling), and SB 1383 (organic waste collection services). Specifically, the proposed Project would incorporate a combination of the measures recommended by the RCDWR in its scoping letter dated August 15, 2024, as feasible, to ensure compliance with AB 75 through the diversion of solid waste generated during Project operation from landfills.

The proposed Project would comply with AB 1826 and SB 1383, which require organic waste collection/recycling practices, through the incorporation of a combination of the measures recommended by the RCDWR in its scoping letter dated August 15, 2024, as feasible, to ensure the separation of organic materials from other waste generated during Project operations and the disposal of these organic materials at a permitted organic waste processing facility.

As discussed above, the proposed Project would comply with all standards related to solid waste diversion, reduction, and recycling during Project construction and operation. Therefore, impacts would be **less than significant,** and no mitigation measures would be required.

[24] Riverside County Waste Resources Management District. 1996. Countywide Integrated Waste Management Plan. September.

3.19.7 Level of Significance Prior to Mitigation

There would be no potentially significant impacts related to utilities and service systems.

3.19.8 Compliance Measures and Mitigation Measures

No compliance measures are applicable to the proposed Project.

The proposed Project would not result in any significant adverse impacts related to utilities and service systems, and mitigation is not required.

3.19.9 Level of Significance after Mitigation

There would be no significant unavoidable adverse impacts of the proposed Project related to utilities and service systems. Mitigation is not required.

3.19.10 Cumulative Impacts

Cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable future projects within the cumulative impact area for utilities and service systems. The cumulative impact area for utilities and service systems for the proposed Project is the city of Lake Elsinore. Implementation of the proposed Project would not require the construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities beyond the improvements detailed above.

As discussed above, all Project-specific impacts related to utilities and service systems would be less than significant with compliance with existing laws, ordinances, regulations, and standards. In addition, EVMWD has determined that sufficient water and wastewater service is available to serve the proposed Project, as provided in a will-serve letter from EVMWD dated September 15, 2023 (Appendix O). As outlined in its UWMP, the EVMWD uses a mix of sources in its current and planned water supply, taking into account projected growth for the region. Based on the UWMP, which evaluates and projects regional demands, EVMWD has sufficient water supplies for all projected growth through 2045 in wet, dry, and multiple dry years, including the proposed Project and past, current, and reasonably foreseeable future projects. As the UWMP anticipates growth in population and development through 2045, and because sufficient supplies of water have been identified to serve this forecast growth, it is reasonable that cumulative development consistent with the growth anticipated in the UWMP would not lead to a cumulatively considerable impact on water supply. As with the proposed Project, cumulative development would connect to EVWMD's water supply and distribution system per the conditions and requirements (including payment of fees) established by the City. Because the proposed Project is consistent with the Limited Industrial land use designation of to the Project site, development of the proposed Project has been included in EVMWD's water supply and demand analysis. In addition, the WSA prepared for the proposed Project determined that EVMWD would have sufficient water supplies available for the proposed Project in addition to existing entitlements.[25] The implementation of project-specific conditions and payment of required fees

[25] Carollo Engineers, Inc. 2025. *Baker Street Water Supply Assessment,* pages ES-1 through ES-3. April. Appendix J-3.

would ensure adequate and appropriate conveyance infrastructure and adequate treatment capacity is maintained throughout the water system. Consequently, cumulative impacts associated with water supply or infrastructure facilities within the city would be less than significant, and mitigation is not required.

The proposed Project is anticipated to generate approximately 12,639 gallons of wastewater per day, which represents approximately 0.3 percent of the Regional WRF's current daily processing capacity and approximately 0.1 percent of its ultimate capacity. As such, the proposed Project would be adequately served by existing wastewater disposal and conveyance infrastructure, and cumulative impacts with respect to wastewater treatment capacity would be less than significant. As with the Project, cumulative development would connect to the EVMWD's wastewater conveyance and treatment system per the conditions and requirements (including payment of fees) established by the City. The implementation of project-specific conditions and payment of required fees would ensure adequate and appropriate conveyance infrastructure and adequate treatment capacity is maintained throughout the water system. Consequently, cumulative impacts associated with wastewater facilities would be considered less than significant, and mitigation is not required.

As discussed in Section 3.10, Hydrology and Water Quality, of this Draft EIR, cumulative development within the watershed will result in an increase in impervious surfaces in addition to changes in land use and associated pollutant runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology and increase potential pollutant loads. However, all future developments throughout the Santa Ana RWQCB would be required to comply with the requirements of the NPDES permit program. Continued growth is anticipated to occur in the city and surrounding areas, and all new development and significant redevelopment will be required to minimize its individual impacts to stormwater drainage and pollutant transport through implementation of Best Management Practices (BMPs).

The drainage system for the proposed Project would be designed so that peak flows from post-development runoff would be captured by landscape features and BMPs, such as infiltration basins, and then treated prior to their discharge into storm drains and water bodies pursuant to the Riverside County MS4 Permit. Similar requirements would be placed on all other development in the vicinity of the Project site by the City of Lake Elsinore. Therefore, the proposed Project would not result in a significant contribution to any cumulatively considerable impacts related to the need for new stormwater drainage facilities. Consequently, cumulative impacts associated with stormwater drainage would be less than significant, and mitigation is not required.

The proposed Project is anticipated to generate approximately 16,003 pounds of solid waste per day (approximately 2.7 tons per day). This represents approximately 0.02 percent of El Sobrante Landfill's maximum permitted throughput and a negligible percentage (less than 0.00001 percent) of its remaining capacity. As such, the proposed Project would be adequately served by existing solid waste disposal and conveyance infrastructure. AB 341 mandates the reduction of solid waste disposal in landfills. The City's waste hauler uses a variety of landfills in the area. With planned expansion activities of landfills in the Project vicinity and projected growth rates contained in the City's General Plan EIR, sufficient landfill capacity would exist to accommodate future disposal needs through at least 2051 (refer to Table 3.19.A: Riverside County Waste Management Department Landfills). Therefore, development according to the City's General Plan would not create demands for solid

waste services that would exceed the capabilities of the County's waste management system. Therefore, the proposed Project would not make a significant contribution to any cumulatively considerable impacts related to the need for new solid waste facilities. Consequently, cumulative impacts associated with solid waste would be less than significant, and mitigation is not required.

Electricity consumption during Project implementation is anticipated to be 7,117,782 kWh/year. This usage increases annual demand for electricity in the county by approximately 0.04 percent. Therefore, energy demand associated with the Project would be a very small percentage of the total energy demand from these suppliers. Additionally, the Project and all future projects would be required to incorporate Title 24 requirements and CALGreen features to further reduce energy demand. Because the Project would only represent a small fraction of energy demand in the city of Lake Elsinore and all future projects would need to meet the same requirements, there would be sufficient energy available. Therefore, the proposed Project would not make a significant contribution to any cumulatively considerable impacts related to the need for new energy facilities. As such, cumulative impacts associated with energy facilities would be less than significant, and mitigation is not required.

The proposed Project would not include any new connections to natural gas infrastructure because operation of the proposed Project would not include natural gas usage. Further, all reasonably foreseeable projects within SoCalGas' service area would be subject to CCR Title 24 requirements and would be evaluated on a case-by-case basis to determine the need for specific distribution improvements. As such, cumulative impacts associated with natural gas for the Project would be less than significant, and mitigation is not required.

Because utility interconnections, including telecommunications, would occur during preparation and earthwork phases, impacts associated with the expansion of telecommunications facilities are already considered in the overall analytical framework of this Draft EIR. As such, cumulative impacts associated with telecommunications for the Project would be less than significant, and mitigation is not required.

Each discretionary project in the city would be subject to project-specific review under CEQA, existing laws, ordinances, regulations, mitigation requirements, and design review, as applicable, including obtaining will-serve letters from the utility purveyors, consulting with EVMWD staff to establish development design conditions, and payment of fees, as applicable. As discussed above, all Project impacts to utilities and service systems would be less than significant in consideration of compliance with existing laws, ordinances, regulations, and standards. Impacts are generally localized and would occur at different times in keeping with the project phasing and would therefore avoid significant cumulative impacts from multiple overlapping developments. Therefore, there would be no significant cumulative impacts associated with utilities and service systems, and the proposed Project's contribution toward potential future utility and service system impacts would be **less than cumulatively considerable** when considered in conjunction with past, present, and future projects.

3.20 WILDFIRE

This section provides a discussion of the existing topography and vegetative cover setting related to potential wildland fire hazards and an analysis of the proposed Project's potential wildfire impacts. This section also summarizes information provided in the *Fire Protection Plan, Baker Industrial Project* (FPP)[1] prepared by Dudek in September 2025, which is included as Appendix P of this Draft Environmental Impact Report (EIR). Data from the County of Riverside (County) General Plan, County of Riverside General Plan EIR, City of Lake Elsinore (City) General Plan, City of Lake Elsinore General Plan EIR, and City of Lake Elsinore Municipal Code are also incorporated into this section.

3.20.1 Scoping Process

Potential impacts related to wildfire were not identified during the public scoping meeting held on August 1, 2024, for the proposed Project. The City received no comments in response to the Notice of Preparation (NOP) issued between July 19, 2024, and August 19, 2024, concerning the proposed Project's potential impacts related to wildfire. For copies of the NOP comment letters, refer to Appendices A-1 through A-3 of this Draft EIR.

3.20.2 Methodology

In October 2022, the State of California Office of the Attorney General released the *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*[2] (2022 Wildfire Guidance), which provides best practices for analyzing and mitigating impacts of development projects under the California Environmental Quality Act (CEQA) from risks of wildfire, including a project's impacts on wildfire ignition risk, emergency access, and evacuation.

According to the 2022 Wildfire Guidance, projects in high-wildfire-risk areas should consider the following when evaluating whether a project has the potential to impact emergency response and/or evacuation plans:

- Capacity of the roadways to accommodate project and community evacuation and simultaneous emergency access;
- Project impacts on evacuation timing;
- Need for alternative evacuation plans depending upon the location and dynamics of the emergency;
- Project impacts on existing evacuation plans;

1 Dudek. 2025. *Fire Protection Plan Baker Industrial Project*. November.
2 State of California, Office of the Attorney General. 2022. *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*. October.

- Adequacy of emergency access, including the project's proximity to existing fire services and the capacity of the existing services; and

- Project impacts on travel times under various likely scenarios.

The proposed Project's impacts on emergency response and evacuation plans during Project construction and operation are evaluated below based on the considerations above. To assess the impacts of the proposed Project with respect to wildfire, an FPP was prepared for the Project site. The FPP was prepared in accordance with applicable portions of Riverside County Fire Department (RCFD) (the fire authority with jurisdiction over the Project site) Fire Prevention Standards and Riverside County Ordinances No. 460 and No. 787.10. The proposed Project would also be consistent with the 2022 edition of the California Building Code (CBC); the 2022 edition of the California Fire Code (CFC), including Chapter 49; or another applicable code as adopted and amended by RCFD and the City of Lake Elsinore at the time of construction. The RCFD references Fire Prevention Standards for informational purposes in clarifying and interpreting provisions of the CFC, National Fire Protection Association (NFPA), and California Public Resources Code (PRC). The proposed Project would also be required to comply with Chapter 7A of the CBC, which focuses primarily on preventing ember penetration into buildings, a leading cause of structure loss from wildfires.

A field assessment of the Project site was conducted on September 22, 2023, to confirm/acquire Project site information, document existing Project site conditions, and determine potential actions for addressing the protection of the proposed Project's structures. Field tasks that were completed for analytical purposes included:

- Vegetation estimates and mapping refinements;
- Fuel load analysis;
- Topographic features documentation;
- Photograph documentation;
- Confirmation/verification of hazard assumptions;
- Off-site, adjacent property fuels and topography conditions;
- Surrounding land use confirmations;
- Necessary fire behavior modeling data collection;
- Ingress/egress documentation; and
- Nearby fire station reconnaissance.

Field observations were utilized to augment existing digital Project site data in generating the fire behavior models and formulating the recommendations presented in the FPP. The modeling software package BehavePlus (Version 6.0) was used to evaluate fire behavior variables and predict flame lengths, intensities, and spread rates objectively for five different scenarios, which include the most likely to occur and worst-case scenarios. Modeling scenario locations were identified and fuel models selected based on the Project site characteristics, topography, fuels, weather patterns, and the design and layout of the proposed Project. Fire behavior modeling runs were identified for both existing and modified (post-Project) conditions under the following five scenarios:

- **Scenario 1:** A summer, onshore fire (50th percentile weather condition) burning in low-load, grass-dominated vegetation with sparse shrubs from north/northwest of the Project site;

- **Scenario 2:** A fall, offshore fire (97th percentile weather condition) burning in low-load, grass-dominated vegetation intermixed with sparse shrubs or through a riparian area from north/northwest of the Project site;

- **Scenario 3:** A fall, offshore fire (97th percentile weather condition) burning in low-load, grass-dominated vegetation intermixed with sparse shrubs or through a riparian area from east of the Project site;

- **Scenario 4:** A fall, offshore fire (97th percentile weather condition) burning in low-load, grass-dominated vegetation intermixed with sparse shrubs from south of the Project site; and

- **Scenario 5:** A summer, onshore fire (50th percentile weather condition) burning in low-load, grass-dominated vegetation with sparse shrubs from west of the Project site.

3.20.3 Existing Environmental Setting

As stated in Section 2.0, Project Description, of this Draft EIR, the 140.04-acre Project site comprises four elements: a 65.81-acre Onsite Development Area within which the proposed warehouse buildings and associated parking would be developed; 37.86 acres of Offsite Improvement Area that would consist of right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs; a 33.65-acre Restoration Area to be used for future conservation and restoration activities, and a 2.72-acre Construction/Improvements Buffer to be established between Baker Street and the proposed Restoration Area to ensure that ROW improvements would not encroach into the Restoration Area.

The following section discusses the characteristics, local climate, and fire history within and surrounding the Project site. It should be noted that the following discussion, which is largely derived from information contained in the FPP, is primarily focused on the Onsite Development Area portion of the Project site since inhabitable structures are planned for this area. At times, the following sections discuss the characteristics of the Project site on a regional scale. The intent of evaluating conditions at a regional scale is to provide a better understanding of the regional fire and the related potential wildfire hazards at the Project site and surrounding areas in the near vicinity of the Project site.

3.20.3.1 Fire Environment

Fire environments are dynamic systems and include many types of environmental factors and characteristics. Fires can occur in any environment where conditions are conducive to ignition and fire movement. Areas of naturally vegetated open space typically comprise conditions that may be favorable to wildfire spread. The three major components of fire environment are topography, climate, and vegetation (fuels). The state of each of these components and their interactions with each other determines the potential characteristics and behavior of a fire at any given moment.

It is important to note that wildland fire may transition to urban fire if structures are receptive to ignition. Structure ignition depends on a variety of factors and can be prevented through a layered system of protective features, including fire-resistive landscapes adjacent to structure(s), application of known ignition-resistive materials and methods, and suitable infrastructure for firefighting purposes. Understanding the existing wildland vegetation and urban fuel conditions on and adjacent to the Project site is necessary to understand the potential for fire within and around the Project site.

As discussed in Section 2.0, Project Description, of this Draft EIR, the Project site is located at the foot of several hills. As such, the Project site is located in a wildland-urban interface (WUI) setting. The WUI is a zone of transition between unoccupied land and human development. It is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland and vegetative fuels.[3] Further, the Project site is located within an area statutorily designated as a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA). LRAs are incorporated cities, urban regions, agriculture lands, and portions of the desert where the local government is responsible for wildfire protection.[4] Alternatively, State Responsibility Areas (SRA) areas where the California Department of Forestry and Fire Protection (CAL FIRE) is the primary emergency response agency responsible for fire suppression and prevention.[5] Lastly, in a Federal Responsibility Area (FRA), the responsibility of preventing and suppressing wildfires is primarily the responsibility of a federal agency.[6] Figure 3.20-1, CAL FIRE Hazard Severity Zones, shows that the Project site is located in a VHFHSZ pursuant to CAL FIRE mapping, which underwent a comprehensive update in March 2025.

3.20.3.2 Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread upslope and slower fire spread downslope in the absence of wind. Flat terrain tends to have little effect on fire spread, resulting in fires that are driven by wind.

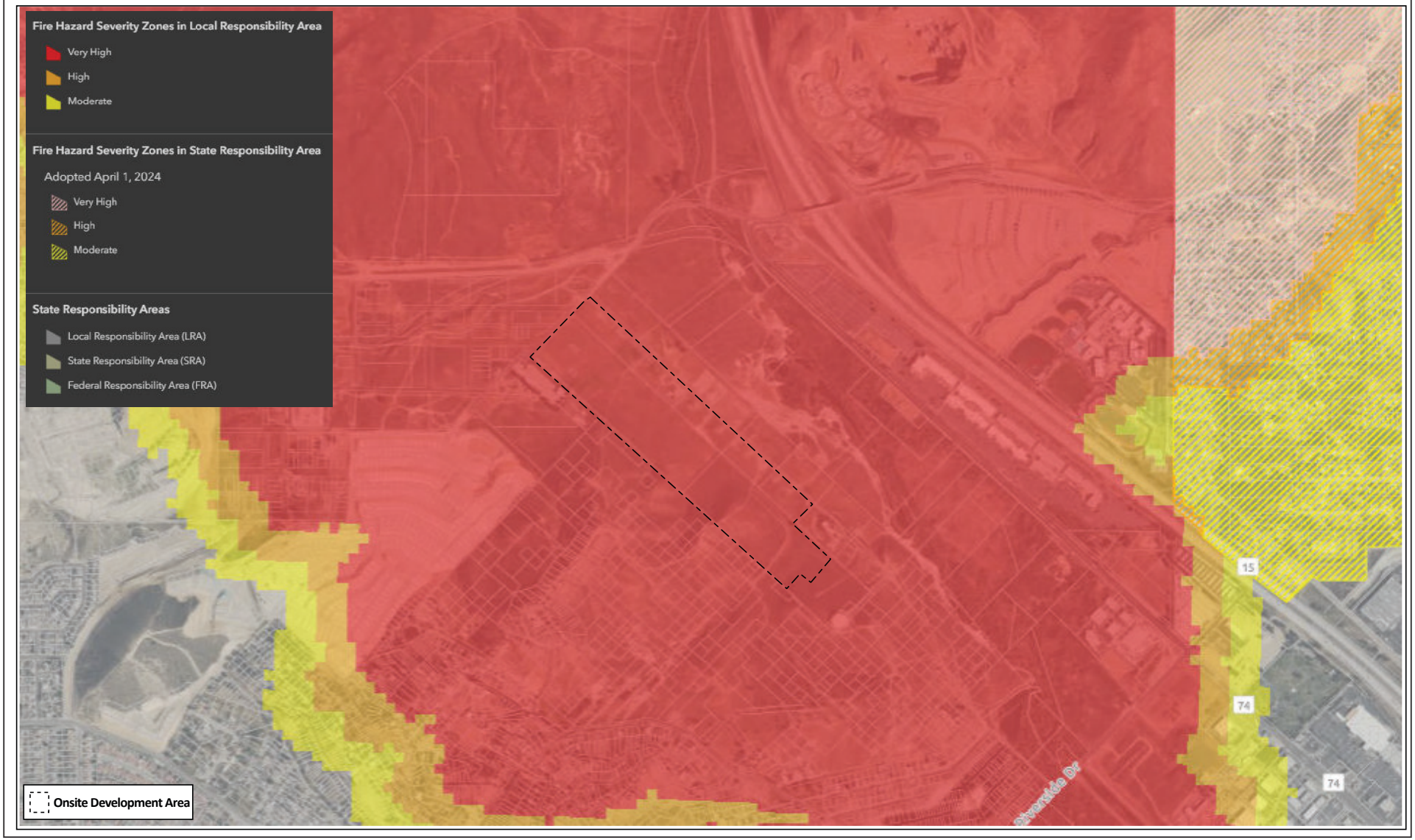
The Project site is characterized by topography ranging from slightly hilly to flat and generally slopes from southwest to northeast. As discussed in Section 3.7, Geology and Soils, of this Draft EIR, the Onsite Development Area includes slopes of up to 25 degrees, with elevations ranging between approximately 1,260 feet and 1,400 feet above mean sea level. The Onsite Development Area consists of several small hills and ridges sloping from the southwest down to the existing dirt road of Baker

[3] United States Fire Administration: What is the WUI? Website: https://www.usfa.fema.gov/wui/what-is-the-wui/.

[4] California Department of Forestry and Fire Protection. 2019. Frequently Asked Questions About: 2020 Fire Hazard Severity Zones. November. Website: https://bof.fire.ca.gov/media/ttpi3n3m/full-14-b-vhfhsz-frequently-asked-questions.pdf (accessed June 24, 2025).

[5] California Board of Forestry and Fire Protection. State Responsibility Area Five-Year Review. Website: https://calfire-umb05.azurewebsites.net/ (accessed June 24, 2025).

[6] California Department of Forestry and Fire Protection. 2025. Fire Hazard Severity Zones. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed June 24, 2025).



LSA

FIGURE 3.20-1

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SOURCE: Dudek

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Baker Street Warehouse Project
CAL FIRE Hazard Severity Zones

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Street and becoming flatter on the northern end near the Baker Street/Pierce Street intersection. On the opposite side of Baker Street, the landscape is flat, with a very gradual change in elevation to the northeast.

3.20.3.3 Climate

Throughout Southern California, including at the Project site, climate has a large influence on fire risk. The climate of the city of Lake Elsinore is typical of a Mediterranean area, with warm, dry summers and mild, wet winters. Annual temperatures in the Project site vicinity range from approximately 65 degrees Fahrenheit (°F) in the winter months up to 87 °F in the summer months. Precipitation averages approximately 11 inches and typically occurs between November and March. The prevailing wind is an onshore flow between 5 and 7 miles per hour (mph) from the west.

Fire risk in Southern California is generally divided into three distinct "seasons." The summer season, which is associated with the highest fire risk, extends from late May to late September. This is followed by the fall season, from late September to early November, during which fewer fires occur but those that do occur are typically larger. The winter season, between November to late May, is characterized by minimal fire risk.

Fires can be an issue during the summer and fall, before the rainy period and, especially during dry Santa Ana wind events. The seasonal Santa Ana winds can be particularly strong in the Project area, as warm and dry air is channeled through the San Gorgonio Pass from the dry, desert land to the east of the Project site. Although Santa Ana events can occur during any time of the year, they generally occur during the autumn months, although the last few years have resulted in spring (April–May) and summer (May to late September) events as well. Santa Ana winds in the region may gust up to 75 mph or higher. This phenomenon markedly increases the wildfire danger and intensity in the Project area by drying out and preheating vegetation (fuel moisture of less than 5 percent for 1-hour fuels is possible), as well as accelerating oxygen supply and thereby creating conditions conducive to the burning of fuels that otherwise might not burn under cooler, moister conditions.

3.20.3.4 Fuels (Vegetation)

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading.

The Project site, including the Onsite Development Area, largely consists of low-growing ruderal/grazed lands and nonnative grassland vegetation. Most of the area adjacent to the Project site is vegetated with nonnative grasslands interspersed with scrub. The proposed Project would remove and change vegetation cover within the Onsite Development Area that would reduce fire impacts by reducing grasslands and scrub.

3.20.3.5 Fire History

Fire history is an important component in analyzing wildfire susceptibility. Fire history data provides valuable information regarding fire spread, fire frequency, most vulnerable areas, and significant

ignition sources, among other information. This understanding of why fires occur in an area and how they typically spread can then be used for pre-planning and designing defensible communities.

Fire history for the Project site and surrounding area was determined by referencing the CAL FIRE Fire and Resources Assessment Program (FRAP) database.[7] The FRAP summarizes fire perimeter data that date to the early 1900s, but is not comprehensive due to the fact that it only includes fires over 10 acres and has incomplete perimeter data, especially for the first half of the 20th century. However, the data serve as a useful reference as they provide a summary of recorded fires, can be used to show whether large fires have occurred in the Project site vicinity, and indicate whether large fires in the Project site vicinity may be possible in the future.

In its FRAP database, CAL FIRE has recorded 88 fires since 1900 that have burned within 5 miles of the Project site, including one fire on record that has burned on the Project site itself. This unnamed fire occurred in 1968 and burned approximately 233 acres. The sizes of other recorded wildfires within 5 miles range from approximately 10 acres up to approximately 31,447 acres (1980 Turner Fire), and the average fire size is approximately 2,672 acres. According to the FPP, the 2019 Toro Fire (approximately 88 acres) is the most recent fire, while the most recent significant[8] fire cited in the FPP is the 2018 Holy Fire (approximately 23,025 acres). In addition to the fires listed in the FPP, it should be noted that the 2024 Airport Fire spread within approximately 4 miles of the Project site, and the 2025 Crump Fire spread within approximately 2.8 miles of the project site. The Airport Fire was active for 26 days between September and October of 2024 and spanned approximately 23,526 acres.[9] The Airport Fire resulted in damage to 34 structures, destruction of 160 structures, and injuries to 2 civilians and 20 firefighters. As such, the Airport Fire is the most recent significant wildfire within 5 miles of the Project. Additionally, the Crump Fire was active for 1 day (September 7, 2025) and spanned approximately 55 acres. As of September 8, 2025, no damage or injuries have been reported. As the Crump Fire area consists of grassland and has not reported any major damage or injuries, it would not be considered a significant wildfire.[10]

Based on an analysis of the FRAP fire history data set, specifically the years in which the fires burned, the average interval between wildfires within approximately 5 miles of the Project site was calculated to be every 1 to 2 years; with intervals ranging between 0 and 15 years. As a result, wildfire could impact the Project site. Figure 3.20-2, Project Site Vicinity Fire History Map, shows the fire history within 5 miles of the Project site since 1900.

7 Dudek. 2025. *Fire Protection Plan Baker Industrial Project.* November.

8 As of 2008, the FRAP database considers a fire to be "significant" if it meets one of the following criteria: burns ≥10 acres in timber, burns ≥50 acres in brush, burns ≥300 acres in grass, damages or destroys three or more structures, causes $300,000 worth of damage, or results in loss of life.

9 California Department of Forestry and Fire Protection. Airport Fire. Website: https://www.fire.ca.gov/incidents/2024/9/9/airport-fire (accessed May 19, 2025).

10 California Department of Forestry and Fire Protection. Crump Fire. Website: https://www.fire.ca.gov/incidents/2025/9/6/crump-fire (accessed September 8, 2025).

LSA

Onsite Development Area

Measurement Locations

N

0 375 750

FEET

FIGURE 3.13-2

Baker Street Warehouse Project

Noise Measurement Locations

SOURCE: Urban Crossroads

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3.20.4 Regulatory Setting

The following describes federal, State, regional, and local (e.g., City) regulations applicable to the proposed Project related to wildfire.

3.20.4.1 Federal Regulations

The following federal regulation would be applicable to the proposed Project.

National Incident Management System. The National Incident Management System (NIMS), administered by the Federal Emergency Management Agency, provides a systematic, proactive approach to guide government agencies, nongovernmental organizations, and the private sector to work together to prevent, report, recover from, and mitigate the effects of fire incidents, regardless of cause, size, location, or complexity, to reduce the loss of life and property as well as harm to the environment. The City participates in NIMS, which improves its ability to prepare for and respond to potential incidents and hazard scenarios.

3.20.4.2 State Regulations

The following State regulations would be applicable to the proposed Project.

CAL FIRE and Resources Assessment Program. CAL FIRE publishes maps that predict the threat of fire for each county within the State. LRAs, SRAs, and FRAs are classified as either VHFHSZ or non-VHFHSZ based on factors such as fuel availability, topography, fire history, and climate. As previously stated, the Project site is located within an LRA and not within an SRA. The 2024 Strategic Fire Plan for California was prepared by CAL FIRE to provide guidelines and objectives to account for associated fire impacts.[11] In addition, CAL FIRE has adopted a "Ready, Set, Go!" stance on evacuation:[12]

- **"READY" – Preparing for the Fire Threat:** Take personal responsibility and prepare long before the threat of a wildfire so you and your home are ready when a wildfire occurs. Employees should assemble an emergency kit for their car. Confirm you are registered for Reverse 911, Nixle and Alert RivCo. Make sure all employees understand the plan, procedures, and escape routes.

- **"SET" – Situational Awareness When a Fire Starts:** If a wildfire occurs and there is potential for it to threaten your property and surrounding communities, be ready to evacuate. Stay aware of the latest news from local media and your local fire department for updated information on the fire. If you are uncomfortable, leave the area.

- **"GO!" – Leave Early!** Leaving early, well before a wildfire is threatening your property, provides you with the least delay and results in a situation where, if a majority of neighboring developments also leave early, firefighters are now able to better maneuver, protect and defend structures, evacuate other occupants who couldn't leave early, and focus on citizen safety.

[11] California Board of Forestry and Fire Protection and California Department of Forestry and Fire Protection. 2018. *2024 Strategic Fire Plan for California.* August 22.

[12] California Department of Forestry and Fire Protection. Ready, Set, Go! Website: https://readyforwildfire.org/prepare-for-wildfire/ (accessed May 19, 2025).

California Fire Code. Chapter 15.56 of the Lake Elsinore Municipal Code and Ordinance Nos. 460 and 787.10 and Title 8, Chapter 8.32, of the Riverside County Municipal Code adopt the CFC, which is updated every 3 years. The CFC includes regulations for emergency planning, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations, distribution, and spacing. Several fire safety requirements include the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

California State Hazard Mitigation Plan. The purpose of the State Hazard Mitigation Plan (SHMP) is to significantly reduce deaths, injuries, and other losses attributed to natural and human-caused hazards in California. The SHMP provides guidance for hazard mitigation activities, emphasizing partnerships among local, State, and federal agencies as well as the private sector.

California Government Code. California Government Code §51178 defines VHFHSZs and designates lands considered by the State to be a very high fire hazard. California Government Code §51189 directs the Office of the State Fire Marshal to create building standards for wildland fire resistance. The California Government Code includes measures that increase the likelihood of a structure withstanding intrusion by fire (e.g., building design and construction requirements that use fire-resistant building materials) and provides measures for protection of structure projections (e.g., porches, decks, balconies, and eaves) and structure openings (e.g., attics, eave vents, and windows).

California Public Resources Code. PRC §4290 sets forth regulations implementing minimum fire standards within SRAs. PRC §4291 sets forth defensible space requirements, which are applicable to anyone that "… owns, leases, controls, operates, or maintains a building or structure in the state responsibility area" (§4291(a)).

California Code of Regulations Title 8: Industrial Relations. In accordance with CCR Title 8 Group 27 (Fire Protection) and §6773 (Fire Protection and Fire Fighting Equipment), the California Occupational Safety and Health Administration (Cal/OSHA) establishes fire suppression service standards. The standards range from fire hose size requirements to the design of emergency access roads.

California Code of Regulations Title 14: Natural Resources. CCR Title 14, Division 1.5 (Department of Forestry and Fire Protection), establishes the regulatory framework for CAL FIRE and details a variety of wildfire preparedness, prevention, and response regulations.

California Code of Regulations Title 19: Public Safety. Title 19 of the CCR establishes a variety of emergency fire response, fire prevention, and construction/construction materials standards.

California Code of Regulations Title 24: California Building Standards Code. The CFC is set forth in Part 9 of the Building Standards Code. The CFC includes provisions established in the International Fire Code, as prepared by the International Code Council (ICC), and contains fire safety building standards, which are also referenced in other parts of Title 24.

California Health and Safety Code §13000 et seq. and California Building Code. State fire regulations are set forth in §13000 et seq. of the California Health and Safety Code, which is divided into "Fires

and Fire Protection" and "Buildings Used by the Public." The California Health and Safety Code establishes broadly applicable regulations, such as standards for buildings and fire protection devices, in addition to regulations for specific land uses, such as childcare facilities and high-rise structures. The regulations provide for the enforcement of the CBC and mandate the abatement of fire hazards.

California Health and Safety Code Division 11: Explosives. Division 11, Section 12000 et seq., of the California Health and Safety Code establishes regulations related to a variety of explosive substances and devices, including high explosives and fireworks. Section 12000 et seq. establishes regulations related to explosives and explosive devices, including permitting, handling, storage, and transport (in quantities greater than 1,000 pounds).

California Building Code, Chapter 7A. Chapter 7A applies to building materials, systems, and/or assemblies used in the exterior design and construction of new buildings located within a WUI Fire Area.[13] This section of the CBC establishes minimum standards for features such as fire retardant-treated wood and wood shingles, surface treatment protection, ignition-resistant construction, roof coverings and gutters, vents, exterior walls and coverings, exterior porch ceilings, underfloor protection, exterior windows, skylights, doors, decking, and accessory structures.

Executive Order N-05-19. On January 9, 2019, Governor Newsom also signed Executive Order (EO) N-05-19, which requires CAL FIRE and other State agencies to compile policy and regulatory recommendations concerning wildfire mitigation, emphasizing environmental sustainability and public health.

3.20.4.3 Regional Regulations

The following regional regulations would be applicable to the proposed Project.

County of Riverside Emergency Management Department Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan. The Multi-Jurisdictional Local Hazard Mitigation Plan (MJLHMP) aims to reduce the impact of a disaster by identifying potential hazards and developing ways to decrease their impact. The MJLHMP's risk assessment process, as discussed in Section 5.0 of the MJLHMP, identifies hazards with the greatest potential impact on the community. According to Table 21, Vulnerability Worksheet, of the MJLHMP, fire represents the number-one risk facing Riverside County and the city of Lake Elsinore. In addition, the MJLHMP encourages development of long-term prevention or protection steps to lessen the impact of each hazard. The MJLHMP spreads awareness of hazards, threats, and vulnerabilities within the community and paves a path forward for jurisdictions to prepare for local and regional disasters. The MJLHMP was updated in 2025, and the County of Riverside is compliant with the Disaster Mitigation Act of 2000.[14]

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13 The FPP defines a Wildland-Urban Interface Fire Area as a "geographical area identified by the state as a 'Fire Hazard Severity Zone' in accordance with the Public Resources Code Sections 4201 through 4204 and Government Code Sections 51175 through 51189, or other areas designated by the enforcing agency to be at a significant risk from wildfires."

14 Riverside County Emergency Management Department. 2023. County of Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan. April. Updated 2025.

Section 8.0 of the MJLHMP sets forth goals and objectives related to local hazard planning and preparation, including the following that would be applicable to the proposed Project:

- **Objective 1.1:** Provide timely notification and direction to the public in preparation for imminent and potential hazards.
- **Objective 1.3:** Reduce hazard impacts and protect life, property and the environment from damages.
- **Objective 2.3:** Reduce repetitive losses for fire, flood, and earthquakes by encouraging protective measures and by anticipating future events.

3.20.4.4 Local Regulations

The following local regulations would be applicable to the proposed Project.

City of Lake Elsinore Emergency Preparedness Plan. The City of Lake Elsinore is responsible for developing emergency plans and actions in response to actual or potential disasters which may impact the city. The City designs and conducts exercises for different scenarios and coordinates emergency training to ensure that it is able to respond to natural, human-caused, and technological emergencies. The Emergency Preparedness Plan outlines response strategies and tactics for a wide range of emergencies, including earthquakes, wildfires, flooding, terrorism, civil unrest, nuclear plants, severe weather, extreme heat, droughts, utility outages, transportation accidents, and hazardous materials releases. The City fulfills a wide variety of roles, from field response to emergency incidents to operating the City Emergency Operation Center in supporting and recovering from major emergencies and disasters.[15]

City of Lake Elsinore Local Hazard Mitigation Plan. The City's Local Hazard Mitigation Plan (LHMP) identifies the City's hazards, reviews and assesses past disaster occurrences, estimates the probability of future occurrences, and sets goals to mitigate potential risks to reduce or eliminate long-term risks to people and property from natural and man-made hazards, including wildfires. The plan was prepared pursuant to the requirements of the federal Disaster Mitigation Act of 2000 to achieve eligibility and potentially secure mitigation funding through the Federal Emergency Management Agency (FEMA) Flood Mitigation Assistance Grant Program, Pre-Disaster Mitigation Grant Program, and Hazard Mitigation Grant Program.[16]

City of Lake Elsinore General Plan, Chapter 3.0, Public Safety and Welfare. Chapter 3.0 of the City of Lake Elsinore General Plan addresses public safety and welfare issues, including wildfire. Chapter 3.0 focuses on maintaining a healthy and safe physical environment and ensuring community welfare through access to effective and efficient high-quality public services. The following goals and policies related to wildfire are applicable to the proposed Project:

[15] City of Lake Elsinore. Emergency Preparedness. Website: https://www.lake-elsinore.org/208/Emergency-Preparedness (accessed May 19, 2025).

[16] City of Lake Elsinore. 2017. Local Hazard Mitigation Plan. June.

- **Goal 4:** Adhere to an integrated approach to minimizing the threat of wildland fires to protect life and property using pre-fire management, suppression, and post-fire management.
    - **Policy 4.1:** Require on-going brush clearance and establish low fuel landscaping policies to reduce combustible vegetation along the urban/wildland interface boundary.
    - **Policy 4.2:** Create fuel modification zones around development within high hazard areas by thinning or clearing combustible vegetation within 100 feet of buildings and structures. The fuel modification zone size may be altered with the addition of fuel resistant building techniques. The fuel modification zone may be replanted with fire-resistant material for aesthetics and erosion control.
    - **Policy 4.3:** Establish fire resistant building techniques for new development such as non-combustible wall surfacing materials, fire-retardant treated wood, heavy timber construction, glazing, enclosed materials and features, insulation without paper-facing, and automatic fire sprinklers.
    - **Policy 4.4:** Encourage programs that educate citizens about the threat of human wildfire origination from residential practices such as outdoor barbeques and from highway use such as cigarette littering.

3.20.5 Thresholds of Significance

The thresholds for wildfire impacts used in this analysis are consistent with Appendix G of the *State CEQA Guidelines*. The proposed Project may be deemed to have a significant impact with respect to wildfire if it would:

Threshold 3.20.1: Substantially impair an adopted emergency response plan or emergency evacuation plan,

Threshold 3.20.2: 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,

Threshold 3.20.3: Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, or

Threshold 3.20.4: 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.

3.20.6 Project Impacts

Potential impacts of the proposed Project related to wildfire are discussed below pursuant to the thresholds provided above. As previously described, the Project site is in a WUI setting and within an area statutorily designated as a VHFHSZ within an LRA.

Threshold 3.20.1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant. As discussed in Section 3.15, Public Services, of this Draft EIR, police protection services to the Project site would be provided by the Lake Elsinore Police Department (LEPD) through a contract with the Riverside County Sheriff's Department (RCSD). Fire protection services would be provided by the RCFD and CAL FIRE.

As previously stated, according to the 2022 Wildfire Guidance, projects in high-wildfire-risk areas should consider the following when evaluating whether a project has the potential to impact emergency response and/or evacuation plans:

- Capacity of the roadways to accommodate project and community evacuation and simultaneous emergency access;
- Project impacts on evacuation timing;
- Need for alternative evacuation plans;
- Project impacts on existing evacuation plans;
- Adequacy of emergency access, including the project's proximity to existing fire services and the capacity of the existing services; and
- Project impacts on travel times under various likely scenarios.

The proposed Project's impacts on emergency response and/or evacuation plans during Project construction and operation are evaluated below based on the considerations above.

Construction. The following analysis addresses potential impacts to emergency response and/or evacuation plans relating to wildfire during Project construction.

Capacity of the Roadways to Accommodate Project and Community Evacuation and Simultaneous Emergency Access. Primary vehicular access to the Onsite Development Area would be provided via Pierce Street and Baker Street via Nichols Road. All three roadways could accommodate egress from the Onsite Development Area in the event of an emergency. During a large wildfire moving from north to south or east to west, it is most likely that evacuations would ultimately be directed to Interstate (I-)15 to exit the region, depending on the fire location and movement. Construction of the proposed Project would include improvements to select segments of Nichols Road, Pierce Street, and Baker Street. These improvements include paving Baker Street along the frontage of the Onsite Development Area and connecting Baker Street to Nichols Road,

as well as paving Pierce Street from Nichols Road toward the southwest to connect to Hoff Avenue. Construction of these improvements may require partial lane closures and temporarily reduce roadway capacity, increase congestion, and impact traffic flows and/or emergency access in the event of a community evacuation. However, internal access roads would be provided throughout the Project site during construction activities that would provide emergency response vehicle access to the Onsite Development Area and allow traffic to evacuate the Project site.

The City requires prior notification of any lane or road closures with sufficient signage before and during any closures, as well as flag crews with radio communication when necessary to coordinate traffic flow. Pursuant to **Regulatory Compliance Measure (RCM) TRA-1** (provided in Section 3.17, Transportation, of this Draft EIR), the City would require the construction contractor to implement a Transportation Management Plan (TMP) to manage temporary lane closures along Nichols Road, Pierce Street, and Baker Street so as not to substantially impair these roadways' capacities to accommodate Project and community evacuation and simultaneous emergency access. The proposed Project would comply with the TMP, which shall be prepared consistent with the recommendations of the *California Temporary Traffic Control Handbook*.[17] Under the TMP, the construction contractors would maintain emergency access and allow for evacuation, if needed, during construction activities. With implementation of existing regulations that would be implemented through **RCM TRA-1**, construction of the proposed Project would not substantially impair the capacity of adjacent roadways to accommodate Project and community evacuation and simultaneous emergency access. Impacts would be **less than significant**.

Project Impacts on Evacuation Timing. As stated above, under an evacuation scenario during Project construction, egress from the Onsite Development Area could occur via Pierce Street and Nichols Road via Baker Street, and evacuation traffic would likely be routed to I-15 to exit the region, depending on the fire's location and movement. As discussed above, Project construction may require partial lane closures along Pierce Street, Baker Street, and Nichols Street, which could slow traffic flow and therefore increase evacuation timing should a fire emergency occur at the time of lane closure. However, as discussed above, the City would require the construction contractor to prepare and implement a TMP (**RCM TRA-1**) to maintain traffic flow along these streets during both normal and emergency traffic operations. Therefore, with the implementation of **RCM TRA-1**, construction of the proposed Project would not substantially increase evacuation timing.

Need for Alternative Evacuation Plans. During an emergency, construction workers could utilize Pierce Street and Baker Street via Nichols Road, which would ultimately provide access to I-15. However, evacuation routes used during emergencies are dependent on the location and extent of the emergency. With the implementation of **RCM TRA-1**, a TMP would be prepared, including provisions to maintain traffic flow and emergency access along these potential evacuation routes, including egress under an evacuation scenario. Therefore, with the implementation of **RCM TRA-1**, construction of the proposed Project would not result in the need for alternative evacuation plans, and impacts would be **less than significant**.

[17] California Inter-Utility Coordinating Committee. 2018. *California Temporary Traffic Control Handbook, 7th Edition.* May.

Project Impacts on Existing Evacuation Plans. The overarching evacuation plan utilized by CAL FIRE, the RCFD, and the City of Lake Elsinore is the "Ready, Set, Go!" strategy. This strategy consists of advance preparation, situational awareness, and early evacuation procedures. Adherence to this strategy during construction of the Proposed Project, as ensured through the City's construction review and permitting process, would ensure that no substantial impacts to existing evacuation plans in the city would occur during Project construction.

As stated above, emergency egress from the Onsite Development Area could occur via Pierce Street and Nichols Road via Baker Street. Construction of the proposed Project may require temporary lane closures on Piece Street, Baker Street, and Nichols Road, which could impact these potential evacuation routes by slowing traffic flow. However, as described in detail above, implementation of **RCM TRA-1** would ensure that construction of the proposed Project would not substantially impair the streets' capacity to accommodate Project and evacuation traffic or substantially increase evacuation timing.

Adequacy of Emergency Access, Including the Project's Proximity to Existing Fire Services and the Capacity of the Existing Services. Construction of the proposed roadway improvements to Nichols Road, Pierce Street, and Baker Street may require partial lane closures, which could temporarily impair emergency access to the Project site or within the Project site vicinity. However, as discussed above, the construction contractor would be required through the City's construction permitting process to prepare and implement a **TMP (RCM TRA-1)** to be reviewed and approved by City staff. The TMP would be consistent with the recommendations of the *California Temporary Traffic Control Handbook* and would include provisions to maintain traffic flow along Nichols Road, Pierce Street, and Baker Street; safe access into and out of the Project site; and emergency access to the Project site and adjacent areas during construction.

As discussed in Section 3.15, Public Services, the City contracts with the RCFD and CAL FIRE for fire protection services. The RCFD operates 106 fire stations in 15 battalions, providing fire suppression, emergency medical, rescue, and fire prevention services.[18] The City is served by Battalion 2 in the Southwest Division of the RCFD, which is served by eight fire stations. Of the eight fire stations serving Lake Elsinore under Battalion 2, four are located within city limits:

- Elsinore Station No. 10 (410 West Graham Avenue);
- McVicker Park Station No. 85 (29405 Grand Avenue);
- Canyon Hills Station No. 94 (22770 Railroad Canyon Road); and
- Rosetta Canyon Station No. 97 (41725 Rosetta Canyon Drive).

The nearest fire station to the Project site is the Rosetta Canyon Station No. 97, located a travel distance of approximately 3.3 miles northeast of the Project site. Station 97 is staffed 24/7 by a four-person truck company with a captain, an engineer, and two firefighter-paramedics, and is equipped with a Battalion vehicle (Battalion Chief 2), one quint aerial ladder truck, and a squad vehicle. This fire station would likely provide the initial response to the Project site due to its proximity and its possession of an aerial firefighting apparatus. McVicker Park Station No. 85 is

[18] Riverside County Fire Department. Riverside County Fire Stations. Website: https://www.rvcfire.org/resources/fire-stations (accessed June 25, 2025).

the next nearest station, located a travel distance of approximately 3.3 miles southwest of the Project site.

RCFD's Service Alternatives Report from 2022/2023 provides recommended response time standards based on four Land Use Classifications. The Project site is designated as "Suburban," which has a 6-minute first-in response time goal.[19]

According to calculations presented in the FPP, if a wildfire were to occur during Project construction, Rosetta Canyon Station No. 97 and McVicker Park Station No. 85 could respond to the nearest Onsite Development Area entrance within approximately 8.51 minutes under the Speed Limit Formula and 9.11 minutes under the Insurance Services Office (ISO) formula.[20] As such, RCFD's response times to an emergency at the Project site or in the Project vicinity, as modeled using the Speed Limit Method, would not fully conform to applicable RCFD response time standards, as they would exceed the 6-minute first-in response time goal, which includes travel time, dispatch time, and turnout time.

To satisfy the Fire Facilities Fee requirement set forth in Section 16.74.049 of the City of Lake Elsinore Municipal Code, and as implemented by **RCM PS-2** in Section 3.15, Public Services, of this Draft EIR, the Project Applicant would pay development impact fees related to fire facilities, fulfilling its requirement to fund its share of improvements and mitigate its potential impact. In addition, the Project Applicant would enter into a development agreement with the City and RCFD/CAL FIRE under which the Project would provide additional funding to the City for a future fire station or other infrastructure in closer proximity to the Project site, thereby supporting local fire facility improvement efforts beyond what is required and ensuring a satisfactory response time.

Additionally, during emergency evacuation conditions, as under normal circumstances, vehicles would be required to yield to emergency vehicles in accordance with California Vehicle Code 21806(A)(1). In the event that Nichols Road, Pierce Street, or Baker Street are used as evacuation routes during an emergency while construction activities are ongoing, implementation of **RCM TRA-1** would ensure that the RCFD's response time to the Onsite Development Area or overall Project site would not be significantly increased.

Accordingly, with adherence to **RCM PS-2** and **RCM TRA-1,** the RCFD would have adequate capacity to serve the Project site if there were an emergency during construction activities. Therefore, construction of the proposed Project would not result in inadequate emergency access or impact the capacity of emergency responders to provide emergency services to the Project site. Impacts would be **less than significant**.

19 Dudek. 2025. *Fire Protection Plan Baker Industrial Project*. Pages 10, 46, and 73. November.

20 The Insurance Services Office (ISO) response travel time formula discounts speed for intersections, vehicle deceleration, and acceleration, and does not include turnout time. Because applicable response travel time standards discussed in this analysis include travel time, dispatch time, and turnout time, the ISO response travel time speeds are presented in the Fire Protection Plan (Dudek 2025) for comparative purposes only.

Project Impacts on Travel Times under Various Likely Scenarios. As previously discussed, the FPP modeled five different wildfire scenarios, which include the most likely to occur and worst-case scenarios, using the modeling software package BehavePlus (Version 6.0). This modeling provided information regarding flame lengths, intensities, and spread rates based on characteristics associated with each wildfire scenario. Two scenarios analyzed a wildfire approaching the Project site from the north/northwest, while the other three scenarios analyzed wildfires approaching from the east, south, and west. As such, fires from all directions were considered as possibilities. It should be noted that the FPP did not model specific emergency response or evacuation travel times under each of the five wildfire scenarios. It is reasonable to assume that evacuation travel times from the Project site would vary based on the direction of the wildfire's origin. For example, access to I-15, which is located to the northeast of the Onsite Development Area, may be inhibited by a wildfire spreading from the northeast. However, pursuant to RCM TRA-1, the TMP would include provisions for alternative routes, such as State Route 74 and arterial roadways, to maintain traffic flow, safe access into and out of the Project site, and emergency access to the Project site and adjacent areas during construction.

The FPP does provide an analysis of emergency response timing under a general construction or operation scenario, which determined that RCFD's response times to the Project site or in the Project vicinity would exceed the 6-minute first-in response time goal, which includes travel time, dispatch time, and turnout time. However, consistent with existing requirements, the Project applicant would pay development impact fees related to fire facilities and would enter into a development agreement with the City and RCFD/CAL FIRE under which the Project would provide additional funding to the City for a future fire station or other fire service infrastructure in closer proximity to the Project site than the existing station. This would support local fire facility improvement efforts beyond what is required to provide for satisfactory travel times for emergency response. As such, construction of the Project would not result in a significant impact on travel times under various likely scenarios.

Operation. The following analysis addresses potential impacts to emergency response and/or evacuation plans from wildfire during Project operation.

Capacity of the Roadways to Accommodate Project and Community Evacuation and Simultaneous Emergency Access. Primary vehicular access to the Onsite Development Area would be provided via Pierce Street and Baker Street via Nichols Road. All three roadways could accommodate egress from the Onsite Development Area in the event of an emergency. During a large wildfire moving from north to south or east to west, it is most likely that evacuations would ultimately be directed to I-15 to exit the region, depending on the fire location and movement. The proposed Project would include improvements to select segments of Nichols Road, Pierce Street, and Baker Street. These improvements include paving Baker Street along the frontage of the Onsite Development Area and connecting Baker Street to Nichols Road, as well as paving Pierce Street from Nichols Road toward the southwest to connect to Hoff Avenue, to improve traffic circulation in the Project vicinity and create a second means of emergency access. These improvements would achieve the full buildout of Baker Street and Pierce Street, consistent with the City's General Plan roadway classifications that would provide for 53,900 average daily trips (ADT) and 13,000 ADT, respectively. As such, the Project would provide for the ability of nearby

roadways to accommodate a potential evacuation event. All roadways within the Project site would be developed in accordance with applicable City and RCFD ordinances and codes related to emergency access standards, including those in the RCFD Fire Code and the 2022 CFC. Compliance with applicable ordinances and codes would ensure adequate access to, from, and within the Project site for emergency vehicles during operation of the proposed Project.

As evidenced by recent mass evacuations in Southern California, even when roadways are designed to meet fire code requirements, it may not be possible to move large numbers of persons at the same time as road infrastructure is not designed to accommodate a short-notice, mass evacuation. As such, evacuations from the Project site vicinity would be prioritized based on vulnerability and, therefore, would move smaller populations in successive phasing in order to minimize traffic surges. Populated areas would be evacuated in phases based on proximity to the emergency and risk levels. The purpose of a phased evacuation is to reduce congestion and transportation demand on designated evacuation routes by controlling access to evacuation routes in stages and sections and to prioritize the evacuation of specific populations that are in proximity to immediate danger. Under a phased evacuation approach, the evacuation time would decrease, and evacuation of the Project site would result in minimal impacts on the surrounding communities. It is anticipated that evacuations of the Project site vicinity would likely include the evacuation of land uses that are closest to the location of the emergency, along with employees and visitors of the Onsite Development Area first, and then additional populations based on exposure to the emergency in successive fashion rather than mass-evacuating the entire Lake Elsinore area. As previously stated, the proposed improvements to Nichols Road, Pierce Street, and Baker Street would improve access at and around the Project site during emergency evacuations. Further, as discussed in Section 3.17, Transportation, of this Draft EIR, during Project operations, unimpeded access throughout the Onsite Development Area would be maintained, as the City's development review and permitting process would provide that vehicles would not be parked or placed in a manner that would impede access for emergency response vehicles or evacuation egress. Additionally, perimeter and internal roadways would be maintained in such a condition to allow safe and unobstructed vehicular movement and would not result in evacuation delays.

As such, operation of the proposed Project would not substantially impair the capacity of Nichols Road, Pierce Street, Baker Street, or roadways adjacent to the Project site to accommodate Project and community evacuation and simultaneous emergency access.

Project Impacts on Evacuation Timing. There are no established thresholds related to evacuation timing, as each wildfire situation varies. Appendix G of the CEQA Guidelines establishes thresholds of significance for evacuation based on the potential of the Project to significantly impair or physically interfere with implementation of an adopted emergency response or evacuation plan, not evacuation time.

Pursuant to **RCM FIRE-1**, the future owner or owners of the Onsite Development Area would be required to formally adopt, practice, and implement a "Ready, Set, Go!" approach to evacuation, consistent with RCFD's adopted approach. This would include educational and informational outreach to warehouse staff to promote preparedness. As such, the proposed Project would encourage advance emergency preparation and early evacuation procedures. Additionally,

management of on-site entities occupying the Project site's structures would be required to register for emergency alerts via the Alert RivCo messaging system.

Further, as previously stated, the Project would implement roadway improvements to General Plan standards that would assist in vehicular circulation and reduce evacuation timing. Accordingly, no significant adverse effects to evacuation timing would occur under operations of the Project.

Need for Alternative Evacuation Plans. The proposed Project would conform to ignition-resistant building codes codified in Chapter 7A of the CBC, would be constructed of ignition-resistant materials, would include fire-safe fuel breaks and Fuel Modification Zones (FMZs), and would be defensible and designed to require minimal firefighting resources for protection. Specifically, the Project would feature Type 1 (Fire Resistive) tilt-up construction materials, installation of an NFPA 13 commercial interior fire sprinkler system, and minimum 100-foot on-site and off-site equivalent fuel modification. These features would provide emergency managers with options during wildfire-related evacuations and would enable the warehouse buildings to be used as contingency sheltering options in the unlikely scenario that evacuation is considered infeasible or the less safe option. Further, as previously described, the proposed Project includes roadway improvements to Nichols Road, Pierce Street, and Baker Street, which would improve access at and around the Project site during emergency evacuations, and help reduce the need for alternative evacuation routes. Therefore, the proposed Project would not contribute to the need for alternative evacuation plans.

Project Impacts on Existing Evacuation Plans. Primary vehicular access to the Onsite Development Area would be provided via Pierce Street and Baker Street via Nichols Road. All three roadways could accommodate egress from the Onsite Development Area in the event of an emergency. In the event of a large wildfire moving from north to south or east to west, it is most likely that evacuations would ultimately be directed to I-15 to exit the region, depending on the fire location and movement. The proposed Project would include improvements to select segments of Nichols Road, Pierce Street, and Baker Street, which would improve access at and around the Project site, and to I-15 during emergency evacuations.

An essential component of emergency evacuation plans is public preparedness in the event of an emergency in order to ensure effective implementation. Under **RCM FIRE-1,** as recommended in the FPP, the owner(s) of the proposed warehouse buildings would be required to provide "Ready, Set, Go!" evacuation education, consistent with RCFD's current approach. Specifically, the property owner and/or property management company shall provide warehouse employees with informational brochures at the time of onboarding, which will include an outreach and educational role to ensure fire safety measures detailed in the FPP have been implemented and development-wide "Ready, Set, Go!" plans prepared. With adherence to **RCM FIRE-1**, the proposed Project would not substantially impact existing evacuation plans in the city.

Adequacy of Emergency Access, Including the Project's Proximity to Existing Fire Services and the Capacity of the Existing Services. General and emergency vehicular access to the Onsite Development Area would be provided via Pierce Street and Baker Street via Nichols Road. The Onsite Development Area would be accessible via four proposed driveways (three along Baker

Street and one along Pierce Street). Building 1 would be accessible via one passenger vehicle driveway along Pierce Street and one 53-foot truck access driveway along Baker Street. Building 2 would be accessible via two 50-foot driveways along Baker Street that would be used by passenger vehicles and trucks. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed behind the rear of Building 2 that would extend to Building 1 for access to Pierce Street. The reciprocal access agreement would largely be intended to provide a secondary point of emergency access for Building 2. In addition, the proposed Project includes 37.86 acres of off-site improvements on Baker Street and Pierce Street and includes the realignment of Baker Street to Nichols Road.

All roadways and structures associated with the proposed Project would be constructed in accordance with City and RCFD emergency access standards, which would ensure adequate access to, from, and within the Project site for emergency vehicles. During emergency evacuation conditions, as under normal circumstances, vehicles would be required to yield to emergency vehicles in accordance with California Vehicle Code 21806(A)(1). Additionally, water availability, fire water flow, and hydrant placement throughout the proposed Project would be reviewed and verified by the RCFD to ensure compliance with local and State codes. **RCM PS-1**, discussed in Section 3.15, Public Services, of this Draft EIR, requires implementation of fire protection measures as required by existing regulations to ensure adequate first-responder access and capacity of hydrants.

The total number of direct permanent jobs anticipated by the proposed Project is approximately 483.[21] Assuming staggered shifts, approximately 374 persons are estimated to be present on the Project site at any given time. The FPP calculated annual emergency call volume for the Project site using RCFD's estimated call volumes and analyzing a worst-case scenario. The proposed Project's estimated working population at any given time is calculated to generate up to 30 calls per year (approximately 2.5 calls per month) under a worst-case scenario, most of which are anticipated to be medical-related calls.

In 2022, Rosetta Canyon Station No. 97 responded to approximately 1,700 incidents, for an average of approximately 142 calls per month. That same year, McVicker Park Station No. 85 responded to approximately 2,300 incidents, for an average of approximately 192 calls per month.

Accordingly, the worst-case scenario of 2.5 calls per month by the Project would represent minimal contributions of approximately 1.7 percent[22] and 1.3 percent[23] to the monthly call volumes of Rosetta Canyon Station No. 97 and McVicker Park Station No. 85, respectively. This level of service demand would not substantially raise the overall call volume within the overall context of nearby fire stations and therefore would not result in a significant impact.

As previously stated, while emergency response times from the closest responding stations could exceed applicable RCFD response time standards, the proposed Project would include a variety of Project design features to reduce the potential for wildfire spread prior to the arrival of

21 Dudek. 2025. *Fire Protection Plan Baker Industrial Project.* November.

22 (2.5 ÷ 142) × 100 = approximately 1.7 percent.

23 (2.5 ÷ 192) × 100 = approximately 1.3 percent.

emergency response teams. Relevant Project design features include Type 1 (Fire Resistive) tilt-up construction materials, installation of an NFPA 13 commercial interior fire sprinkler system, and minimum 100-foot on-site and off-site equivalent fuel modifications. Further, the proposed Project would also provide funding to support the provision of additional fire response infrastructure pursuant to the Fire Facilities Fee requirement set forth in Section 16.74.049 of the City of Lake Elsinore Municipal Code. Pursuant to existing regulations (included as **RCM PS-2** in Section 3.15, Public Services, of this Draft EIR), the Project Applicant would pay development impact fees related to fire facilities, fulfilling its requirement to fund its share of improvements. In addition, the Project Applicant would enter into a development agreement with the City and RCFD/CAL FIRE under which the Project would provide additional funding to the City for a future fire station or other infrastructure in closer proximity to the Project site.

The Onsite Development Area is currently undeveloped and sparsely vegetated with low-growing ruderal/grazed lands and nonnative grassland vegetation. The proposed Project would result in the development of the Onsite Development Area with two ignition-resistant warehouse buildings and associated hardscaping. The areas that are not hardscaped within the Onsite Development Area (e.g., irrigated and managed landscaping) would be located adjacent to low-flammability parking lots, roadways, and cement structures, thereby limiting ignition potential. Therefore, the proposed improvements would reduce the potential of the site to be part of a wildfire.

Project Impacts on Travel Times under Various Likely Scenarios. As previously discussed, the FPP modeled five different wildfire scenarios, which include the most likely to occur and worst-case scenarios, using the modeling software package BehavePlus (Version 6.0). This modeling provided information regarding flame lengths, intensities, and spread rates based on characteristics associated with each wildfire scenario. Two scenarios analyzed a wildfire approaching the Project site from the north/northwest, while the other three scenarios analyzed wildfires approaching from the east, south, and west. As such, fires from all directions were considered as possibilities. It should be noted that the FPP did not model specific emergency response or evacuation travel times under each of the five wildfire scenarios. It is reasonable to assume that evacuation travel times from the Project site would vary based on the direction of the wildfire's origin. For example, access to I-15, which is located to the northeast of the Onsite Development Area, may be inhibited by a wildfire spreading from the northeast. However, if access to I-15 is available, evacuation travel times could be reduced depending on the evacuation area and capacity of I-15 as a regional travel route.

The proposed Project would include improvements to select segments of Nichols Road, Pierce Street, and Baker Street. These improvements include paving Baker Street along the frontage of the Onsite Development Area and connecting Baker Street to Nichols Road, as well as paving Pierce Street from Nichols Road toward the southwest to connect to Hoff Avenue, to improve traffic circulation in the Project vicinity and create a second means of emergency access. These improvements would achieve the full build out of Baker Street and Pierce Street, consistent with the City's General Plan. With these improvements, the Project would build out the Project site and roadways as envisioned by the City's General Plan and would not result in significant adverse impacts on travel times to and from the Project site in the event of an evacuation scenario.

The FPP does provide an analysis of emergency response timing under a general construction or operation scenario. Based on this analysis, as presented above, RCFD's response times to an emergency at the Project site or in the Project vicinity would not fully conform to applicable RCFD response time standards as they would exceed the 6-minute first-in response time goal, which includes travel time, dispatch time, and turnout time. However, the Project Applicant would pay development impact fees related to fire facilities, fulfilling its requirement to fund its share of improvements and mitigate its potential impact. In addition, the Project Applicant would enter into a development agreement with the City and RCFD/CAL FIRE under which the Project would provide additional funding to the City for a future fire station or other infrastructure in close proximity to the Project site that would benefit travel times for emergency response personnel. As such, operation of the Project would result in a less than significant impact on travel times under various likely scenarios.

Based on the analysis presented above, construction and operation of the proposed Project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant** with adherence to existing regulations that would be implemented by the City during the development review and permitting process.

Threshold 3.20.2: Would the project, 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 with Mitigation Incorporated. Wildfire behavior is largely driven by topography, fuel, climatic conditions, and weather (such as low humidity and high winds). Project placement on the landscape relative to fire history, topography, and wind patterns, combined with Project design and Project density, influences the potential risk of loss, injury, or death involving wildfires. Typically, steep terrain results in faster fire spread upslope and slower fire spread downslope in the absence of wind. During summer and fall, before the rainy period, there is an increased threat of fire in Lake Elsinore, especially during dry Santa Ana wind events, which can be particularly strong in the Project area as warm and dry air is channeled through the mountains. The Santa Ana winds dry out and preheat vegetation and accelerate oxygen supply, thereby enabling the burning of fuels that otherwise might not burn under cooler, moist conditions.

Additionally, fire spread and structure loss are more likely to occur in low- to intermediate-density developments because there are more people present to ignite a fire (compared to undeveloped land) and the development is not concentrated enough (compared to high-density developments) to disrupt fire spread by removing or substantially fragmenting wildland vegetation. By contrast, if a Project site includes physical features that could prevent or slow the spread of fire, such as combustion-resistant structures and facilities, the design of the development may provide fuel breaks that would reduce the potential for a fire to occur or spread.

The fire behavior modeling analysis presented in the FPP prepared for the proposed Project (Appendix P to this Draft EIR) incorporated observed fuel types representing the dominant on-site and off-site vegetation on vacant, undeveloped land adjacent to the Onsite Development Area, in addition to

slope gradients, and wind and fuel moisture values derived from the closest Remote Automated Weather Station (RAWS) weather data sets. These modeling efforts also included scenarios in which FMZs had been incorporated into the Project site, including establishment of irrigated/drought-tolerant landscapes and hardscape areas on the periphery of the proposed buildings, as well as interior landscape requirements. According to the modeling results, the expected surface flame length and intensity of modeled fires were significantly lower in areas that are proposed for landscaping. Thus, the proposed landscaping would reduce, not exacerbate, wildfire risks.

The Project-specific FPP (Appendix P to this Draft EIR) addresses water supply/availability, fire water flow, hydrant placement, defensible space, building ignition and fire resistance, and fire protection systems, among other pertinent CFC criteria. The proposed Project would convert the Onsite Development Area to ignition-resistant warehouse structures, roads, and landscaping. Vegetative fuels within proposed FMZs would be removed or replaced with less flammable species, resulting in a perimeter wildfire buffer. Pursuant to **Mitigation Measure (MM) FIRE-1,** the property owner shall annually ensure that FMZs within the Project site are properly maintained. Further, landscaped areas would be located adjacent to low-flammability parking lots, roadways, and structures, thereby limiting ignition potential. According to the 2022 Wildfire Guidance and the FPP (Appendix P to this Draft EIR), the proposed Project is the type of development that reduces wildfire risk based on its ability to provide for evacuations and contingency on-site shelter within the proposed warehouse facilities.

The proposed warehouse structures would conform to ignition-resistant building codes codified in Chapter 7A of the CBC and, therefore, would be constructed of ignition-resistant materials, would include fire-safe fuel breaks and FMZs, and would be defensible and designed to require minimal firefighting resources for protection. The Project would feature Type 1 (fire-resistive) tilt-up construction materials, installation of an NFPA 13 commercial interior fire sprinkler system, and minimum 100-foot on-site and off-site equivalent fuel modification.

As such, the proposed structures would be "fire-hardened," meaning precautions have been taken, as described above, to reduce a structure's susceptibility to burning in a wildfire. These features would provide emergency managers with options during evacuations and would allow the warehouse buildings to be used as a contingency sheltering option in the unlikely scenario that evacuation is considered infeasible or the less safe option. Additionally, these features would create a buffer between open-space areas in the Project site vicinity that feature sources of ignition.

Furthermore, water availability and flow would be consistent with requirements including fire flow and hydrant distribution required by local and State codes. The improved connectivity of water lines and installation of fire hydrants along fire access roadways and adjacent to the proposed warehouses would aid in fire suppression in the unlikely event of a wildfire. Further, the proposed Project would be subject to the existing CFC (included as **RCM PS-1**), which would require the implementation of fire protection measures, including water supply/fire flow requirements, minimum fire hydrant requirements, fire department access requirements, and fire alarm/sprinkler requirements to ensure adequate first responder access and capacity of hydrants.

As prescribed in Section 3.15, Public Services, **RCM PS-2** requires the payment of a Fire Facilities Fee pursuant to Section 16.74.049 of the City of Lake Elsinore Municipal Code. Under **RCM PS-2**, the Project Applicant would pay development impact fees related to fire facilities, fulfilling its

requirement to fund its share of improvements and mitigate its potential impact. In addition, and above what is required, the Project Applicant would enter into a development agreement with the City and RCFD/CAL FIRE under which the Project would provide additional funding to the City for a future fire station or other infrastructure in closer proximity to the Project site.

As specified in **RCM FIRE-2**, the proposed Project would be required by the City, through the development review and permitting process, to implement the Project-specific FPP detailing the ignition-resistant construction of the proposed buildings, FMZs, and defensible space in the event of a wildfire emergency. The FPP would be subject to review and approval by the RCFD and would be required by occupancy permit to be posted in areas visible to occupants of the warehouse buildings. Furthermore, as described above, the proposed Project would include improvements to Nichols Road, Pierce Street, and Baker Street, which would improve access at and around the Project. Therefore, with implementation of **RCM FIRE-2, RCM PS-1, RCM PS-2,** and **MM FIRE-1**, impacts related to exacerbating wildfire risks due to slope, prevailing winds, or other factors would be **less than significant**.

Threshold 3.20.3: Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant. Utility and infrastructure improvements included as part of the proposed Project are discussed in Chapter 2.0, Project Description, and analyzed in Section 3.19, Utilities and Service Systems, of this Draft EIR.

Potable water and wastewater infrastructure would be installed at the Project site and would connect to existing infrastructure in surrounding streets, particularly Baker Street and Pierce Street. The proposed Project includes new storm drain outlets and lines, as well as modular wetlands, to collect, store, and treat stormwater generated on the Project site. Lastly, the proposed Project would include connections to surrounding electrical infrastructure at nearby Fogarty Substation via a distribution circuit extension along Terra Cotta Road to Nichols Road to Pierce Street. Under existing conditions, aboveground power lines are located along Baker Street, which would remain in place under the proposed Project.

As previously stated, the Project includes improvements to select segments of Nichols Road, Pierce Street, and Baker Street. These improvements include paving Baker Street along the frontage of the Onsite Development Area and connecting Baker Street to Nichols Road, as well as paving Pierce Street from Nichols Road toward the southwest to connect to Hoff Avenue. These improvements would improve circulation within and around the site by completing the full build out of Baker Street and Pierce Street consistent with the General Plan Circulation Element.

As previously discussed, the Project site is in a VHFHSZ in an LRA. Although the proposed Project would require installation and extension of utility connections, these improvements would be located underground and would not exacerbate fire risk. Project design and implementation of utility improvements would be reviewed and approved by the City's Public Works Department as part of the

proposed Project's approval process to ensure the Project is compliant with all applicable CFC requirements, design standards, and regulations.

Pursuant to **RCM FIRE-2**, the proposed Project includes irrigated managed landscaping consistent with the applicable FMZ requirements specified in the FPP (Appendix P to this Draft EIR) that reduce potential impacts related to landscaping. The fuel breaks provided by internal roads, roadways along the Project perimeter, and parking areas would reduce (and not exacerbate) fire risk. Furthermore, the Project site would be developed in accordance with applicable CBC, CFC, and Lake Elsinore Municipal Code regulations and the FPP, including requiring all on-site structures to be "fire-hardened," including minimum fire flow requirements, fire hydrant placement, emergency responder access, and sprinkler systems. Therefore, the proposed Project would not require the installation or maintenance of infrastructure (e.g., roads, fuel breaks, emergency water sources, powerlines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be **less than significant**.

Threshold 3.20.4: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant with Mitigation Incorporated. After a wildfire passes through an area, post-fire hazards can occur based on conditions of the topography and susceptibility to flooding.

Landslides. Post-fire landslide hazards include fast-moving, highly destructive debris flows that can occur in the years immediately after wildfires in response to high-intensity rainfall events, and those flows that are generated over longer time periods accompanied by root decay and loss of soil strength.[24] Post-fire debris flows are specifically hazardous because they can occur with little warning, can exert great impulsive loads on objects in their paths, and can strip vegetation, block drainage ways, damage structures, and endanger human life. Wildfires also have the potential to destabilize preexisting deep-seated landslides over long time periods.

According to the FPP (Appendix P to this Draft EIR), the Project site is characterized by topography ranging from slightly hilly to flat and generally slopes from southwest to northeast. As discussed in Section 3.7, Geology and Soils, of this Draft EIR, the Onsite Development Area includes slopes of up to 25 degrees, with elevations ranging between approximately 1,260 feet and 1,400 feet above mean sea level. The proposed Project includes retaining walls along all sides of the Onsite Development Area, including a concrete retaining wall up to 45 feet tall constructed of cement, shotcrete, and ground anchor/soil nail grout along the southwestern boundary of the Onsite Development Area to globally stabilize the slopes south and west of the Project site. Further, the Geotechnical Evaluation prepared for the proposed Project (Appendix G-1 to this Draft EIR) included a slope stability analysis, which determined that the Project site is stable. In addition, the Geotechnical Evaluation provided recommendations for the design of the proposed retaining walls to ensure that slopes are properly stabilized, which the proposed Project would adhere to

[24] United States Geological Survey. Natural Hazards. "What Should I Know about Wildfires and Debris Flows?" https://www.usgs.gov/faqs/what-should-i-know-about-wildfires-and-debris-flows?qt-news_science_products=0#qt-news_science_products (accessed May 21, 2025).

as required under **MM GEO-1**. Adherence to **MM GEO-1** would reduce the proposed Project's vulnerability to post-fire landslide conditions if wildfire were to spread throughout the Project site. As described above, the proposed Project would be required to comply with the measures of the approved FPP, pursuant to **RCM FIRE-2**, which would include various strategies to reduce the potential for wildfire to spread throughout the Project site.

In the event that wildfire should spread to the Onsite Development Area or the remainder of the Project site, it would not expose any on-site slopes to erosion and potential failure. The Project site would not contain any steep slopes that are prone to landslide following the installation of the proposed retaining walls. The proposed Project would not expose people or structures to significant risks, including downslope landslides, as a result of runoff, post-fire slope instability, or drainage changes, and impacts would be **less than significant with mitigation incorporated**.

Flooding and Drainage. According to FEMA Flood Insurance Rate Map (FIRM) No. 06065C2028G (effective August 28, 2008), approximately 78 percent of the Project site is mapped as within Zone X (area of minimal flood hazard and area with 0.2 percent annual chance of flood hazard), approximately 16 percent is within Zone A (1 percent annual chance of flood hazard), and approximately 6 percent is within Zone AE (regulatory floodway).[25] The Onsite Development Area, which would contain the proposed warehouse buildings, is located entirely within Zone X and therefore would not be subject to significant flooding hazards during a 100-year storm event.

The proposed Project would be required to adhere to the FPP approved by the City and RCFD (Appendix P to this Draft EIR). Compliance with the FPP and implementation of existing regulations (included as **RCM PS-1**), requiring CFC measures to ensure adequate first-responder access and capacity of hydrants, would reduce the likelihood of urban conflagration, or an extensive urban wildfire that destroys land or property,[26] on the Project site in the unlikely event of a wildfire. As discussed in Section 3.10, Hydrology and Water Quality, of this Draft EIR, proposed on-site stormwater facilities, corrugated metal pipe detention systems, and modular wetlands would be capable of detaining the design capture volume (DCV) so that stormwater runoff does not exceed the capacity of the existing stormwater drainage system. The Low Impact Development (LID) is a design approach to stormwater management that mimics a site's pre-development hydrologic conditions to the extent possible through various site design techniques.[27] LID features would be implemented to recreate natural flow characteristics and promote natural movement of stormwater runoff on the Project site, as required under the Riverside County Municipal Separate Storm Sewer Systems (MS4) Permit Program.

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25 Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (FIRM) No. 06065C2028G. August 28.

26 National Fire Sprinkler Association. 2022. What is Conflagration? Understand This Growing Concern in Fire Protection. October 25. Website: https://nfsa.org/2022/10/25/what-is-conflagration-a-growing-concern/ (accessed June 26, 2025).

27 Riverside County Flood Control District. 2012. Low Impact Development: Guidance and Standards for Transportation Projects for the Santa Ana Region Riverside County Co-Permittees. October. Website: https://content.rcflood.org/downloads/NPDES/Documents/SA_WQMP/EXHIBIT%20D.pdf (accessed June 26, 2025).

In the event that wildfire should spread to the Project site, it is not expected that the proposed Project would contribute any additional runoff or sedimentation to adjacent parcels or downstream drainages. This is due to the retaining walls proposed on the Project site and the fact that the drainage improvements would remain intact after a major wildfire, allowing them to continue to reduce the potential for flooding conditions in downstream storm drain facilities. Therefore, downslope or downstream flooding as a result of runoff, post-fire slope instability, or drainage changes are unlikely to expose occupants or structures on the Project site to significant risks. Therefore, impacts to on-site occupants related to post-wildfire flooding risks would be **less than significant**.

3.20.7 Level of Significance Prior to Mitigation

Impacts related to wildfire through conflicts with adopted emergency response plan or emergency evacuation plan would be potentially significant prior to mitigation.

3.20.8 Regulatory Compliance Measures and Mitigation Measures

The following regulatory compliance measures are applicable to the proposed Project.

RCM FIRE-1 **Evacuation Education and Preparedness.** Pursuant to the "Ready, Set, Go!" approach adopted by California Department of Forestry and Fire Protection (CAL FIRE), the property owner and/or property management company shall provide evidence to the Director of the City of Lake Elsinore Building Department, or designee, that the tenant has established an educational program for new employees during the onboarding process, through which informational brochures are provided, including an outreach and educational role to ensure fire safety measures detailed in the Project-specific Fire Protection Plan (FPP) prepared for the proposed Project by Dudek in 2025 have been implemented and development-wide "Ready, Set, Go!" plans have been prepared.

RCM FIRE-2 **Adherence to the Fire Protection Plan.** Prior to the issuance of occupancy permits, the Director of the City of Lake Elsinore Building Department, or designee, shall confirm that the proposed Project adheres to the Project-specific FPP prepared for the proposed Project by Dudek in 2025 and implement the specific measures presented in the document, as required by the City's Municipal Code. The following measures shall be implemented to reduce impacts associated with wildfires:

1. The proposed Project buildings shall be constructed of ignition-resistant construction materials that resist ignition or sustained flaming combustion sufficiently to reduce losses from wildland-urban interface conflagrations under worst-case weather and fuel conditions with wildfire exposure of burning embers and small flames, as prescribed in California Building Code Chapter 7A and State Fire Marshal Standard 12-7A-5, Ignition-Resistant Materials. Buildings shall also include automatic

fire sprinkler systems based on the latest adopted California Building and Fire codes for occupancy types.

2. Fuel modification shall be provided around the perimeter of both buildings, as required by Riverside County Fire Department (RCFD), and shall be a minimum of 100 feet wide in all directions through on-site Fuel Modification Zones (FMZs) or a combination of on-site and off-site FMZ equivalent areas.

3. Landscape plantings shall not utilize plants prohibited by the RCFD that have been found to be highly flammable.

4. Aerial fire apparatus access roads (i.e., public and private streets) shall be provided throughout the warehouse development and will vary in width and configuration, but shall all provide at least the minimum required unobstructed travel lanes, lengths, turnouts, turnarounds, width, and clearances required by applicable codes. Primary access and internal circulation shall comply with the requirements of the RCFD.

5. Water capacity and delivery shall be provided by a reliable water source for operations and during emergencies requiring extended fire flow.

6. Should future iterations of the Project's site plan result in buildings that do not achieve a minimum of 100 feet of defensible space, alternative materials and methods may be proposed to provide the functional equivalency of a full 100 feet of defensible space. Alternative materials and methods shall be to the satisfaction of the RCFD and may include structural hardening enhancements or landscape features, like noncombustible walls.

RCM TRA-1 Transportation Management Plan. *(See Section 3.17, Transportation)*

RCM PS-1 Regulatory Fire Protection Measures. *(See Section 3.15, Public Services)*

RCM PS-2 Development Impact Fees, Chapter 16.74 of the City of Lake Elsinore Municipal Code. *(See Section 3.15, Public Services)*

The following mitigation measures would be implemented as part of the proposed Project.

MM FIRE-1 **Fuel Modification Zone Maintenance.** Prior to May 1 of each year, the property owner and/or property management company shall hire a third-party, Riverside County Fire Department (RCFD) approved Fuel Modification Zone inspector to provide annual certification to the Director of the City of Lake Elsinore Building Department, or designee, that the maintenance completed throughout the Project site meets the requirements of the Project-specific Fire Protection Plan prepared by Dudek in 2025.

MM GEO-1 **Compliance with California Building Code and Recommendations Provided in Geotechnical Evaluation.** *(See Section 3.7, Geology and Soils)*

3.20.9 Level of Significance after Mitigation

With adherence to **RCMs FIRE-1, FIRE-2**, **GEO-1**, **TRA-1**, **PS-1**, and **PS-2**, and implementation of **MM FIRE-1**, the proposed Project would not substantially impair an adopted emergency response plan or emergency evacuation plan; expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, or other factors; exacerbate fire risk or result in temporary or ongoing impacts to the environment; or expose people or structures to significant risks as a result of runoff, post-fire slope instability, or drainage changes. Impacts would be **less than significant with mitigation incorporated.**

3.20.10 Cumulative Impacts

As defined in Section 15355 of the *State CEQA Guidelines,* cumulative impacts are the incremental effects of an individual project when viewed in connection with the effects of past, current, and reasonably foreseeable probable future projects within the cumulative study area for wildfire. The purpose of this section is to evaluate any additional incremental impact that the proposed Project may cause in combination with impacts of past, present, and probable future projects in the cumulative study area for wildfire, including the cumulative projects listed in Section 3.0 and shown on Figure 3-1. For the purposes of this analysis, the cumulative study area for wildfire includes the immediate vicinity of the Project site that would be affected by wildfire scenarios near the Project site and that would be served by the same RCFD stations as the proposed Project.

The proposed Project could result in an increased number of emergency and public service calls due to the increased presence of structures, traffic, and population on the previously undeveloped Project site. However, the proposed Project would pay the baseline development impact fees related to fire facilities pursuant to Section 16.74.049 of the City of Lake Elsinore Municipal Code (**RCM PS-2**) but would also pay additional fees to the City to assist in funding a future fire station to provide for cumulative fire facility needs.

As described previously, the Project-specific FPP (Appendix P to this Draft EIR) details water supply/availability, fire water flow, hydrant placement, defensible space, building ignition and fire resistance, and fire protection systems, among other pertinent fire protection criteria that would reduce the Project's potential to result in an impact that could be cumulatively considerable.

Based on a comparison between Figure 3-1 and CAL FIRE's VHFHSZ mapping tools,[28] several of the cumulative projects may be located in designated fire hazard severity zones or within a WUI. Any such, projects approved and developed within fire hazard severity zones would be required to comply with applicable provisions of the CFC, including provisions related to development within fire hazard zones and the WUI. Additionally, adherence to the CBC and City requirements related to the type, method, and manner of construction, and the establishment and maintenance of FMZs would reduce the site-

[28] California Department of Forestry and Fire Protection. 2025. Fire Hazard Severity Zone Viewer. March. Website: https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessed June 26, 2025).

specific wildfire impacts of each cumulative project. Upon compliance with existing regulations, potential impacts would not be cumulatively considerable.

During construction and operation of the proposed Project, adequate access for emergency vehicles would be required to be maintained. The improvements to Baker Street, Pierce Street, and Nichols Road would improve circulation within and around the site by completing the full build out of Baker Street and Pierce Street consistent with the General Plan Circulation Element, which could be used for emergency access and evacuation. Similarly, cumulative development would be required to accommodate emergency access along and/or through their respective sites. Roadway improvements would conform to established emergency access requirements established by the City and RCFD, applicable provisions of the 2022 CFC and CBC, and/or other necessary fire authority requirements that would be confirmed through the permitting process. The proposed roadway improvements would provide access around the Project site that would facilitate emergency evacuations at the site and surrounding areas, which would provide a cumulative benefit.

Implementation of the proposed Project, when considered along with the impacts of past, present, and reasonably foreseeable probable future projects in the city of Lake Elsinore, would not result in a significant cumulative impact related to wildfire. The proposed Project and cumulative projects are required to adhere to City, County, State, and federal regulations designed to reduce and/or avoid impacts related to wildfire, including flooding hazards and landslides after a wildfire event. With compliance with these regulations, as required by **RCM GEO-1** to reduce vulnerability of post-fire landslide conditions if a wildfire were to spread to the Project site, **RCM FIRE-1**, to ensure improvements within the active development area are in place (including utilities, operable fire hydrants, and approved temporary roadway surfaces) and construction-phase fuel modification zones are established, **RCM FIRE-2** to ensure that the proposed Project implements and adheres to the Project-specific FPP, **RCM TRA-1** to maintain traffic flow during both normal and emergency traffic operations, **RCM PS-1** to implement CFC measures to ensure adequate first-responder access and capacity of hydrants, and **RCM PS-2** to implement payment of current development impact fees related to fire facilities, cumulative impacts of the proposed Project related to wildfire would be **less than significant**.

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4.0 OTHER CEQA CONSIDERATIONS

Section 15126 of the *California Environmental Quality Act (CEQA) Guidelines* requires that all aspects of a project be considered when evaluating its impacts on the environment, including planning, acquisition, development, and operation. The Environmental Impact Report (EIR) must identify the significant environmental effects that cannot be avoided (see analysis of specific environmental issues in Chapter 3.0, Environmental Analysis, Impacts, and Mitigation Measures), the growth-inducing impact of the Baker Street Warehouse Project (proposed Project) (see Section 4.3, below), and alternatives to the proposed Project (see Chapter 5.0, Alternatives), in addition to any mitigation measures proposed to minimize the significant effects of the proposed Project.

4.1 SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

As required by Section 15126(b) of the *CEQA Guidelines,* even with implementation of the mitigation measures identified in Chapter 3.0, Table 4.A: Significant Environmental Effects That Cannot Be Avoided identifies the significant unavoidable impacts anticipated to result from the proposed Project.

Table 4.A: Significant Environmental Effects That Cannot Be Avoided

Topic/Section	Impact	Significance Determination	Details of Impact
Air Quality (3.3.6)	Implementation of the proposed Project would conflict with implementation of the applicable air quality plan.	Significant and Unavoidable	Implementation of the Project would not be consistent with the South Coast Air Quality Management District (SCAQMD) 2022 Air Quality Management Plan (AQMP) because operation of the Project would exceed established SCAQMD thresholds for maximum daily emissions of criteria pollutants despite the incorporation of operational practices and design features cited in **Mitigation Measures (MMs) AQ-1** through **AQ-10** and **Project Design Features (PDFs) AQ-1** through **AQ-5.**
Air Quality (3.3.6)	Implementation of the Project would result in a cumulatively considerable net increase of criteria pollutants for which the Project region is in nonattainment under an applicable federal or State ambient air quality standard.	Significant and Unavoidable	Emissions associated with operation of the Project would exceed established SCAQMD thresholds. Despite the incorporation of operational practices and design features cited in **MMs AQ-1** through **AQ-10** and **PDFs AQ-1** through **AQ-5**, operation of the Project would result in significant and unavoidable impacts related to emissions of nitrogen oxides (NO_X).
Air Quality (3.3.10)	Operation of the Project would result in a cumulative exceedance of SCAQMD emission thresholds.	Significant and Unavoidable	The Project's long-term operational emissions would exceed SCAQMD's criteria pollutant thresholds for NO_X. SCAQMD's operational emissions thresholds are designed to accomplish regional emissions goals. Although **MMs AQ-1** through **AQ-10** and **PDFs AQ-1** through **AQ-5** would reduce emissions to the extent feasible, Project emissions would remain significant and unavoidable. Therefore, the Project's operations would result in a significant and unavoidable cumulative increase in long-term regional emissions.

Table 4.A: Significant Environmental Effects That Cannot Be Avoided

Topic/Section	Impact	Significance Determination	Details of Impact
Greenhouse Gas Emissions (3.8.6)	Implementation of the Project would generate GHG emissions that may have a significant impact on the environment.	Significant and Unavoidable	Project-related greenhouse gas (GHG) emissions would exceed the 3,000-metric-ton (MT) carbon dioxide equivalent (CO_2e) per year threshold. While the implementation of **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3** would reduce GHG emissions to the extent feasible, the majority of the GHG emissions are associated with mobile sources. No additional feasible measures are available that would further reduce GHG emissions because emissions of motor vehicles are controlled by State and federal standards, and the City and Applicant have no control over these standards.
Greenhouse Gas Emissions (3.8.6)	Implementation of the Project would conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emission of GHGs.	Significant and Unavoidable	The Project would not conflict with local, regional, and statewide plans, policies, programs, and regulations that have been adopted for the purpose of reducing GHG emissions. Despite this consistency, the Project's long-term operational activities would generate GHG emissions that exceed the threshold of 3,000 MT CO_2e per year despite implementing **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3**. Thus, the Project may impede various plans' long-term GHG reduction goals (e.g., for 2030 and 2050), and a significant and unavoidable impact would occur.
Greenhouse Gas Emissions (3.8.10)	Operation of the Project would result in a cumulatively considerable exceedance of GHG emission thresholds.	Significant and Unavoidable	Since GHG is a global issue, the proposed Project is not expected to generate enough GHG emissions to influence global GHG emissions on its own; however, because Project-related CO_2e emissions would exceed the scaled SCAQMD thresholds even with implementation of **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3**, the proposed Project would have a significant contribution to cumulatively considerable GHG emission impacts.

Source: LSA, *Draft Environmental Impact Report for the Baker Street Warehouse Project, City of Lake Elsinore, State Clearinghouse Number 2024070504*, Chapter 3 (December 2025).

Section 15126(c) of the *CEQA Guidelines* mandates that the EIR must address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented. Section 15126.2(d) of the *CEQA Guidelines* provides that an impact would fall into this category if it resulted in any of the following:

- The project would involve a large commitment of nonrenewable resources.
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses.
- The project involves uses in which irreversible damage could result from any potential environmental accidents associated with the project.

Determining whether the proposed Project may result in significant irreversible effects requires a determination of whether key resources described below would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project would commit the site to the

uses detailed in Chapter 2.0, Project Description. Through the lifetime of any industrial use constructed, the Project site would be unavailable for other uses.

4.1.1 Energy Resources

Under existing conditions, the Project site consists of undeveloped land and public road rights-of-way (ROWs). Therefore, there is currently no energy demand associated with the Project site. Natural resources in the form of construction materials and fuels would be utilized in the construction of the Project, and energy resources in the form of electricity and natural gas would be used during its long-term operation; however, their use is not expected to have a negative impact on the availability of these resources. Although the exact year/model of vehicles used by construction employees cannot be accurately predicted, in general, updated Corporate Average Fuel Economy (CAFE) regulations have established fuel efficiency standards for model years 2024 through 2026. These updated standards require fuel efficiency increases of 8 percent annually for model years 2024 and 2025, and 10 percent annually for model year 2026. As fuel efficiencies are increased over time, operation of the Project would utilize a vehicle mix that proportionally reduces the amount of fuel used.

As detailed in Table 3.6.B, the estimated annual operational energy use required by the Project includes:

- **Electricity:** 7,117,782 kilowatt-hours [kWh] (or 7.118 gigawatt-hours [GWh]);
- **Natural Gas:** 23,194 therms;
- **Gasoline:** 354,294 gallons; and
- **Diesel:** 931,623 gallons.

According to the California Energy Commission (CEC), total electricity consumption in the Southern California Edison (SCE) service area in 2022 was 85,870 GWh (85,869,985,679 kWh). Of this total, Riverside County consumed 17,780 GWh (17,780,573,271 kWh). Therefore, operation of the proposed Project would negligibly increase the annual electricity consumption in Riverside County by approximately 0.04 percent. Further, the proposed Project would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Energy Code. The Energy Code establishes minimum energy efficiency requirements for new buildings and additions or alterations to existing buildings.

The proposed Project would use all-electric appliances without any natural gas connections and would not include the use of propane or other fossil fuels for space heating, water heating, or indoor cooking. The proposed Project would not require the use of natural gas except for use of the on-site cargo handling equipment within the Onsite Development Area. Total natural gas consumption in Riverside County in 2022 was approximately 431,052,392 therms. Therefore, use of the on-site cargo handling equipment would negligibly increase the annual natural gas consumption in Riverside County by less than 0.01 percent.

The proposed Project would also result in energy usage associated with gasoline and diesel fuel consumed by Project-related vehicle trips. Based on fuel consumption obtained from the California Air Resources Board's (CARB) EMFAC2021 model, approximately 615.4 million gallons of gasoline and 347.1 million gallons of diesel were consumed from vehicle trips in Riverside County in 2024.

Therefore, vehicle trips associated with the proposed Project would increase the annual fuel use in Riverside County by 0.06 percent for gasoline and approximately 0.27 percent for diesel fuel usage. Further, the proposed Project would include electric vehicle (EV) charging infrastructure that, at a minimum, would meet the Tier 2 Nonresidential Voluntary Measures of the California Green Building Standards Code, Section A5.106.5.3.2. The proposed Project is designed to include 24 EV charging spaces installed and operational upon completion, with infrastructure in place to accommodate an additional 69 EV charging spaces for future use, which would help to reduce fuel usage associated with the proposed Project. Additionally, the proposed Project would be required to comply with applicable current and future regulatory requirements, which include (through vehicle manufacturer compliance): Advanced Clean Cars II, Advanced Clean Trucks, Advanced Clean Fleets, Zero Emission Forklifts, the Off-Road Zero-Emission Targeted Manufacturer rule, Clean Construction Program, In-Use Off-Road Diesel-Fueled Fleets Regulation, Off-Road Zero-Emission Targeted Manufacturer Rule, Amendments to the In-Use Off-Road Diesel-Fueled Fleets Regulation, carbon pricing through the Cap-and-Trade Program, and the Low Carbon Fuel Standard. Compliance with these requirements would also help to reduce fuel usage associated with the proposed Project.

Although the Project would increase energy demand, its implementation of applicable energy efficiency standard features during and post-development would ensure the Project would not significantly impact the availability of energy resources. As a result, operation of the proposed Project would not result in the significant irretrievable loss of nonrenewable fuels or impact the availability of these energy resources for future generations or for other uses for the life of the Project.

4.1.2 Agricultural Resources

As early as 1938 to circa 1962, the Project site was a rural residential property with limited agriculture activity. From 1963 to present, the Project site has had minimal to no agricultural use. According to the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP),[1] the majority of the Project site is designated as "Farmland of Local Importance." Portions of the Project site along the southwestern Project site boundary are designated as "Other Land," and the northeasternmost portion of Nichols Roads within the Offsite Improvements Area is designated as "Urban and Built-Up Land." Farmland of Local Importance is not considered Important Farmland pursuant to Appendix G of the *State CEQA Guidelines*; therefore, the conversion of Farmland of Local Importance to non-agricultural uses is not considered a significant impact to agricultural lands.

The Project site is not currently, nor has it recently been, used for agricultural production. Further, the City's General Plan designates the Project site as Limited Industrial and Floodway, and the Project site has zoning designations of Limited Manufacturing, General Manufacturing, and Open Space/Floodway. As such, the Project site is not designated or zoned for agricultural use. Even with the zoning change proposed under the Project, neither the Project's existing nor proposed land use and zoning designation are intended for agricultural operations on the Project site or surrounding area.

[1] California Department of Conservation. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/app/ (accessed July 11, 2024).

No agricultural production currently exists on the Project site, nor is the site designated as farmland by the State or the City; therefore, no permanent and irreversible conversion of agricultural land would occur.

4.1.3 Mineral Resources

The Project site is designated Mineral Resource Zone (MRZ) 3, a designation assigned to areas that contain known or inferred mineral occurrences of unknown significance. However, the Project site has no history of mineral resource-related uses, including on-site mining or oil and gas production. Additionally, the City's General Plan does not designate the Project site as being within a land use designation that allows for mineral extraction, nor does the City designate the Project site as an area held in reserve for future mining activities. Even with the zoning change proposed as part of the Project, neither the Project's existing nor its proposed zoning designation would allow for mineral resource extraction at the Project site or surrounding area. Moreover, the Project would not impair or degrade access to any nearby mineral production facilities. The nearest active mine to the Project site is the Nichols Canyon Mine, located 0.3 mile northeast of the Project site on the opposite (east) side of Interstate (I-)15. Development of the proposed Project would not impact mineral extraction activities at the Nichols Canyon Mine because development of the proposed Project would occur on the other side of I-15 and would not interfere with mineral extraction activities by introducing any land uses that would be incompatible with mining operations. Therefore, implementation of the proposed Project is not likely to permanently and irreversibly preclude future recovery of significant mineral resources, if any, on the Project site.

4.1.4 Biological Resources

As previously stated, the Project site consists of undeveloped land and public road ROWs under existing conditions. Biological resources on the Project site were evaluated through various reconnaissance-level biological resource assessments and focused field studies conducted at the site between 2020 and 2025, including: a general biological field survey, vegetation mapping, a burrowing owl habitat suitability assessment, focused burrowing owl surveys, focused fairy shrimp surveys (wet and dry), focused Least Bell's vireo surveys, focused southwestern willow flycatcher surveys, rare plant surveys, Crotch's bumble bee surveys, and a jurisdictional delineation as detailed in the *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*[2] and the *Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas and Vernal Pools, and Narrow Endemic/Criteria Area Plants for the Baker Industrial Project*.[3]

The Project site supports nine vegetation communities and land covers, including Alkali Grassland, Alkali Playa, Disturbed/Developed, Open Water, Riversidean Sage Scrub, Semi-Natural Herbaceous Grassland, Disturbed Semi-Natural Herbaceous Grassland, Southern Willow Riparian Scrub, and

[2] Glenn Lukos Associates, Inc. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. September 2 (Appendix D-1).

[3] Glenn Lukos Associates, Inc. 2024. *Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas and Vernal Pools, and Narrow Endemic/Criteria Area Plants for the Baker Industrial Project.* February 28. Revised March 6, 2025, May 14, 2025, and July 3, 2025 (Appendix D-2).

Vernal Pool. Several special-status plant and animal species were detected as occurring within the Project site, including San Diego ambrosia, San Jacinto Valley crownscale, vernal barley, Coulter's goldfields, small-flowered microseris, Crotch's bumble bee, western spadefoot, Cooper's hawk, California horned lark, yellow-breasted chat, yellow warbler, and Least Bell's vireo. Additionally, little mousetail may be present on site despite not being detected during focused surveys, and burrowing owl may inhabit the site prior to construction despite not being detected during focused surveys.

The Project site is within the boundaries of the Western Riverside County Multiple-Species Habitat Conservation Plan (MSHCP), and approximately 89.44 acres of the Project site are within a Western Riverside County MSHCP Criteria Cell. Specifically, the Project site is located within MSHCP Criteria Cells 4157, 4166, 4169, and 4266 and Cell Group W (Cells 4060 and 4067) in Subunit 3: Elsinore.[4] However, the development footprint is not within areas described for conservation or development is within existing roadways (not planned for road expansion).

According to the *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*, the Project site contains three vernal pools (Vernal Pools 1, 2, and 3) consisting of 1.72 acres of Regional Water Quality Control Board (RWQCB) wetland waters of the State (WOTS), as well as Alberhill Creek, consisting of 2.33-acres of United States Army Corps of Engineers (USACE) wetland waters of the United States (WOTUS)/RWQCB wetland WOTS. While Alberhill Creek is located within the Restoration Area and would remain as is, Project implementation would result in 0.17 acre of impacts to vernal pools (Vernal Pools 2 and 3) prior to mitigation.

The *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California* determined that implementation of the Project would not impact any MSHCP Linkages. The Project site is situated between areas of natural habitat given that it is generally bound by undeveloped, vacant land to the north, east, south, and west. Features (e.g., mountain canyons or riparian corridors) typically used by wildlife as corridors are present within the Project site; therefore, Project implementation could affect local wildlife movement. The Project would support MSHCP goals relating to wildlife movement through the conservation of 33.66-acre Restoration Area. Significant impacts to wildlife corridors or nursery sites are not expected from construction or operational activities of the proposed Project.

Implementation of the proposed Project would result in the removal of existing vegetation, modification of topography, and subsequent construction of two industrial warehouse buildings and supporting infrastructure that represents a permanent and irreversible change in the nature of on-site biological resources. However, the Project also provides for restoration of 33.66 acres of resource area, and conversion of the site to developed uses has been previously considered by the City through its designation of the site for Limited Industrial development in its General Plan.

[4] A Criteria Cell is a roughly 160-acre rectangle overlaid onto parcels within the MSHCP Plan Area and that has areas described for conservation (i.e., reserve assembly). Per the Western Riverside County RCS MSHCP Mapping Tool, the Project site resides partially within MSHCP Criteria Cells 4157, 4166, 4169, 4266, 4060, and 4067. Website: https://wrcrca.maps.arcgis.com/apps/webappviewer/index.html?id=2b9d4520bd5f4d35add35fb58808c1b7 (accessed September 9, 2025).

The MSHCP provides the mechanism for the regional conservation of habitat in western Riverside County. Because it is a permittee under the MSHCP, the City has adopted its Local Development Mitigation Fee (LDMF). Payment of LDMFs provides habitat-based mitigation within the plan area for all wildlife and plant species impacted due to the loss of suitable habitat from covered projects. Payment of the mitigation fee and compliance with all applicable requirements of the MSHCP provide full mitigation under CEQA, the National Environmental Policy Act (NEPA), the Federal Endangered Species Act (FESA), and the California Endangered Species Act (CESA) for impacts to MSHCP-covered species and habitats. The MSHCP also addresses indirect impacts through Cores and Linkages, Criteria Cells, and MSHCP fees.

Considering that conservation of biological resources is comprehensively addressed on a regional level under the MSHCP, and in tandem with the Project restoration area and site-specific mitigation identified in Section 3.4, Biological Resources, of this EIR, the permanent and irreversible changes to the natural condition of the Project site would be less than significant.

4.1.5 Hazards and Hazardous Materials

Industrial uses operated on the site may include the use and disposal of hazardous waste along with limited use of pesticide and herbicides for landscape maintenance. Vehicles accessing the uses on site would contain oil and fuel to power their engines, which could have the potential to result in minor releases of such substances through drips or leaks in parking areas. Transport truck traffic to and from the site may also contribute to minor releases of oil and fuel in the loading dock areas in addition to the parking areas. The proposed warehouse uses are not anticipated to generate or use major hazardous materials, or create unusually high quantities of hazardous waste, and they would be required to prepare a Hazardous Materials Business Plan (as appropriate). Because no such hazards currently exist on site, the Project as proposed would result in the potential for accidental hazardous material release/upset, but it would not constitute a significant impact.

4.1.6 Wildfire

As discussed in Chapter 2.0 of this EIR, the Project site is located in a wildland-urban interface (WUI) setting, or a zone of transition between unoccupied land and human development. Further, the Project site is within an area statutorily designated by the California Department of Forestry and Fire Protection (CAL FIRE) as a Very High Fire Hazard Severity Zone (VHFHSZ) within a Local Responsibility Area (LRA).[5] Based on the Project site's fire environment, topography, climate, fuels (vegetation), and fire history, it is possible that a wildfire event could occur on or near the site.

The proposed Project would result in the development of the Onsite Development Area with two ignition-resistant warehouse buildings and associated hardscaping. The areas that are not hardscaped within the Onsite Development Area (e.g., irrigated and managed landscaping) would be located adjacent to low-flammability parking lots, roadways, and cement structures, thereby limiting ignition potential. Further, the proposed Project would include a variety of Project design features to reduce the potential for wildfire spread on the Project site, including Type 1 (Fire Resistive) tilt-up

[5] California Department of Forestry and Fire Protection. 2025. Fire Hazard Severity Zones. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed June 24, 2025).

construction materials, installation of a National Fire Protection Association (NFPA) 13 commercial interior fire sprinkler system, and minimum 100-foot on-site and off-site equivalent fuel modification to be maintained on a yearly basis. Further, the proposed Project would also provide funding to support the provision of additional fire response infrastructure pursuant to the Fire Facilities Fee requirement set forth in Section 16.74.049 of the City of Lake Elsinore Municipal Code, thereby fulfilling its requirement to fund its share of improvements and mitigating its potential impact related to fire protection facilities. The proposed Project would also adhere to additional fire protection measures identified in the *Fire Protection Plan*[6] as well as evacuation education and preparedness strategies consistent with the "Ready, Set, Go!"[7] approach adopted by CAL FIRE.

With adherence to applicable regulations, and in tandem with the site-specific mitigation identified in Section 3.20, Wildfire, of this EIR, the potential for exposure of people or structures to wildfire hazards through the lifetime of the Project would not constitute a significant impact.

4.2 GROWTH-INDUCING IMPACTS

Pursuant to Sections 15126(d) and 15126.2(e) of the *CEQA Guidelines,* an EIR must discuss the ways in which a proposed project could foster economic or population growth, construction of additional housing (either directly or indirectly) in the surrounding environment, or removal of obstacles to population growth. Growth-inducing effects are not to be viewed as necessarily beneficial, detrimental, or of little significance to the environment. This discussion is included in this EIR to provide additional information on ways in which the Project could contribute to significant changes in the environment beyond the direct consequences of developing the Project described in earlier chapters of the EIR. To address this issue, potential growth-inducing effects are assessed by determining if the Project would: (1) remove obstacles to population growth through the construction or extension of major otherwise unplanned-for infrastructure facilities that do not presently exist in the vicinity of the Project site (e.g., a major expansion of roadway infrastructure); (2) foster economic growth, thereby requiring the construction of new facilities, which could cause significant environmental effects that could significantly affect the environment; or (3) include Project characteristics that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

4.2.1 Remove Obstacles to or Otherwise Foster Growth (Construction or Extension of Infrastructure)

The Onsite Development Area would have primary access off Pierce Street and Baker Street via Nichols Road via four new driveways. Three driveways would be constructed along Baker Street, and one driveway would be constructed along Pierce Street. The Project also includes 37.86 acres of off-site improvements on Baker Street and Pierce Street that include build out of the General Plan roadway designation and capacity and the realignment of Baker Street to Nichols Road.

The existing Nichols Lift Station, located at the intersection of Nichols Road and Pierce Street, has already been planned for expansion along with build out of the Project vicinity. The timing of the

[6] Dudek. 2025. *Fire Protection Plan Baker Industrial Project*. September (Appendix P).
[7] California Department of Forestry and Fire Protection. Ready, Set, Go! https://readyforwildfire.org/prepare-for-wildfire/ (accessed May 19, 2025).

expansion is based on development of areas outside of the Project site. Should development of the Project occur prior to build out of the Nichols Lift Station and additional capacity be required, the Nichols Lift Station would be upgraded to accommodate the Project's wastewater flows. The lift station would be improved within the existing footprint of the current lift station and within the existing public ROW. Improvements would include the installation of three pumps, each rated for 1,100 gallons per minute, and the construction of an associated above-grade control structure.

It is possible the proposed improvements to Nichols Road, Baker Street, and Pierce Street, as well as to the existing Nichols Lift Station, could support population growth by providing upgraded facilities capable of supporting development. However, these improvements are already planned for and are conditioned upon the Project, in accordance with the City's Collector and Secondary roadway designations in the General Plan Circulation Element and in anticipation of projected growth through General Plan build out, to ensure that necessary services and infrastructure sufficient to serve the planned growth exist.

The Project site is located in an urban area that is currently served by existing utilities, including water, sanitary sewer, storm drainage, electricity, and telecommunications infrastructure. The proposed Project includes installation of new water, sewer, and electric lines to interconnect to the existing water, sewer, and electricity infrastructure to serve the Onsite Development Area. Potable water and wastewater services to the Project site would be provided by the Elsinore Valley Municipal Water District (EVMWD). The proposed Project would include the installation of a new EVMWD-operated 36-inch water transmission line in the Nichols Road and Baker Street ROWs to connect the Onsite Development Area to the existing 20-inch water line in Baker Street that supplies the Baker Reservoir. The proposed Project would also include the installation of a new EVMWD-operated 8-inch sewer line in the Baker Street ROW to connect the Onsite Development Area to the existing 15-inch sewer line at the intersection of Baker Street and Pierce Street, where it would convey wastewater to the existing Nichols Lift Station. Electric service would be provided by SCE via connections to the existing electricity infrastructure at the nearby Fogarty Substation via a distribution circuit extension along Terra Cotta Road, Nichols Road, and Pierce Street.

These proposed infrastructure improvements would connect to existing infrastructure surrounding the Project site. The goal of the City's General Plan is to provide sufficient and appropriately located public facilities to serve the needs of the City's residents, businesses, and visitors. The infrastructure that would be constructed in connection with the proposed Project is either already planned for by the City or needed for planned growth as described in the City's General Plan and the aforementioned plans.

The Project does not require off-site construction or extension of infrastructure that was not already anticipated by the City. For example, the stated roadway improvements would be constructed along the Project perimeter to provide access to the site and are planned to conform to adopted City General Plan Circulation Element standards and accommodate the existing and future development already envisioned by the General Plan. Therefore, the improvement and/or installation of these roadways would not promote or facilitate growth not previously forecast by the City and would not expand the scope of or change the designations of those roadways beyond those previously identified by the City. Similarly, the existing Nichols Lift Station has already been planned for expansion by the City along with build out of the Project vicinity. The installation of utilities is to connect the Project

site with existing utilities abutting the site would not extend infrastructure or promote growth (directly or indirectly) beyond that already accounted for by the City.

Therefore, development of the proposed Project would occur in a manner that is expected by the City's growth forecasts, General Plan build out, and planned improvements, and would not remove obstacles to or otherwise foster substantial unplanned population growth.

4.2.2 Foster Economic Growth

In its existing condition, the Project site consists of undeveloped land and public road ROWs. As such, the site does not currently generate substantial tax revenue for the City. Upon implementation of the Project, up to 1,000,451 square feet of warehouse uses would be developed, and the Project is anticipated to provide approximately 483 permanent jobs.[8] The proposed improvements would substantially increase the assessed value of the site and satisfy Project objectives to "[e]mbrace flexible and diverse industrial land uses that foster economic development opportunities for the City of Lake Elsinore and surrounding areas near I-15," "[p]rovide local, well-paying jobs to residents that may otherwise travel out of the region for employment," and "[p]rovide new economic development that is consistent with the City's General Plan."

In addition to the long-term employment that the Project would provide at build out, workers would be employed during the anticipated 17 months required for construction of the proposed warehouses and associated site improvements. Construction workers are anticipated to be drawn from the existing regional work force, and construction of the proposed Project would not be growth inducing from an employment standpoint. As described above, the proposed Project would generate new permanent employment opportunities. Therefore, the Project would foster and facilitate economic growth as anticipated by the City through its designation of the site for Limited Industrial development in its General Plan.

4.2.3 Involve Characteristics That May Encourage and Facilitate Other Activities That Could Significantly Affect the Environment

As detailed in Section 3.14, Population and Housing, of this EIR, the Project is anticipated to provide approximately 483 jobs. The Project is consistent with the potential growth envisioned under the City's General Plan Limited Industrial land use designation, which provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses" at a maximum floor area ratio (FAR) of 0.45. Given City and County unemployment rates, it is anticipated that new employment opportunities created by the Project would be filled by persons already living in the city or nearby jurisdictions. The addition of these employees would also improve the City's jobs-to-housing ratio and help the City meet its jobs-to-housing ratio goal of 0.95:1 (or one job for every 1.05 households) by the year 2030 under Policy 1.8 of Chapter 2.0 - Community Form (Section 2.3 – Land Use) of the General Plan. Growth under the proposed Project is therefore consistent with the applicable land use plans, which have anticipated increases in demand for goods and services as a result of planned growth.

[8] Development Planning & Financing Group. 2024. *Baker and Pierce Street Development – Executive Summary of Economic Benefit Analysis, Riverside Legacy IV Nichols Road, LLC.* January.

As stated in Section 3.15, Public Services, of this EIR, Chapter 16.74 of the Lake Elsinore Municipal Code sets forth development fees for the purpose of defraying the costs of public expenditures for capital improvements related to the public facilities that would serve each proposed development. Because the proposed Project would fund its share of development fees as required under Chapter 16.74, the Project would fulfill its requirement to offset the costs of new or improved facilities or increased personnel or equipment that could be required to maintain acceptable service ratios, response times, and other performance objectives for these services within the city and the Project site. It is anticipated that the payment of these fees by the Project Applicant would appropriately address any proportional increase in public services and infrastructure resulting from development of the Project.

The infrastructure facilities described above are either sized specifically for the proposed Project or already planned for by the City in its General Plan or in connection with build out of the Project site vicinity. The Project does not require construction of new community services facilities to serve it. Because the jobs created by the Project would serve to improve the jobs-housing balance by creating job opportunities in Lake Elsinore, the proposed Project would not induce substantial unplanned population growth in the area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure). Accordingly, the Project would not facilitate unplanned growth that could significantly affect the environment.

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5.0 ALTERNATIVES

In accordance with the California Environmental Quality Act (CEQA) and the *CEQA Guidelines* (Section 15126.6), an Environmental Impact Report (EIR) must describe a reasonable range of alternatives to the Project, or to the location of the Project, that could feasibly attain most of the Project's basic objectives while avoiding or substantially lessening any of the significantly adverse environmental effects of the Project and evaluate the comparable merits of the alternatives. An EIR does not need to consider every conceivable alternative to a project; rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives that are infeasible.

As an EIR identifies ways to mitigate or avoid significant effects that a project may have on the environment, the discussion of alternatives should focus on alternatives to the Project or its location that are capable of avoiding or substantially lessening significant effects of the Project. The EIR needs to include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project. If an alternative would cause one or more significant effects in addition to those that would be caused by the Project, the significant effects of the alternative should be discussed but in less detail than the significant effects of the Project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative" (*CEQA Guidelines* Section 15126.6.)

In selecting project alternatives for analysis, the alternatives must be feasible. *CEQA Guidelines* Section 15126.6(f)(1) indicates that among the factors that may be considered when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

This chapter begins with an overview of the Baker Street Warehouse Project ("proposed Project" or "Project") and its significant and unavoidable effects, followed by a summary of the proposed Project alternatives considered for evaluation, including those potential alternatives that were considered but rejected from further analysis. Each alternative selected for analysis is then fully described and evaluated for potential environmental effects as compared to the proposed Project. The chapter concludes with identification of the environmentally superior alternative. Table 5.F: Proposed Project and Project Alternatives Impact Comparison, provided at the end of this chapter, provides a comparison summary of the proposed Project's impacts to each of the identified alternatives fully evaluated in this chapter.

5.1 OVERVIEW OF PROPOSED PROJECT AND ALTERNATIVES

This section provides an overview of the proposed Project and its objectives, followed by a summary of the significant and unavoidable impacts identified for the proposed Project and a description of the various alternatives evaluated in this EIR. Refer to Chapter 2.0 for a complete description of the

proposed Project and to Chapters 3.0 and 4.0 for a complete discussion of the environmental impacts that would occur with Project implementation.

5.1.1 Project Summary

As described in detail in Chapter 2.0, Project Description, the Project site is situated in the northwestern portion of the city of Lake Elsinore on 140.04 gross acres. The Project Applicant (Riverside Legacy IV Nichols Road, LLC) seeks to entitle and permit development of the Project site with two warehouses totaling 1,000,451 square feet on 65.81 acres; implement 37.86 acres of off-site improvements; dedicate 33.65 acres as a natural restoration area; and provide a 2.72-acre construction/improvements buffer between Baker Street and the restoration area, as summarized below (refer to Figure 2-3 in Chapter 3 of this Draft EIR).

- **Onsite Development Area – 65.81 acres**
    - Development of (1) a 212,028-square-foot warehouse (Building 1) with a 5,000-square-foot ground-level office space and a 5,000-square-foot office mezzanine, and (2) a 788,423-square-foot warehouse (Building 2) with a 10,000-square-foot ground-level office space and a 10,000-square-foot office mezzanine. Both buildings are proposed to be single-story with a maximum building height of 50 feet. The development also includes approximately 466 vehicle parking stalls and approximately 391 trailer parking stalls. The proposed warehouses are designed as high-cube buildings with the flexibility to accommodate up to 10 percent manufacturing and 10 percent cold storage uses.
    - On-site access to the development would be accessible via four new driveways: three proposed along Baker Street and one proposed along Pierce Street. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed at the rear of Building 2 that would extend to Building 1 for access to Pierce Street.
- **Offsite Improvement Area – 37.86 acres**
    - Right-of-way (ROW) improvements on Baker Street and Pierce Street, the realignment of Baker Street to Nichols Road, and utility improvements along public ROWs. Proposed off-site improvements would include full build out of Baker Street and Pierce Street, consistent with the General Plan Circulation Element; new pavement, new sidewalks, and new parkways; and extensions of dry and wet utility infrastructure for interconnection with the proposed warehouse buildings.
- **Restoration Area – 33.65 acres**
    - To be used for future conservation and restoration activities.
- **Construction/Improvements Buffer – 2.72 acres**
    - Land between Baker Street and the proposed Restoration Area to serve as a disturbance buffer to ensure that ROW improvements would not encroach into the Restoration Area.

Requested Project entitlements include the following applications: a Zone Change to amend the zoning of the Limited Manufacturing (M-1) portion of the site to General Manufacturing (M-2) for zoning consistency, Industrial Design Review, Tentative Parcel Map to merge the 10 existing parcels into 2 parcels, Conditional Use Permit for M-2 uses within 300 feet of a residential district, Conditional Use Permit to exceed the 45-foot maximum building height in the M-2 zone, and actions by the City of Lake Elsinore (City) (e.g., grading permit, off-site street and utility permits, and building permit). Individual Project components are summarized below.

5.1.1.1 Tentative Parcel Map No. 38812

A Tentative Parcel Map (TPM) is proposed to consolidate the 10 parcels composing the 65.81-acre Onsite Development Area (APNs 378-020-014, -015, -016, -028, -029, -030, -031, -036, -037, and -048) into two parcels.

5.1.1.2 Building Program and Use

The proposed Project would include the construction of two warehouses totaling 1,000,451 square feet on 65.81 acres. The proposed warehouses are designed as high-cube buildings with the flexibility to accommodate up to 10 percent manufacturing and 10 percent cold-storage uses.

Building 1 would be located at the northwestern end of the Onsite Development Area and would include 212,028 square feet of warehouse uses, which includes approximately 5,000 square feet of office space on the ground floor, a 5,000-square-foot mezzanine, and 23 dock doors along the southwest side of the building. Building 1 would be a maximum of 46 feet in height. Building 2 would be located at the southeastern end of the Onsite Development Area and would include 788,423 square feet of warehouse uses, which includes approximately 10,000 square feet of office space on the ground floor, a 10,000-square-foot mezzanine, and 110 dock doors along the northeast side of the building. Building 2 would be a maximum of 50 feet in height.

The ultimate end-user has not been identified at this time; therefore, specific details about the future operation of the warehouse facility are not currently available. As such, the Project Applicant has requested approval for the future warehouse to operate 24 hours per day, 7 days per week, depending on business/operational needs. Accordingly, the analysis in this EIR assumes this level of activity.

5.1.1.3 Landscaping

A combination of drought-tolerant plant material, including evergreen and deciduous trees, low shrubs, and various groundcovers, would be installed throughout the Project site pursuant to the City's Municipal Code requirements. Landscaping would include accent trees, shrubs, and groundcover installed at key corners and driveway entries. Project landscaping would be designed to screen the proposed buildings, parking areas, loading dock activities, and any truck traffic passing through the Project site. The Project would also incorporate standard streetscape landscaping along Project roadways that would meet the City's landscaping requirements to provide buffering between the on-site warehouse uses and adjacent off-site uses.

5.1.1.4 Circulation

The proposed development area would have primary access off Pierce Street and Baker Street via Nichols Road. The warehouse area would be accessible via four new driveways. Three driveways would be constructed along Baker Street, and one driveway would be along Pierce Street. Building 1 would be accessible via one passenger vehicle driveway along Pierce Street and one 53-foot truck access driveway along Baker Street. Building 2 would be accessible via two 50-foot driveways along Baker Street that would be used by passenger vehicles and trucks. In addition, the two buildings would be accessible internally under a reciprocal access agreement via a drive aisle proposed behind the rear of Building 2 that would extend to Building 1 for access to Pierce Street. The reciprocal access agreement would largely be intended to provide a secondary point of emergency access for Building 2.

The proposed Project also includes 37.86 acres of off-site improvements on Baker Street and Pierce Street and includes the realignment of Baker Street to Nichols Road. The proposed Project would dedicate 4 feet of ROW on each side of Baker Street to meet the ultimate 68-foot ROW required by the City's Collector roadway designation in the General Plan Circulation Element. Baker Street would be extended to terminate at Nichols Road for a direct connection and new intersection with Nichols Road and would be improved with a 6-foot-wide sidewalk within a 10-foot parkway on the southwest side of the street, as well as a 6-inch curb and gutter and 24 feet of pavement from the centerline to lip-of-gutter on each side of the street for approximately 0.8 mile from Nichols Road toward the southeast through the Project site. Baker Street would be elevated an average of 5 feet above its existing elevations along the proposed segment to be improved to support drainage conveyance and flood protection of public ROW, and the northeast parkway of Baker Street would slope down to discharge to the northerly properties.

Pierce Street would be improved to its ultimate 60-foot full-width ROW per the City's General Plan Circulation Element standard for a Local Street with a 6-inch curb, standard gutter, 6-foot-wide sidewalk within an overall 10-foot parkway, and 20 feet of pavement from centerline to lip-of-gutter on each side of the street from Nichols Road southwest past the project frontage to connect to Hoff Avenue, creating a second means of emergency access. The section of Pierce Street from the project frontage to Hoff Road would be paved within the existing ROW, creating a 24-foot-wide roadway along this segment. All street improvements would be constructed consistent with City standards and regulations.

The 2.72-acre Construction/Improvements Buffer would be located within the Project site between the Baker Street ROW improvements and the Restoration Area. The Construction Buffer is included as part of the Project to ensure that any disturbance adjacent to the ROW improvements would not encroach onto the Restoration Area. This Construction Buffer would be a separate parcel from the Restoration Area.

5.1.1.5 Restoration Area

Opposite of the Onsite Development Area and Construction/Improvements Buffer, on the north side of Baker Street, 33.65 acres of the Project site would be designated for future conservation efforts dedicated to habitat restoration. The Restoration Area is established to contribute to the Multiple Species Habitat Conservation Plan (MSHCP) Reserve and is bordered by Baker Street to the south, Pierce Street and Nichols Street to the west, and Collier Avenue to the northeast. The Project Applicant

placed the lands into conservation with the RCA prior to completion of the Joint Project Review (JPR). Several types of mitigation are proposed within with the Restoration Area, including San Diego ambrosia (*Ambrosia pumila*) translocation, vernal pool expansion/restoration, and mitigation for other MSHCP plants, including Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*). If the long-term management of these mitigation areas exceeds that which the RCA receives funding for through the MSHCP, the Project Applicant would provide an endowment to fund supplemental management requirements.

5.1.1.6 Drainage

The proposed Project includes the installation of two modular wetlands between the two proposed warehouse buildings and two modular wetlands near the southern end of Building 2. Two corrugated metal pipe (CMP) detention systems would also be located between the two proposed buildings to collect and store stormwater runoff before treating and discharging the runoff at a controlled rate that is equal to or below the pre-development discharge rate per National Pollutant Discharge Elimination System (NPDES) requirements.

Proposed on-site stormwater conveyance infrastructure would include 24-inch storm drain lines that would collect stormwater and convey runoff to the CMP detention systems and modular wetlands before discharging to the Restoration Area northeast of Baker Street. The proposed Project would also include the installation of two 48-inch storm drain lines to convey off-site stormwater runoff from properties southwest of the Project site across the Project site before discharging to the Restoration Area northeast of Baker Street. Rip rap wingwalls would be installed at the discharge points to prevent soil erosion from stormwater flows.

Along the northern edge of Baker Street, a graded and landscaped slope would daylight to existing ground within the parcels north of the existing Baker Street ROW. The proposed slope would provide areas to construct storm drain outlets that will convey historical storm flows to existing flow lines and ultimately into the Restoration Area in the northern portion of the Project site. The storm outlets would include energy dissipation improvements to control the stormwater outlet depth and velocity to mimic existing conditions.

5.1.1.7 Utilities

The Project site is located in an urbanized area that is currently served by existing utilities, including water, sanitary sewer, storm drainage, electricity, natural gas, and telecommunications infrastructure. The proposed Project would interconnect to these surrounding utilities through improvements to on-site gas, electric, telecommunications, water, sewer, and storm drain facilities.

5.1.2 Project Objectives

The following objectives have been identified for the proposed Project relative to the planning and CEQA processes:

1. Embrace flexible and diverse industrial land uses that foster economic development opportunities for the city of Lake Elsinore and surrounding areas near Interstate (I-)15.

2. Provide local, well-paying jobs to residents that may otherwise travel out of the region for employment.

3. Provide new economic development that is consistent with the City's General Plan.

4. Facilitate the construction of utilities, roads, and other major infrastructure that are sufficiently sized to adequately serve the Project site and vicinity, as planned by the City's General Plan.

5. Enhance streetscapes and provide buffers between the planned land uses.

6. Provide for the conservation and restoration of over 33 acres of land.

7. Incorporate "green" and sustainable practices, as practicable, in developing buildings and infrastructure.

8. Maximize the use of native plant materials/species in the Project landscaping, especially in areas located in proximity to preserved native habitat.

5.1.3 Significant and Unavoidable Impacts

The intent of an alternatives analysis is to avoid or substantially lessen the significant and unavoidable impacts identified for the proposed Project, which are listed in Table 5.A: Significant and Unavoidable Project Impacts, below. Refer to Chapter 3.0 for additional discussion.

Table 5.A: Significant and Unavoidable Project Impacts

Topic/EIR Section	Impact	Details of Impact
Air Quality	The Project would conflict with the South Coast Air Quality Management District (SCAQMD) 2022 Air Quality Management Plan (AQMP).	Implementation of the proposed Project would have the potential to conflict or obstruct implementation of applicable air quality plans because the proposed Project would result in significant and unavoidable long-term operational pollutant emissions of nitrogen oxides (NO_X) despite the incorporation of **Project Design Features (PDFs) AQ-1** through **AQ-5** and **Mitigation Measures (MMs) AQ-1** through **AQ-10**.
Air Quality	Implementation of the proposed Project would result in a cumulatively considerable net increase of criteria pollutants for which the Project region is in nonattainment under an applicable federal or State ambient air quality standard.	Emissions associated with long-term operation of the proposed Project would exceed established SCAQMD thresholds. Despite the incorporation of **PDFs AQ-1** through **AQ-5** and **MMs AQ-1** through **AQ-10,** operation of the proposed Project would result in significant and unavoidable impacts related to daily emissions of NO_X.
Air Quality	Implementation of the proposed Project would have a cumulatively considerable impact to air quality.	The Project's long-term operational emissions would exceed SCAQMD's criteria pollutant thresholds for NO_X. Although **PDFs AQ-1** through **AQ-5** and **MMs AQ-1** through **AQ-10** would reduce emissions to the extent feasible, Project emissions would remain significant and unavoidable. Therefore, the Project's operations would result in a significant and unavoidable cumulative increase in long-term regional emissions.

Table 5.A: Significant and Unavoidable Project Impacts

Topic/EIR Section	Impact	Details of Impact
Greenhouse Gas Emissions	Implementation of the proposed Project would generate greenhouse gas emissions that may have a significant impact on the environment.	Project-related greenhouse gas emissions would exceed the City of Lake Elsinore's (City) 3,000 metric tons (MT) of carbon dioxide equivalent (CO_2e) per year threshold. While the implementation of **PDFs AQ-1** through **AQ-5, MMs AQ-1** through **AQ-6, MMs GHG-1** through **GHG-3**, and the regulations implemented by the United States Environmental Protection Agency (USEPA) and California Air Resources Board (CARB) to improve truck efficiency would significantly reduce GHG emissions, the majority of the GHG emissions generated by the Project would be associated with passenger cars and trucks. Thus, no additional feasible measures are available that would further reduce GHG emissions because neither the Project Applicant nor the City has regulatory authority to control tailpipe emissions.
Greenhouse Gas Emissions	The Project may conflict with plans that have been adopted for the purpose of reducing the emission of greenhouse gases.	Although the proposed Project would be consistent with the applicable measures and goals from the 2022 Scoping Plan, the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City's Climate Action Plan (CAP), the proposed Project would result in a significant and unavoidable impact because the Project's operational greenhouse gas emissions would exceed the City's threshold of 3,000 MT CO_2e per year despite implementing PDFs and all feasible mitigation. Thus, the Project would not comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in the 2022 Scoping Plan, Executive Order B-30-15, and Assembly Bill 197 and would not be consistent with applicable State plans and programs designed to reduce greenhouse gas emissions.
Greenhouse Gas Emissions	The Project would result in a cumulatively considerable impact from greenhouse gas emissions.	Since greenhouse gas is a global issue and the Project's emissions represent a negligible amount comparative to global and State emissions, it is unlikely that the proposed Project would generate enough greenhouse gas emissions to influence greenhouse gas emissions on its own; however, because Project-related CO_2e emissions would exceed the City's preferred thresholds even with implementation of **PDFs AQ-1** through **AQ-5, MMs AQ-1** through **AQ-6, MMs GHG-1** through **GHG-3**, the proposed Project would have a significant contribution to cumulatively considerable greenhouse gas emission impacts.

Source: Baker Street Warehouse Project Draft Environmental Impact Report, Sections 3.3, Air Quality, and 3.8, Greenhouse Gas Emissions.

5.1.4 Summary of Project Alternatives

The purpose of this discussion of alternatives to the proposed Project is to enable decision makers to consider how alternatives of the proposed Project may reduce or avoid the proposed Project's impact on the physical environment. As appropriate, the analysis in this chapter provides either a quantitative or qualitative evaluation of the environmental impacts that could be associated with each alternative and compares those potential impacts to those identified for the proposed Project as described in Chapter 3.0 of this EIR. Table 5.F (provided later in this chapter) summarizes the impacts of the proposed Project and compares those impacts to those that would be associated with each alternative.

Based on the goal of analyzing feasible alternatives that would feasibly attain most of the basic Project objectives but would avoid or substantially lessen any of the proposed Project's potentially significant impacts, the following alternatives to the proposed Project were selected for analysis:

- **Alternative 1: No Project/No Development Alternative.** This alternative assumes that the 140.04-acre Project site would remain in the condition that existed at the time the Notice of Preparation (NOP) was published (July 15, 2024), which consists of undeveloped land and public road ROWs. Refer to Section 5.3 for a complete description and evaluation of this alternative.

- **Alternative 2: No Project/Build Out of Existing Land Use Alternative.** This alternative assumes the Project site would be developed consistent with the existing General Plan Land Use Designation of Limited Industrial and Floodway, but as an industrial park instead of an industrial warehouse development. According to the General Plan, the Limited Industrial Land Use designation provides "for industrial parks, warehouses, manufacturing, research and development, public and quasi-public uses, and similar and compatible uses" at a maximum floor area ratio (FAR) of 0.45. This alternative assumes that the entire 65.81-acre Onsite Development Area designated as Limited Industrial would be developed as an industrial park. This alternative would not require a General Plan Amendment, but it would require a zone change to make the entire site consistent with the M-2 zoning, similar to the proposed Project. This alternative would consist of an approximately 1,290,008-square-foot industrial park development with parking, landscaping, lighting, and an internal roadway network. This alternative would also include the 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project.

- **Alternative 3: Reduced Project Alternative.** This alternative consists of developing the Project site in a manner similar to the proposed Project, but with a 50 percent reduction in square footage and operational intensity. Specifically, this alternative would result in development of a single warehouse building totaling 500,225 square feet. Development under this alternative would reduce the total warehouse square footage on the Project site by 500,226 square feet, which is approximately 50 percent. This alternative would also include the 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project. The reduced square footage would allow for increased setbacks, landscaping, passenger vehicle parking, and truck parking. Overall, the areas planned for development under this alternative, including on- and off-site areas, would be the same as for development of the proposed Project.

The three alternatives identified above are discussed in greater detail in Sections 5.3, 5.4, and 5.5, below. The purpose of this discussion of alternatives is to enable decision makers to consider how alternatives to the proposed Project may substantially lessen or avoid the proposed Project's impacts on the physical environment.

In the event City decision makers were to decide to move forward with any of the alternatives identified in this chapter, additional site planning and design work and analysis would be required for the environmental impacts associated with the alternative, and specific mitigation measures for each potentially significant impact would need to be developed and considered.

In addition, *CEQA Guidelines* Section 15126.6(c) requires an EIR to identify any alternatives considered for analysis but dismissed as infeasible. These rejected alternatives are described in Section 5.2, below.

5.2 ALTERNATIVES CONSIDERED BUT NOT SELECTED FOR FURTHER ANALYSIS

In accordance with Section 15126.6(c) of the *CEQA Guidelines,* an EIR should identify alternatives considered for analysis but rejected as infeasible and briefly explain the reasons for their elimination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR is failure to meet most of the basic Project objectives, infeasibility, or inability to avoid or substantially reduce significant environmental impacts. Alternatives that have been initially considered and rejected as infeasible include the following, which have been rejected, as detailed below, either because they would create new or more severe impacts compared to the proposed Project, are repetitive of other alternatives, would not meet the Project objectives and requirements, or are otherwise considered infeasible.

5.2.1 Alternative Site Alternative

Regarding alternative locations, per CEQA,[1] the first step is to determine whether any of the significant effects identified for the proposed Project (see Table 5.A) would be avoided or substantially lessened. Only locations that would avoid or substantially lessen any of the significant effects need be considered. Reasons for determining that no feasible alternative locations exist must be disclosed in the EIR.

Generally, any development of the size and type proposed by the proposed Project would have substantially the same environmental effect regardless of where it was located in the city. The Project site consists of 140.04 contiguous acres under a single ownership, with 65.81 acres to be developed. Based on a review of available sites for sale and the City's General Plan land use map, there are no other available, undeveloped properties of similar size (65.81 developable acres) that are zoned for industrial uses, and there are no suitable sites within the control of the Project Applicant. In addition, in the event land could be purchased of suitable size, the proposed Project would have the same potential impacts to air quality, biological resources, cultural resources, greenhouse gas (GHG) emissions, paleontological resources, and tribal cultural resources. Moreover, other possible sites may not be located in proximity to I-15, which is an established highway-level transportation route. Therefore, analysis of an alternative site for the proposed Project is neither meaningful nor necessary, because the impacts and need for mitigation resulting from the proposed Project would not be avoided or substantially lessened by its implementation. In addition, it is unlikely that development on another parcel would meet the Project's objective of providing habitat conservation of over 33 acres of land. Given these reasons, it would be infeasible to develop and operate the proposed Project on an alternate site. Therefore, the Alternative Site Alternative was rejected from further consideration.

5.2.2 Business Park Alternative

A Business Park Alternative was also considered but rejected from further discussion. This alternative would develop the Project site in a manner similar to the proposed Project, but with business park uses instead of an industrial warehouse development. As such, this alternative assumed 1,290,008 square feet of business park uses on 65.81 acres of the Project site. Business park uses generally include a mix of research and development (R&D), light manufacturing, warehousing, distribution,

[1] *CEQA Guidelines* Section 15126.6(f)(2).

offices, and support services such as cafeterias or small-scale retail. This alternative would also include the 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project.

According to the Institute of Transportation Engineers (ITE) *Trip Generation Manual,* 11th Edition, business park uses are associated with a higher average daily trip rate compared to the manufacturing and cold-storage uses proposed as part of the Project. However, unlike the proposed Project, ITE trip generation rates for business park uses do not include freight trucks. Trip generation rates for the Business Park Alternative were determined using the ITE Trip Generation Manual, 11th Edition, Land Use Code 770 – Business Park. As shown in Table 5.B: Business Park Alternative Trip Generation, the Business Park Alternative is estimated to generate approximately 16,048 daily trips, 1,742 a.m. (1,481 inbound and 261 outbound) peak-hour trips, and 1,574 p.m. (409 inbound and 1,165 outbound) peak-hour trips.

Table 5.B: Business Park Alternative Trip Generation

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Trip Rates							
Business Park[1]	12.44	1.15	0.20	1.25	0.32	0.90	1.22
Business Park Alternative Trip Generation							
Business Park (1,290.00762 TSF)	16,048	1,481	261	1,742	409	1,165	1,574
Total Trip Generation	16,048	1,481	261	1,742	409	1,165	1,574

Source: EPD Solutions, Inc. (October 7, 2025).
[1] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition, 2021.* Land Use Code 157 – High-Cube Cold Storage Warehouse.
TSF = thousand square feet

As discussed in Section 3.17, Transportation, the proposed Project is estimated to generate approximately 2,384 daily trips, 167 a.m. (128 inbound and 39 outbound) peak-hour trips, and 183 p.m. (53 inbound and 130 outbound) peak-hour trips. The Project trip generation was adjusted using passenger car equivalent (PCE) factors from the Riverside County Transportation Analysis Guidelines.[2] PCE factors provide an adjustment for the increased roadway capacity utilized by truck trips due to their heavier weight, larger size, and reduced maneuverability. In terms of PCE, the proposed Project is estimated to generate approximately 3,757 daily PCE trips, 258 a.m. (197 inbound and 61 outbound) peak hour PCE trips, and 281 p.m. (81 inbound and 200 outbound) peak-hour PCE trips. In comparison, the Business Park Alternative would result in 12,291 more daily vehicle trips, including 1,484 more a.m. peak-hour trips and 1,293 more p.m. peak-hour trips.

Because the proposed Project's significant and unavoidable air quality and GHG impacts are primarily associated with vehicle emissions and implementation of the Business Park Alternative would result in more vehicle trips to and from the Project site compared to the proposed Project, the Business Park Alternative would not reduce or avoid the proposed Project's significant and unavoidable impacts. In

[2] County of Riverside. 2020. *Riverside County Transportation Analysis Guidelines.* December.

addition, unlike the proposed Project, ITE trip generation rates for business park uses do not include freight trucks, so the Business Park Alternative would not achieve the proposed Project's objectives related to providing industrial land uses that foster economic development opportunities for the city of Lake Elsinore and surrounding areas near I-15. Therefore, the Business Park Alternative was rejected from further consideration.

5.3 NO PROJECT/NO DEVELOPMENT ALTERNATIVE (ALTERNATIVE 1)

The following provides a description of the No Project/No Development Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Project/No Development Alternative to the environmental impacts associated with the proposed Project. The discussion includes a determination of whether the No Project/No Development Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed Project.

5.3.1 No Project/No Development Alternative Characteristics

The No Project/No Development Alternative assumes that the 140.04-acre Project site would remain in its current condition, which consists of undeveloped land and public road ROWs. No new building, improvements, or ground disturbance would occur. The proposed discretionary actions (e.g., Tentative Parcel Map, Design Review) would not be required.

5.3.2 Analysis of No Project/No Development Alternative

The potential impacts associated with the No Project/No Development Alternative are described below. As discussed, the No Project/No Development Alternative would avoid the significant impacts associated with the proposed Project and no mitigation measures would be required; however, none of the Project objectives would be achieved.

5.3.2.1 Aesthetics

Under this alternative, no development would occur on the Project site. Views to and through the Project site would not be affected by topographic alterations, the removal of vegetation, or the installation of buildings, signage, or Project landscaping, and views would remain unchanged. While impacts associated with the proposed Project under each CEQA threshold of significance were determined to be less than significant, in the absence of any development, **no impact** to the current aesthetic condition would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.2 Agriculture and Forestry Resources

Under this alternative, the Project site would remain undeveloped. According to the California Department of Conservation (DOC) Farmland Mapping and Monitoring Program (FMMP),[3] the majority of the Project site is designated as "Farmland of Local Importance." Portions of the Project

[3] California Department of Conservation. California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/app/ (accessed July 11, 2024).

site along the southwestern Project site boundary are designated as "Other Land" and the northeasternmost portion of Nichols Roads within the Offsite Improvements Area is designated as "Urban and Built-Up Land." As early as 1938 to circa 1962, the Project site was a rural residential property with limited agriculture activity. From 1963 to present, the Project site has had minimal to no agricultural use.[4] In the absence of any development, **no impact** related to agriculture and forestry resources would occur under this alternative. The level of impact associated with this issue would remain the same under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.3 Air Quality

In the absence of development, pollutants emitted during construction and operation of the proposed Project would not occur. The South Coast Air Basin (SCAB) is currently designated nonattainment for the federal and State standards for ozone (O_3) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$). In addition, the SCAB is in nonattainment for the particulate matter less than 10 microns in diameter (PM_{10}) standard. Under this alternative, the significant and unavoidable impacts related to the proposed Project's cumulatively considerable increase in criteria pollutants for which the SCAB is in nonattainment and the exceedance of the South Coast Air Quality Management District's (SCAQMD) significance criteria for daily emissions of nitrogen oxides (NO_X), would not occur. In the absence of any development, **no impact** related to air quality would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.4 Biological Resources

Under this alternative, the Project site would remain undeveloped. The topography of the Project site, existing vegetative cover, and on-site habitat would be maintained in its current condition. However, no restoration area would be established on the north side of Baker Street for future conservation efforts dedicated to habitat restoration. While the proposed Project includes mitigation to reduce impacts related to biological resources to a less than significant level, in the absence of any development, **no impact** to on-site biological resources would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project. However, the biological benefits of the Project would also not be achieved.

5.3.2.5 Cultural Resources

Under this alternative, the Project site would remain undeveloped. As no disturbance of the Project site would occur, there is no potential for impacts to previously identified or any as-of-yet undiscovered cultural materials that may exist at the Project site. While the proposed Project includes mitigation to reduce impacts related to cultural resources to a less than significant level, in the absence of any development, **no impact** to on-site cultural resources would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

[4] California Department of Conservation. California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/app/ (accessed July 11, 2024).

5.3.2.6 Energy

In the absence of on-site development, there would be no short-term (construction) or long-term (operation) increase in the demand for energy resources. Therefore, **no impact** related to energy resources would occur under this alternative. While the energy resource impacts of the proposed Project were determined to be less than significant, the level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.7 Geology and Soils

The geologic, soil/erosion, and paleontological resource impacts associated with the proposed Project would be reduced through compliance with standard regulatory conditions/requirements and/or mitigation measures to less than significant or would have no impact without such measures for each threshold of significance. As the Project site would remain undeveloped under this alternative, **no impact** or increased potential for damage to structures/facilities or injury to persons resulting from geologic conditions or seismic/seismic-related events would occur. Furthermore, in the absence of any disturbance to the Project site, the potential for disturbance to any potential paleontological resource that may be present on site would not occur. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.8 Greenhouse Gas Emissions

As previously stated, no construction or operational activities would occur on site, and no mobile or stationary sources of GHG emissions would be generated under this alternative. Additionally, the Project site would not generate any vehicle trips that may contribute emissions into the air basin. As no GHGs would be emitted under this alternative, the proposed Project's significant and unavoidable impacts would be eliminated and **no impact** would occur. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.9 Hazards and Hazardous Materials

Under this alternative, no construction or operational activities would occur. In the absence of development, no hazards or hazardous materials would be introduced to the Project site, no safety hazard related to an airport land use plan would be introduced to the Project site, and there would be no interference with an adopted emergency response plan or emergency evacuation plan. In addition, as no disturbance of the Project site would occur, implementation of the proposed Project would not result in a risk of release of hazardous materials due to on-site contamination. Therefore, **no impact** would occur. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.10 Hydrology and Water Quality

Under this alternative, the Project site would remain undeveloped. On-site drainages would be maintained in their current condition, and no changes in the pattern or volume of current flows would occur. In the absence of a building footprint or paved surfaces, no change in surface permeability or increased chance of polluted runoff would occur. While the proposed Project would include regulatory

compliance measures (RCMs) to reduce impacts related to local hydrology and water quality to below a significant level, retention of the Project site in its undeveloped condition would result in **no impact**. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.11 Land Use and Planning

Under this alternative, the Project site would remain undeveloped and would retain the existing General Plan Land Use and zoning designations. However, under this alternative, no off-site improvements on Baker Street and Pierce Street would occur. Baker Street would not be improved to meet the ultimate 68-foot ROW required by the City's Collector roadway designation in the General Plan Circulation Element, the new intersection design at Baker Street and Nichols Road would not be improved consistent with the ultimate build out of Nichols Road (Urban Arterial Highway – 120-foot ROW), and Pierce Street would not be improved to its ultimate 60-foot full-width ROW per the City's General Plan Circulation Element. In the absence of development, **no impact** would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project. However, the benefits related to the development of infrastructure would not be achieved.

5.3.2.12 Mineral Resources

In the absence of any development, **no impact** related to mineral resources or extraction would occur under this alternative. While the mineral resources impacts of the proposed Project were determined to be less than significant, the level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project because the No Project/No Development Alternative assumes that the 140.04-acre Project site would remain in its current condition, which consists of undeveloped land and public road ROWs. No new building, improvements, or ground disturbance would occur.

5.3.2.13 Noise

Under this alternative, the absence of construction activity would eliminate construction noise. This alternative would also not result in any vehicle trips to and from the Project site and, therefore, would not result in increased traffic noise impacts from traffic on off-site sensitive receptors. Additionally, the stationary noise sources associated with proposed industrial uses would be eliminated, reducing the ambient noise levels. As this alternative would not add noise to the existing noise environment, **no impact** would occur. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.14 Population and Housing

Under this alternative, the Project site would remain undeveloped. In the absence of development, no temporary or permanent increase in population related to new employment opportunities would occur. Generally, the City is expected to continue to add housing faster than jobs between 2019 and 2050, indicating that the City would continue to have more housing than available employment opportunities. Absent the proposed Project's 483 new jobs, the construction and operation of other residential projects in Lake Elsinore may exacerbate the existing job-housing imbalance. However, compared to the proposed Project, there would be **no impact** under this alternative. The level of

impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project. However, the jobs-to-housing benefits of the Project would not be achieved.

5.3.2.15 Public Services

In the absence of any development on the Project site, no increase in the demand for police, fire protection, school, park, or other government services and/or the need for new public-service facilities would occur and no development impact fees (DIFs) would be required. However, under this alternative, no contribution of additional funding to the City for a future fire station or other infrastructure would occur. While impacts to public services were determined to be less than significant for the proposed Project with the payment of DIFs, compared to the proposed Project, there would be **no impact** under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.16 Recreation

Under this alternative, the Project site would remain undeveloped. In the absence of development, no temporary or permanent increase in population related to new employment opportunities would occur. Therefore, no increased demand on or for park or recreation facilities would occur under this alternative and **no impact** is anticipated. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.17 Transportation

Under this alternative, the Project site would remain undeveloped. This alternative would not result in an increase in daily traffic volumes on local or regional roadways; therefore, traffic operations at intersections and on roadway segments would not be altered. In the absence of development, the 483 new job opportunities resulting from implementation of the proposed Project would not occur, which may cause persons to travel farther for employment. It is unknown if the absence of these jobs would indirectly contribute to a regional increase in VMT. While impacts associated with transportation were determined to be less than significant for the proposed Project, compared to the proposed Project, there would be **no impact** under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project. However, the benefits related to the development of roadway infrastructure would not be achieved.

5.3.2.18 Tribal Cultural Resources

Under this alternative, the Project site would remain undeveloped. As no disturbance of the Project site would occur, there is no potential for impact to previously identified or any as-of-yet undiscovered tribal cultural materials that may exist. While the proposed Project includes mitigation to reduce tribal cultural resource impacts to a less than significant level, in the absence of any on-site disturbance, **no impact** to on-site tribal cultural resources would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.2.19 Utilities and Service Systems

In the absence of any development on the Project site, no increase in demand for water or increased generation of wastewater or solid waste would occur under this alternative. No change in the capacity or functioning of the existing public utility systems would occur and, therefore, **no impact** on utilities and service systems would occur under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project. However, the benefits related to the development of utility infrastructure would not be achieved.

5.3.2.20 Wildfire

As no structures would be developed under this alternative, the retention of the Project site in its current condition would eliminate the wildland fire hazard to any on-site structure or person. While impacts related to wildfire were determined to be less than significant for the proposed Project, compared to the proposed Project, there would be **no impact** under this alternative. The level of impact associated with this issue would be reduced under the No Project/No Development Alternative compared to the proposed Project.

5.3.3 Summary of No Project/No Development Alternative

While this alternative would eliminate the significant and unavoidable impacts associated with the proposed Project, as well as those impacts determined to be less than significant, it would not meet any of the Project objectives. Since the Project site would remain in its current, underutilized condition, this alternative would not satisfy stated Project objectives, including: (1) embrace flexible and diverse industrial land uses that foster economic development opportunities for the City of Lake Elsinore and surrounding areas near I-15; (2) provide local, well-paying jobs to residents that may otherwise travel out of the region for employment; (3) provide new economic development that is consistent with the City's General Plan; (4) facilitate the construction of utilities, roads, and other major infrastructure that are sufficiently sized to adequately serve the Project site and vicinity, as planned by the City's General Plan; or (5) provide for the conservation and restoration of over 33 acres of land.

The existing land use and zoning designation for the Project site anticipates the development of the site with industrial parks, warehouses, manufacturing, R&D, public and quasi-public uses, and similar and compatible uses. Industrial development provides a significant source of local and regional jobs in the city. Additionally, due to the limited amount of land available for industrial development in the region, the city continues to attract developers seeking to build industrial land uses in the city. Therefore, it is unlikely that the Project site would remain vacant in perpetuity.

5.4 NO PROJECT/BUILDOUT OF EXISTING LAND USE ALTERNATIVE (ALTERNATIVE 2)

The following provides a description of the No Project/Buildout of Existing Land Use Alternative and its anticipated environmental impacts. The emphasis of the analysis is on comparing the anticipated environmental impacts of the No Project/Buildout of Existing Land Use Alternative to the environmental impacts associated with the proposed Project. The discussion includes a determination of whether the No Project/Buildout of Existing Land Use Alternative would reduce, eliminate, or create

new significant environmental impacts and would or would not meet the objectives of the proposed Project.

5.4.1 No Project/Buildout of Existing Land Use Alternative Characteristics

This alternative assumes the Project site would be developed consistent with the existing General Plan land use designations of Limited Industrial and Floodway. According to the General Plan, the Limited Industrial designation is for industrial parks, warehouses, manufacturing, R&D, public and quasi-public uses, and similar and compatible uses with a maximum FAR of 0.45. Under this alternative, the entire 65.81-acre Onsite Development Area designated as Limited Industrial would be developed to the maximum allowable FAR of 0.45 pursuant to the existing General Plan designation as an industrial park, consisting of an approximately 1,290,008-square-foot industrial park development with parking, landscaping, lighting, and an internal roadway network. This alternative would also include 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project. This alternative would not require a General Plan Amendment; however, it would require a zone change to make the entire site consistent with the M-2 zoning, similar to the proposed Project.

5.4.2 Analysis of No Project/Buildout of Existing Land Use Alternative (Alternative 2)

The potential impacts associated with the No Project/Buildout of Existing Land Use Alternative are described below. As discussed, the No Project/Buildout of Existing Land Use Alternative would develop the same Project site with industrial park uses at the allowable FAR that would result in a slightly larger size and scale than the proposed Project. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed Project and this alternative. It can also be assumed that alterations to topography and vegetation on the Project site would be similar for both developments. In addition, similar regulations, ordinances, standards, and policies applicable to the proposed Project would also apply to this alternative.

5.4.2.1 Aesthetics

Similar to the proposed Project, development of the No Project/Buildout of Existing Land Use Alternative would alter the existing visual condition of the Project site through the introduction of development on the currently undeveloped Project site at a slightly larger size and scale than the proposed Project. The No Project/Buildout of Existing Land Use Alternative would comply with the City's General Plan goals and policies regarding aesthetics and would be visually comparable to the proposed Project. The architectural design and landscaping of the No Project/Buildout of Existing Land Use Alternative would be subject to applicable design guidelines in the Municipal Code and landscaping plan to ensure the Project site is developed with consistent visual characteristics of the surrounding uses, similar to the proposed Project, whether a few large buildings or multiple small buildings are proposed, and it is expected that the overall visual appearance under this alternative would be similar to the proposed Project and would not represent a significant impact.

As with the proposed Project, construction of the No Project/Buildout of Existing Land Use Alternative would be required to implement **Mitigation Measure (MM) AES-1,** which would require the temporary nighttime lighting that may be used within the construction staging areas to be downward-facing and hooded. In addition, the development associated with this alternative would comply with

the City's lighting standards and requirements, as detailed in Section 17.112.040 (Lighting) and Section 17.148.110 (Lighting, Parking Requirements), of the City's Municipal Code. The No Project/Buildout of Existing Land Use Alternative would also comply with the County of Riverside's Ordinance 655 addressing nighttime light pollution and the City's "Good Neighbor Policy," as applicable, similar to the proposed Project.

As stated above, the architectural design and landscaping of the No Project/Buildout of Existing Land Use Alternative would be subject to applicable design guidelines in the Municipal Code and landscaping plan to ensure the Project site is developed with consistent visual characteristics of the surrounding uses, similar to the proposed Project, whether a few large buildings or multiple small buildings are proposed. Because the No Project/Buildout of Existing Land Use Alternative would be developed in the same location as the proposed Project, it is reasonable this alternative would have generally similar impacts on the existing visual character of the Project site, scenic views, scenic resources, and lighting. Therefore, impacts related to the aesthetic condition and visual resources would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.2 Agriculture and Forestry Resources

As the No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project, impacts to agricultural and forestry resources would be similar to those resulting from the proposed Project. Consistent with the proposed Project, **no impact** related to agriculture and forestry resources would occur under this alternative. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.3 Air Quality

The No Project/Buildout of Existing Land Use Alternative would develop the Project site with an industrial park instead of an industrial warehouse development. Overall, this alternative would consist of an approximately 1,290,008-square-foot industrial park development with parking, landscaping, lighting, and an internal roadway network. This alternative would also include the 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project.

Construction activities for the proposed Project and this alternative are expected to be similar, but with a potentially slight increase in construction duration due to the slight increase in size of this alternative. Similar to the proposed Project, during construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment are also anticipated and would include carbon monoxide (CO), NO_X, volatile organic compounds (VOCs), directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and toxic air contaminants (TACs) such as diesel exhaust particulate matter. Construction activities would include demolition, site preparation, grading, building construction, architectural coating, and paving activities. The No Project/Buildout of Existing Land Use Alternative would also include off-site/lift station improvements that would consist of grading, building construction, paving, architectural coating, linear grubbing and land clearing, linear grading and excavation, linear drainage,

utilities and sub-grade, and linear paving activities within the Offsite Improvements Area, similar to the proposed Project. As construction activities associated with the No Project/Buildout of Existing Land Use Alternative would be similar in scale as the proposed Project, construction emissions associated with the No Project/Buildout of Existing Land Use Alternative are not expected to exceed the SCAQMD's maximum daily thresholds, similar to the proposed Project, even though the duration of construction may be slightly longer. Therefore, construction of the No Project/Buildout of Existing Land Use Alternative would not result in a cumulatively considerable increase of any criteria pollutant for which the region is in nonattainment under an applicable National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS), similar to the proposed Project, and construction impacts would be **less than significant**.

Similar to the proposed Project, long-term air pollutant emission impacts from implementation of the No Project/Buildout of Existing Land Use Alternative are those associated with mobile-source emissions (e.g., vehicle and truck trips), energy-source emissions (e.g., natural gas), area-source emissions (e.g., architectural coatings and the use of landscape maintenance equipment), on-site cargo handling equipment emissions, and stationary-source emissions (use of diesel-powered emergency generators). Mobile-source emissions include VOCs and NO_X emissions that contribute to the formation of O_3. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

Similar to the proposed Project, the No Project/Buildout of Existing Land Use Alternative would generate emissions from daily operations that would include heavy-duty truck trips from operation of the industrial park. As discussed in Section 5.4.2.17, below, the No Project/Buildout of Existing Land Use Alternative would result in 1,963 more daily vehicle trips, including 272 more a.m. peak-hour trips and 256 more p.m. peak-hour trips, when compared to the proposed Project. As such, the No Project/Buildout of Existing Land Use Alternative is anticipated to result in increased generation of NO_X emissions when compared to the proposed Project. Therefore, implementation of the No Project/Buildout of Existing Land Use Alternative would continue to result in **significant and unavoidable** impacts related to a cumulatively considerable net increase of a criteria pollutant for which the region is in nonattainment under an applicable NAAQS or CAAQS, even with implementation of **MMs AQ-1** through **MM AQ-10, PDFs AQ-1** through **PDF AQ-5,** and the regulations implemented by the United States Environmental Protection Agency (USEPA) and CARB to improve truck efficiency, similar to the proposed Project.

In addition, because the No Project/Buildout of Existing Land Use Alternative would also result in significant and unavoidable long-term operational pollutant emissions even with implementation of **MMs AQ-1** through **AQ-10** and **PDFs AQ-1** through **AQ-5**, impacts associated with conflict with or obstructions of implementation of the applicable air quality plan would also be **significant and unavoidable,** similar to the proposed Project.

However, due to distance from the Project site and the nearest sensitive receptor, construction and operation of the No Project/Buildout of Existing Land Use Alternative is not expected to exceed localized SCAQMD thresholds and would not expose nearby existing residential receptors to substantial pollutant concentrations, similar to the proposed Project. Construction and operation of the No Project/Buildout of Existing Land Use Alternative would also not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people with adherence to

SCAQMD Rules 402 and 403 and Title 13, Section 2449(d)(2), of the California Code of Regulations (CCR). Impacts would be **less than significant,** similar to the proposed Project.

Under the No Project/Buildout of Existing Land Use Alternative, operational air quality impacts would be slightly greater due to the slightly larger size of this alternative and the greater number of vehicle trips to and from the Project site. Implementation of the No Project/Buildout of Existing Land Use Alternative would continue to result in **significant and unavoidable** air quality impacts, similar to the proposed Project.

5.4.2.4 Biological Resources

The No Project/Buildout of Existing Land Use Alternative would develop an industrial park on the same site as the proposed Project and would result in similar alterations to the Project site topography and vegetation. Therefore, similar to the proposed Project, development of the No Project/Buildout of Existing Land Use Alternative would result in potentially significant impacts to San Diego ambrosia, Coulter's goldfields, Crotch's bumble bee, burrowing owl, least bell's vireo, western spadefoot, and bird species. Consistent with the proposed Project, implementation of **MMs BIO-1** through **BIO-9, RCM HAZ-1** and **WQ-1** through **WQ-4** would ensure compliance with best management practices (BMPs), applicable policies, and MSHCP guidelines to protect special-status species during construction and operation and reduce impacts related to biological resources to a less than significant level under the No Project/Buildout of Existing Land Use Alternative. Consistent with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would not result in impacts to riparian habitat, sensitive natural communities, or wetlands with implementation of **MMs BIO-10** and **BIO-11,** which would mitigate impacts to the 0.50 acre of Riverine Areas and 0.17 acre associated with Vernal Pool 2 and Vernal Pool 3 off site through the purchase of mitigation credits from the Riverpark Mitigation Bank and by expanding the existing vernal pools on the opposite (northern) side from the proposed impacts, respectively. Therefore, impacts on biological resources would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.5 Cultural Resources

The No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project and would result in similar alterations to the Project site. Therefore, consistent with the proposed Project, construction of this alternative has the potential to significantly impact unidentified historic and archaeological resources during ground-disturbing activities. With implementation of **MMs CUL-1** through **CUL-7**, potentially significant impacts to historical and archaeological resources during Project construction would be reduced to **less than significant**. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.6 Energy

The No Project/Buildout of Existing Land Use Alternative would develop the Project site with an industrial park instead of an industrial warehouse development. Overall, this alternative would consist

of an approximately 1,290,008-square-foot industrial park development with parking, landscaping, lighting, and an internal roadway network.

Construction activities for the proposed Project and this alternative are expected to be similar, but with a potentially slight increase in construction duration due to the slight increase in size of this alternative. Similar to the proposed Project, construction activities would require energy associated with the manufacture and transportation of building materials, grading activities, and building construction and would require gasoline, diesel, and electricity to power construction-related equipment. As construction activities associated with the No Project/Buildout of Existing Land Use Alternative would occur over a slightly longer duration than the proposed Project, construction of the No Project/Buildout of Existing Land Use Alternative would likely require slightly increased amounts of energy than the proposed Project but would still have a negligible effect on local and regional energy supplies. Furthermore, similar to the proposed Project, impacts related to energy use during construction would be temporary and relatively small in comparison to Riverside County's overall use of the State's available energy resources. In addition, the No Project/Buildout of Existing Land Use Alternative would be required to comply with CCR Title 13, Sections 2449 and 2485, which limits idling from both on-road and off-road diesel-powered equipment and is enforced by the CARB. Therefore, construction energy impacts would be **less than significant**, similar to the proposed Project.

Similar to the proposed Project, operational energy use would be associated with natural gas use (on-site cargo handling equipment within the Onsite Development Area), electricity consumption, and fuel used for vehicle trips. In addition, the No Project/Buildout of Existing Land Use Alternative would result in energy usage associated with gasoline and diesel fuel consumed by vehicle trips, similar to the proposed Project. Operation of the No Project/Buildout of Existing Land Use Alternative may require slightly higher amounts of electricity and natural gas during operation due to the slight increase in square footage of this alternative, but the demand would remain relatively small in comparison to Riverside County's overall use of the State's available energy resources. In addition, although the No Project/Buildout of Existing Land Use Alternative would result in 1,963 more daily vehicle trips, including 272 more a.m. peak-hour trips and 256 more p.m. peak-hour trips, when compared to the proposed Project, vehicle trips associated with the alternative are not anticipated to substantially increase the annual fuel use or diesel fuel use in Riverside County. Furthermore, the No Project/Buildout of Existing Land Use Alternative would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Energy Code, similar to the proposed Project. Therefore, consistent with the proposed Project, this alternative would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy during operation, and impacts would be **less than significant**.

Under the No Project/Buildout of Existing Land Use Alternative, construction and operational energy impacts would be slightly greater than the proposed Project due to the slightly larger size of this alternative and greater number of vehicle trips to and from the Project site. Nevertheless, consistent with the proposed Project, energy impacts associated with the No Project/Buildout of Existing Land Use Alternative would remain **less than significant**.

5.4.2.7 Geology and Soils

The No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project and, therefore, would result in the same potential impacts related to geology and soils and seismic hazards as the proposed Project. Consistent with the proposed Project, compliance with the applicable provisions of the 2022 edition of the California Building Code (CBC) and the design parameters and recommendations of the site-specific Geotechnical Evaluation would be required as a condition of the grading and/or building permit, as specified in **MM GEO-1**. With implementation of **MM GEO-1**, impacts resulting from strong seismic ground shaking, seismic-related ground failure, liquefaction, landslide, unstable slopes, expansive soils, and soil collapse would be reduced to less than significant. In addition, similar to the proposed Project, the No Project/Buildout of Existing Land Use Alternative would also be required to adhere to the BMPs contained in the Stormwater Pollution Prevention Plan (SWPPP) pursuant to **RCM WQ-1** and the Water Quality Management Plan (WQMP) pursuant to **RCM WQ-3**, which would ensure appropriate measures are taken to prevent the substantial loss of topsoil and erosion from occurring during Project construction and operation.

Assuming the maximum depth of excavation during construction of this alternative would be similar to the proposed Project, this alternative has the potential to significantly impact nonrenewable paleontological resources. Consistent with the proposed Project, implementation of **MM GEO-2** would ensure that paleontological resources, if encountered during Project construction of this alternative, would be retrieved for future scientific study and protection, thereby reducing potential impacts to paleontological resources to less than significant. Therefore, impacts related to geology and soils would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.8 Greenhouse Gas Emissions

The No Project/Buildout of Existing Land Use Alternative would develop the Project site with an industrial park instead of an industrial warehouse development. Overall, this alternative would consist of an approximately 1,290,008-square-foot industrial park development with parking, landscaping, lighting, and an internal roadway network. This alternative would also include the 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project.

Construction activities for the proposed Project and this alternative are expected to be similar, but with a potentially slight increase in construction duration due to the slight increase in the size of this alternative. Similar to the proposed Project, during construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically use fossil-based fuels to operate. Similar to the proposed Project, long-term GHG emissions from the No Project/Buildout of Existing Land Use Alternative are those associated with mobile-source emissions (e.g., vehicle and truck trips), energy-source emissions (e.g., natural gas), area-source emissions (e.g., architectural coatings and the use of landscape maintenance equipment), on-site cargo handling equipment emissions, and stationary-source emissions (use of diesel-powered emergency generators). As discussed in Section 3.8, Greenhouse Gas Emissions, operation of the proposed Project would result in a significant impact related to GHG emissions, even with implementation of **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, **MMs GHG-1** through **GHG-3**,

and the regulations implemented by the USEPA and CARB to improve truck efficiency. The majority of the proposed Project's operational-source NO_X emissions are generated by passenger cars and trucks accessing the Project site. As discussed in Section 5.4.2.17, below, the No Project/Buildout of Existing Land Use Alternative would result in 1,963 more daily vehicle trips, including 272 more a.m. peak-hour trips and 256 more p.m. peak-hour trips, when compared to the proposed Project. As such, the No Project/Buildout of Existing Land Use Alternative is anticipated to result in increased GHG emissions during operation when compared to the proposed Project. Therefore, implementation of the No Project/Buildout of Existing Land Use Alternative would continue to result in **significant and unavoidable** impacts related to operational GHG emissions, even with implementation of **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3,** similar to the proposed Project.

In addition, similar to the proposed Project, although the No Project/Buildout of Existing Land Use Alternative would be consistent with the applicable measures and goals from the 2022 Scoping Plan, the 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and the City's Climate Action Plan (CAP), the alternative would result in a significant impact related to conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs because the operational GHG emissions would exceed the City's threshold of significance. As such, the No Project/Buildout of Existing Land Use Alternative would not comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in the 2022 Scoping Plan, Executive Order (EO) B-30-15, and Assembly Bill (AB) 197, and would not be consistent with applicable State plans and programs designed to reduce GHG emissions. Therefore, impacts would be **significant and unavoidable**, similar to the proposed Project.

Under the No Project/Buildout of Existing Land Use Alternative, construction and operational GHG impacts would be slightly greater than the proposed Project due to the slightly larger size of this alternative and the greater number of vehicle trips to and from the Project site. Implementation of the No Project/Buildout of Existing Land Use Alternative would continue to result in **significant and unavoidable** GHG impacts, similar to the proposed Project.

5.4.2.9 Hazards and Hazardous Materials

The No Project/Buildout of Existing Land Use Alternative would develop the same Project site with industrial park uses at a slightly larger size and scale than the proposed Project. Construction of the No Project/Buildout of Existing Land Use Alternative would be similar to construction of the proposed Project, albeit at a slightly longer duration, and would therefore result in similar impacts related to the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials during construction. Therefore, similar to the proposed Project, compliance with applicable regulatory policies and adherence to the regulatory standards included in **RCMs WQ-1** through **WQ-4** would ensure impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant. Land uses that would occur on site under the No Project/Buildout of Existing Land Use Alternative during operation have the potential to include the use and disposal of hazardous waste to the same extent as the proposed Project because the No Project/Buildout of Existing Land Use Alternative could accommodate manufacturing activities. As such, a Hazardous Materials Business Plan (HMBP) for future use of the No Project/Buildout of Existing Land Use Alternative as an industrial park could be required as codified in **RCM HAZ-1**. Furthermore,

the No Project/Buildout of Existing Land Use Alternative would also include limited use of pesticide and herbicides for landscape maintenance.

The prior use of the Onsite Development Area and vicinity for agriculture could have resulted in unknown subsurface conditions on the Project site, which could include buried pipelines or irrigation channels, septic tanks,[5] and/or other buried objects/debris that may contain asbestos or other hazardous materials. Because the No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project, the No Project/Buildout of Existing Land Use Alternative would also be required to implement **MMs HAZ-1** and **HAZ-2** to ensure any lead, asbestos, or other potentially hazardous materials from sources that include these unknown subsurface conditions are managed in accordance with applicable regulatory requirements. In addition, based on the Project site's location, impacts related to an accidental release of hazardous materials or emissions of hazardous substances within 0.25 mile of an existing or proposed school would be less than significant, similar to the proposed Project, as no existing or proposed schools exist within 0.25 mile of the Project site and no impacts related to airport hazards or being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would occur, similar to the proposed Project.

The No Project/Buildout of Existing Land Use Alternative would increase daily vehicle trips in the vicinity of the Project site and could therefore subject a greater number of people to the risks of wildfire. As with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would implement **RCM TRA-1, RCMs PS-1** and **PS-2, MM FIRE-1,** and **RCMs FIRE-1** and **FIRE-2** to reduce potential impacts related to emergency access and evacuation and fire protection. These regulatory compliance measures would be tailored specifically to the parameters of the No Project/Buildout of Existing Land Use Alternative to ensure that impacts related to emergency response/evacuation and wildfire would be **less than significant.**

Therefore, impacts related to hazards and hazardous materials would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would be slightly greater under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project but remain **less than significant**.

5.4.2.10 Hydrology and Water Quality

The No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project and would result in similar alterations to the Project site topography. Therefore, this alternative would result in similar impacts related to hydrology and water quality as the proposed Project. Similar to the proposed Project, development under this alternative would increase the amount of stormwater runoff due to the increase in the amount of impervious surface area. In addition, the No Project/Buildout of Existing Land Use Alternative would be subject to applicable City and NPDES permit requirements and would be required to adhere to **RCMs WQ-1** through **WQ-4**, including the application of construction and operational BMPs and other regulatory permits and requirements.

[5] The discovery of septic tanks or similar sewage disposal facilities and subsequent abandonment requires a permit from the Riverside County Department of Environmental Health pursuant to California Plumbing Code Section 722, which stipulates specific conditions for the safe removal of remnant sewage and componentry, backfilling, and inspection from the Riverside County Building & Safety Division.

With implementation of **RCMs WQ-1** through **WQ-4,** impacts to hydrology and water quality for both the proposed Project and the No Project/Buildout of Existing Land Use Alternative would be **less than significant**. Consistent with the proposed Project, impacts related to Project inundation and conflict with or obstruction of a water quality control plan or sustainable groundwater management plan would be **less than significant,** and no mitigation measures are required. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.11 Land Use and Planning

The No Project/Buildout of Existing Land Use Alternative assumes the Project site would be developed consistent with the existing General Plan Land Use Designation of Limited Industrial and Floodway, but as an industrial park instead of an industrial warehouse. Consistent with the proposed Project, under this alternative, the Project site would be developed in compliance with the applicable standards and guidelines established for the existing Limited Industrial General Plan Land Use Designation and the Limited Manufacturing (M-1), General Manufacturing (M-2), and Open Space/Floodway (OS) zoning designations, and would not result in significant land use impacts with implementation of project- and site-specific mitigation.

The development of the industrial park would be consistent with the relevant goals and policies of the City's General Plan through implementation of **RCM HAZ-1** to prepare an HMBP via the California Environmental Reporting System (CERS); **RCM FIRE-2,** which requires a fuel modification zone to be maintained on a regular basis to ensure efficacy pursuant to **MM FIRE-1; MM GEO-1** to ensure conformance with the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation; **RCMs WQ-1** through **WQ-4,** which require compliance with applicable NPDES permits, including the Construction General Permit, Groundwater Discharge Permit, the Riverside County Municipal Separate Storm Sewer System (MS4) Permit, and Chapter 14.08 of the City's Municipal Code; **MMs CUL-1** through **CUL-7,** which detail methods to protect any cultural, tribal cultural, or archaeological resources that may be encountered during Project construction; and **MM GEO-2** to prevent impacts on significant, nonrenewable paleontological resources and/or reduce them to less than significant with mitigation incorporated, similar to the proposed Project. In addition, several of the mitigation measures, project design features (PDFs), and RCMs prescribed for the proposed Project would apply to the No Project/Buildout of Existing Land Use Alternative and correspond to the BMPs identified in the Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act guidance, including **MMs AQ-1, AQ-3, AQ-4, AQ-5, AQ-9,** and **AQ-10**; **PDF AQ-3** through **AQ-5**; and **RCMs N-1** and **TRA-1.** Furthermore, this alternative would generally be consistent with the applicable standards of the City of Lake Elsinore's "Good Neighbor Policy" through implementation of **MM AQ-1** and **RCM N-1.** Also, impacts on candidate, sensitive, or special-status species and associated habitats would be addressed through compliance with MSHCP policies via implementation of **MMs BIO-1** through **BIO-11**, including development and implementation of a San Diego Ambrosia Translocation Plan; restoration/expansion of Coulter's goldfields habitat; conducting species-specific surveys (as appropriate) for Crotch's bumble bee, burrowing owl, least Bell's vireo, and western spadefoot; conducting worker environmental awareness trainings; erection of temporary sound barriers; and purchase of mitigation lands. Additionally, **RCMs HAZ-1** and **WQ-1** through **WQ-4** would ensure indirect effects associated with development in proximity to the MSHCP Conservation Area remain less than significant.

In addition, as the No Project/Buildout of Existing Land Use Alternative would develop the same Project site as the proposed Project, implementation of the alternative would not physically divide an established community.

Similar to the proposed Project, this alternative would result in impacts related to land use and planning that are **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.12 Mineral Resources

The No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project. Although the Project site is mapped as Mineral Resource Zone (MRZ) 3, a designation assigned to areas that contain known or inferred mineral occurrences of unknown significance designated as an area where significant mineral deposits are present, there are no records that indicate the Project site was previously used as a mineral resource recovery site or as a site occupied by mines. Furthermore, the City's General Plan does not designate the Project site as within a land use designation that allows for mineral extraction, nor does the City designate the Project site as an area held in reserve for future mining activities. Therefore, consistent with the proposed Project, implementation of the No Project/Buildout of Existing Land Use Alternative would result in **less than significant** impacts with respect to mineral resources, and no mitigation measures are required. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.13 Noise

The No Project/Buildout of Existing Land Use Alternative would develop an industrial park instead of an industrial warehouse on the same Project site as the proposed Project. As the industrial park development would be of slightly larger size and scale as the proposed Project, noise- and vibration-generating construction activities for both projects would be similar but could occur for a slightly longer duration. Consistent with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would be required to adhere to **RCM N-1**, which would limit construction activities to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays in compliance with Section 17.176.080[F] of the City's Municipal Code. With implementation of **RCM N-1**, construction noise and vibration impacts during construction of the No Project/Buildout of Existing Land Use Alternative would be **less than significant**, similar to the proposed Project.

As previously identified, the No Project/Buildout of Existing Land Use Alternative would generate more Project-generated trips than the proposed Project (1,963 more daily vehicle trips, including 272 more a.m. peak-hour trips and 256 more p.m. peak-hour trips when compared to the proposed Project). The increase in daily trips under this alternative would increase Project-related traffic noise levels. As discussed in Section 3.13, the increase in traffic noise with implementation of the proposed Project would exceed the City's ambient noise level increase threshold of 1.5 A-weighted decibels (dBA). However, because there are no noise-sensitive uses along Nichols Road between I-15 and Terra Cotta Road, proposed Project-related traffic noise would be less than significant.

The increase in traffic noise associated with the No Project/Buildout of Existing Land Use Alternative would be greater than with the proposed Project. Additionally, the majority of increased daily vehicle trips associated with this alternative would be passenger vehicle trips. Some of these trips may access the site from areas to the south and west without direct routes to I-15 and could pass by noise-sensitive uses along public roadways. However, the number of vehicle trips associated with the No Project/Buildout of Existing Land Use Alternative is not expected to increase traffic along nearby roadways to the extent it would create a perceptible increase in traffic noise. Accordingly, traffic noise impacts would be less than significant. Therefore, while slightly increased compared to the proposed Project, noise impacts associated with operation of the No Project/Buildout of Existing Land Use Alternative would be **less than significant,** and no mitigation measures are required, similar to the proposed Project.

The Project site is not within 2 miles of a public airport or an airport land use plan. Therefore, consistent with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would not expose people residing or working in the Project area to excessive noise levels, and impacts would be **less than significant**.

The level of impact associated with this issue would be slightly greater under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project but remain **less than significant**.

5.4.2.14 Population and Housing

The No Project/Buildout of Existing Land Use Alternative would develop the same Project site as the proposed Project. Because the Project site does not contain any habitable or occupied structures, implementation of this alternative would not require the demolition of existing housing and would not displace an existing population residing on the Project site. Similar to the proposed Project, construction of the No Project/Buildout of Existing Land Use Alternative would provide short-term construction jobs as well as long-term employment opportunities. However, the No Project/Buildout of Existing Land Use Alternative would generate more daily vehicle trips than the proposed Project (1,963 more daily vehicle trips, including 2,213 more passenger vehicle trips but 250 fewer truck trips when compared to the proposed Project). Based on the forecasted increase in passenger trip generation, implementation of the No Project/Buildout of Existing Land Use Alternative is expected to result in more long-term employment opportunities. In addition, consistent with the proposed Project, it is anticipated that the majority of the employment opportunities offered by this alternative would be filled by existing city and county residents who already have housing within the city or county and would likely not relocate as a result of employment, although it is possible that a nominal number of employees could relocate to the city or nearby unincorporated county areas.

As stated in Section 3.14.3.4, Jobs/Housing Balance, the city of Lake Elsinore had a 0.84:1 jobs-to-housing ratio in 2019. Similar to Riverside County, the SCAG population and employment growth projections shown in Tables 3.14.B and 3.14.C indicate that the city is expected to continue to add housing faster than jobs between 2019 and 2050. Therefore, the expected increase in employment under the No Project/Buildout of Existing Land Use Alternative would further contribute to improving

the jobs to housing ratio in the city and better contribute to the City's established goal of achieving a balance of one job per every 1.05 households, or a jobs-to-housing ratio of 0.95:1, by 2030.[6]

Consistent with the proposed Project, construction and operation of this alternative would result in a **less than significant** impact associated with inducing substantial population growth or demand for housing through increased employment. Similar to the proposed Project, development of the No Project/Buildout of Existing Land Use Alternative would require the extension of existing utility infrastructure and roadway and street improvements. However, these improvements are not expected to indirectly or directly induce substantial unplanned population growth within the city. Impacts would be **less than significant,** and no mitigation measures are required. The level of impact associated with this issue would be slightly less under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project and remain **less than significant**.

5.4.2.15 Public Services

As discussed above, the No Project/Buildout of Existing Land Use Alternative would generate more daily vehicle trips than the proposed Project (1,963 more daily vehicle trips, including 2,213 more passenger vehicle trips but 250 fewer truck trips compared to the proposed Project). Based on the forecasted increase in passenger trip generation, implementation of the No Project/Buildout of Existing Land Use Alternative is expected to result in more long-term employment opportunities and, therefore, an increased demand on public services, including fire protection and law enforcement services. Consistent with the proposed Project, implementation of **RCMs PS-1**, **TRA-1,** and **FIRE-1** during construction of the No Project/Buildout of Existing Land Use Alternative would ensure that potential impacts related to fire and police protection, emergency medical services, and emergency access would be **less than significant** and no mitigation measures are required. Furthermore, implementation of **RCM PS-2,** requiring payment of DIFs to the City that would contribute to the fair-share funding for Riverside County Fire Department (RCFD) improvements, Lake Elsinore Police Department (LEPD) improvements, and Lake Elsinore Unified School District (LEUSD) improvements, would reduce potential impacts related to RCFD, LEPD, and LEUSD and its schools to **less than significant**. Consistent with the proposed Project, implementation of the No Project/Buildout of Existing Land Use Alternative would result in **less than significant** impacts related to parks and other public facilities such as libraries, and no mitigation measures are required.

RCMs PS-1, TRA-1, and **FIRE-1** during construction and **RCM PS-2** for operation would be tailored to the specific development parameters of the No Project/Buildout of Existing Land Use Alternative and, therefore, would ensure impacts associated with public services under this alternative would remain **less than significant** and no mitigation measures are required. The level of impact associated with this issue would be slightly greater under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project but remain **less than significant**.

5.4.2.16 Recreation

The No Project/Buildout of Existing Land Use Alternative consists of development of an industrial park on the same site as the proposed Project. No recreational facilities are proposed as part of the proposed Project or this alternative. Similar to the proposed Project, the No Project/Buildout of

[6] City of Lake Elsinore. 2011. City of Lake Elsinore General Plan, Chapter 2.0, Community Form. December 11.

Existing Land Use Alternative would not include the development of residential units and would therefore not directly add to the existing population of the city. The No Project/Buildout of Existing Land Use Alternative would, however, increase employment opportunities in the city to a greater degree than the proposed Project. Consistent with the proposed Project, jobs created by this alternative are anticipated to be filled primarily by existing city residents or residents in nearby municipalities in the county. Therefore, it is expected that existing city residents and county residents already use park and recreation facilities within the city and county. Consistent with the proposed Project, payment of DIFs as codified in **RCM PS-2** would contribute to funding for park and recreation facilities in the city. Although the No Project/Buildout of Existing Land Use Alternative is not anticipated to notably increase the number of residents in the city, the anticipated increase in employment would generate an increased use of existing neighborhood or regional parks and other recreational facilities. However, in the absence of a substantial increase in permanent residents in the City, the City's existing parkland-to-resident ratio would not significantly increase. Therefore, the need for new or expanded park facilities under the No Project/Buildout of Existing Land Use Alternative would be **less than significant,** consistent with the proposed Project. The level of impact associated with this issue would be slightly greater under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project but remain **less than significant**.

5.4.2.17 Transportation

The No Project/Buildout of Existing Land Use Alternative would develop an approximately 1,290,008-square-foot industrial park development on the same Project site as the proposed Project. Roadway and infrastructure improvements identified for the proposed Project would be conditioned by the City to accommodate the No Project/Buildout of Existing Land Use Alternative and would be constructed consistent with City standards and regulations.

Trip generation rates for the No Project/Buildout of Existing Land Use Alternative were determined using the ITE *Trip Generation Manual, 11th Edition,* Land Use Code 130 – Industrial Park. As shown in Table 5.C: No Project/Buildout of Existing Land Use Alternative Trip Generation, the No Project/Buildout of Existing Land Use Alternative is estimated to generate approximately 4,347 daily trips, 439 a.m. (356 inbound and 83 outbound) peak-hour trips, and 439 p.m. (97 inbound and 342 outbound) peak-hour trips. The No Project/Buildout of Existing Land Use Alternative trip generation was adjusted using PCE factors from the *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled for County of Riverside*.[7] PCE factors provide an adjustment for the increased roadway capacity utilized by truck trips due to their heavier weight, larger size, and reduced maneuverability. In terms of PCE, the No Project/Buildout of Existing Land Use Alternative is estimated to generate approximately 5,444 daily PCE trips, 550 a.m. (446 inbound and 104 outbound) peak-hour PCE trips, and 550 p.m. (122 inbound and 428 outbound) peak-hour PCE trips.

[7] County of Riverside. 2020. *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled for County of Riverside.* December.

Table 5.C: No Project/Buildout of Existing Land Use Alternative Trip Generation

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Trip Rates							
Industrial Park[1]	3.37	0.28	0.06	0.34	0.07	0.27	0.34
No Project/Buildout of Existing Land Use Alternative Trip Generation							
Industrial Park (1,290.00762 TSF)	4,347	356	83	439	97	342	439
Vehicle Mix[2]							
Passenger Vehicles (83.1 percent)	3,613	296	69	365	80	285	365
2-Axle Trucks (3.7 percent)	161	13	3	16	4	12	16
3-Axle Trucks (3.0 percent)	130	11	2	13	3	10	13
4+-Axle Trucks (10.2 percent)	443	36	9	45	10	35	45
Total	*4,347*	*356*	*83*	*439*	*97*	*342*	*439*
PCE Trip Generation[3]							
Passenger Vehicles (PCE Factor 1.0)	3,613	296	69	365	80	285	365
2-Axle Trucks (PCE Factor 1.5)	242	20	4	24	6	18	24
3-Axle Trucks (PCE Factor 2.0)	260	22	4	26	6	20	26
4+-Axle Trucks (PCE Factor 3.0)	1,329	108	27	135	30	105	135
Total	*5,444*	*446*	*104*	*550*	*122*	*428*	*550*
Total Passenger Trip Generation	**3,613**	**296**	**69**	**365**	**80**	**285**	**365**
Total Alternative Trip Generation	**4,347**	**356**	**83**	**439**	**97**	**342**	**439**
Total PCE Trip Generation	**5,444**	**446**	**104**	**550**	**122**	**428**	**550**

Source: EPD Solutions, Inc. (October 7, 2025).

[1] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition, 2021.* Land Use Code 130 – Industrial Park.

[2] Truck percentage is from the Institute of Transportation Engineers, Trip Generation, 11th Edition, 2021 for ITE 130 – Industrial Park. Truck axle split from SCAQMD Composite of the SCAQMD *Warehouse Truck Trip Study Data Results and Usage* (July 17, 2014).

[3] PCE factors from *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled for County of Riverside,* (December 2020).

PCE = passenger car equivalent
SCAQMD = South Coast Air Quality Management District
TSF = thousand square feet

As discussed in Section 3.17, Transportation, the proposed Project is estimated to generate approximately 2,384 daily trips, 167 a.m. (128 inbound and 39 outbound) peak-hour trips, and 183 p.m. (53 inbound and 130 outbound) peak-hour trips. The Project trip generation was adjusted using PCE factors from the *Riverside County Transportation Analysis Guidelines*.[8] The proposed Project is estimated to generate approximately 3,757 daily PCE trips, 258 a.m. (197 inbound and 61 outbound) peak-hour PCE trips, and 281 p.m. (81 inbound and 200 outbound) peak-hour PCE trips. As compared to the proposed Project's PCE trip generation, the No Project/Buildout of Existing Land Use Alternative would result in 1,963 more daily vehicle trips, including 272 more a.m. peak-hour trips and 256 more p.m. peak-hour trips.

Consistent with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system; would not create hazards through design; and would not result in inadequate emergency access with

[8] County of Riverside. 2020. *Riverside County Transportation Analysis Guidelines.* December.

implementation of **RCM TRA-1**. Consistent with the proposed Project, these impacts under this alternative would remain **less than significant** and no mitigation measures are required.

Similar to the proposed Project, the No Project/Buildout of Existing Land Use Alternative would be located in a low-vehicle-miles-traveled (VMT) generation area as the traffic analysis zone (TAZ) that contains the Project site has an average VMT per capita of 31.3, which is less than the City's threshold of 35.5. As such, the No Project/Buildout of Existing Land Use Alternative would be presumed to have a **less than significant** VMT impact, similar to the proposed Project.

Overall, the level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.18 Tribal Cultural Resources

The No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project and would result in similar alterations to the Project site. Therefore, consistent with the proposed Project, construction of this alternative has the potential to significantly impact unidentified tribal cultural resources during ground-disturbing activities. With implementation of **MMs CUL-1** through **CUL-7**, potentially significant impacts to tribal cultural resources that are (1) 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 (PRC) Section 5020.1(k), and/or (2) determined by the Lead Agency to be significant pursuant to criteria set forth in PRC Section 5024.1, subdivision (c), would be reduced to **less than significant**. The level of impact associated with this issue would remain the same under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project.

5.4.2.19 Utilities and Service Systems

The No Project/Buildout of Existing Land Use Alternative would develop an industrial park instead of an industrial warehouse on the same site as the proposed Project. The No Project/Buildout of Existing Land Use Alternative would connect to existing utility infrastructure in the vicinity of the Project site and would include the installation of the same utility improvements as the proposed Project, including a new Elsinore Valley Municipal Water District (EVMWD) operated 36-inch water transmission line in the Nichols Road and Baker Street ROWs, a new EVMWD-operated 8-inch sewer line in the Baker Street ROW, and stormwater conveyance infrastructure to address stormwater runoff from the Project site and from the properties southwest of the Onsite Development Area.

As discussed above, implementation of the No Project/Buildout of Existing Land Use Alternative is expected to result in more long-term employment opportunities and therefore an increased demand on utilities and service systems, including water, wastewater, stormwater, electricity, natural gas, and telecommunications infrastructure, than the proposed Project. However, in the absence of a substantial increase in permanent residents in the city, the No Project/Buildout of Existing Land Use Alternative would not require, nor would it result in, the construction of new utilities facilities or the expansion of existing facilities beyond the improvements detailed above in Section 5.1.1, Project Summary. Impacts would be **less than significant**, similar to the proposed Project.

In addition, because the EVMWD's Urban Water Management Plan (UWMP), which found that the EVMWD would have sufficient supplies available during normal, single-dry-year, and 5-year-drought

conditions, incorporates anticipated build out of land uses in the City's General Plan, and because the No Project/Buildout of Existing Land Use Alternative would implement the existing General Plan land use designation of Limited Industrial and Floodway, development of the No Project/Buildout of Existing Land Use Alternative is consistent with the EVMWD's water supply and demand analysis, and sufficient supplies exist to serve the proposed Project.

Although the No Project/Buildout of Existing Land Use Alternative is anticipated to generate more employment than the proposed Project, the corresponding increase in wastewater and solid waste generation is not expected to exceed the capacity of the EVMWD, the Regional Water Reclamation Facility (WRF), or El Sobrante Landfill. Lastly, the No Project/Buildout of Existing Land Use Alternative would be required to comply with all standards related to solid waste diversion, reduction, and recycling during construction and operation, similar to the proposed Project, and impacts would be **less than significant.**

Therefore, consistent with the proposed Project, implementation of the No Project/Buildout of Existing Land Use Alternative would result in **less than significant** impacts with respect to utilities and service systems and no mitigation measures are required. The level of impact associated with this issue would be slightly greater under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project but would remain **less than significant**.

5.4.2.20 Wildfire

The No Project/Buildout of Existing Land Use Alternative would develop the same site as the proposed Project and would result in similar alterations to the Project site. As previously stated, it is expected that roadway and infrastructure improvements identified for the proposed Project would be consistent with those included in the No Project/Buildout of Existing Land Use Alternative and would be constructed consistent with City standards and regulations. Consistent with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would comply with applicable CBC, California Fire Code (CFC), RCFD, and City Municipal Code regulations and would include ignition-resistant materials, fire-safe fuel breaks, and fuel modification zones.

As with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would implement **RCM TRA-1, RCMs PS-1** and **PS-2, MM FIRE-1,** and **RCMs FIRE-1** and **FIRE-2** to reduce potential impacts related to emergency access and evacuation and fire protection. Specifically, **RCM FIRE-2** would require implementation of a Project-specific Fire Protection Plan (FPP), similar to the proposed Project. As such, consistent with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would result in **less than significant** impacts related to wildfire, and no mitigation measures are required. The level of impact associated with this issue would be slightly greater under the No Project/Buildout of Existing Land Use Alternative compared to the proposed Project but would remain **less than significant**.

5.4.3 Summary of No Project/Buildout of Existing Land Use Alternative

As discussed above, the No Project/Buildout of Existing Land Use Alternative would develop the Project site with an industrial park instead of an industrial warehouse development, which would result in an increase in Project-generated trips, emission of air pollutants, and GHGs during construction and operation, and operational traffic noise due to the increase in Project-generated

trips. In addition, as the No Project/Buildout of Existing Land Use Alternative would generate more employment than the proposed Project, implementation of this alternative would result in slightly greater construction and operational noise, demand on public services, recreation facilities, and utilities, and risks associated with wildfire during operation compared to the proposed Project.

As discussed in Sections 5.4.2.3 and 5.4.2.8, implementation of the No Project/Buildout of Existing Land Use Alternative would not reduce or avoid the significant and unavoidable air quality and GHG impacts. The majority of the proposed Project's operational-source NO_X emissions would be generated by passenger cars and trucks accessing the Project site, and the No Project/Buildout of Existing Land Use Alternative would result in 1,963 more daily vehicle trips, including 272 more a.m. peak-hour trips and 256 more p.m. peak-hour trips, when compared to the proposed Project. As such, the No Project/Buildout of Existing Land Use Alternative is anticipated to result in increased generation of NO_X and GHG emissions during operation when compared to the proposed Project. Therefore, implementation of the No Project/Buildout of Existing Land Use Alternative would continue to result in **significant and unavoidable** impacts even with implementation of **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3**, and the regulations implemented by the USEPA and CARB to improve truck efficiency.

Development under this alternative would result in earth disturbance, removal of existing vegetation, and alteration of the Project site similar to what is planned under the proposed Project. With adherence to standard City codes, regulations, standards, and/or Project-specific mitigation, it is reasonable that land-based impacts (agricultural, biological, cultural resources, geology and soils, hazards, hydrology and water quality, mineral resources, tribal cultural resources, wildfire, etc.) would have impacts similar to those associated with development of the proposed Project.

Because the No Project/Buildout of Existing Land Use Alternative would generate more daily vehicle trips and corresponding employment than the proposed Project, the No Project/Buildout of Existing Land Use Alternative is anticipated to result in slightly greater demand on public services, including fire protection, police protection, parks, and utilities and service systems, including water, wastewater, stormwater, electricity, natural gas, and telecommunications infrastructure, than the proposed Project. As with the proposed Project, the No Project/Buildout of Existing Land Use Alternative would not result in a substantial increase in permanent residents in the city and would implement **RCM TRA-1, RCMs PS-1** and **PS-2, MM FIRE-1,** and **RCMs FIRE-1** and **FIRE-2** to reduce potential impacts related to emergency access and evacuation and fire protection. Specifically, **RCM FIRE-2** would require implementation of a Project-specific FPP, similar to the proposed Project. Therefore, impacts related to the provision of public services and utilities remain less than significant. Notably, impacts related to population and housing would be less but would remain less than significant under this alternative, similar to the proposed Project. The level of potential impacts resulting from development of the No Project/Buildout of Existing Land Use Alternative would remain the same compared to the proposed Project for aesthetics, agriculture and forestry, biological, cultural resources, tribal cultural resources, geology and soils, hydrology, land use, mineral resources, and transportation but would be less for population and housing and greater for air quality, energy, GHG emissions, hazards, noise, public services, recreation, utilities, and wildfire.

Due to the similarity in the development size and location to the proposed Project, this alternative generally satisfies the Project objectives. Although the mix of office and industrial uses under this

alternative would likely contain less industrial uses than the proposed Project, this alternative is expected to increase employment opportunities compared to the proposed Project and therefore satisfy the first Project objective related to providing flexible and diverse industrial land uses to the same or greater degree than the proposed Project.

5.5 REDUCED PROJECT ALTERNATIVE (ALTERNATIVE 3)

The following provides a description of the Reduced Project Alternative and its anticipated environmental impacts. The purpose of the Reduced Project Alternative is to reduce vehicle and truck trips, which are the primary source of Project-related air quality and GHG impacts.

The emphasis of the analysis is on comparing the anticipated environmental impacts of the Reduced Project Alternative to the environmental impacts associated with the proposed Project. The discussion includes a determination of whether the Reduced Project Alternative would reduce, eliminate, or create new significant environmental impacts and would or would not meet the objectives of the proposed Project.

5.5.1 Reduced Project Alternative Characteristics

The Reduced Project Alternative would result in the development of a single warehouse building totaling 500,225 square feet. This represents a reduction in development of 500,226 square feet, or approximately 50 percent, compared to the proposed Project. It is assumed that the warehouse building would have a similar configuration as the proposed Project and other components of the proposed Project related to access, landscaping, infrastructure, and other amenities would remain the same. Roadway and infrastructure improvements identified for the proposed Project would also remain the same under this alternative.

5.5.2 Analysis of Reduced Project Alternative

The potential impacts associated with the Reduced Project Alternative are described below. As discussed, the Reduced Project Alternative would develop the same use as the proposed Project on the same Project site, but at half of the proposed square footage. As such, it can be assumed that construction methods, equipment, and activities would be similar for both the proposed Project and this alternative. It can also be assumed that alterations to topography and vegetation on the site would be similar for both developments, but that less development area would be included in the Reduced Project Alternative. The same regulations, ordinances, standards, and policies applicable to the proposed Project would be applicable to this alternative.

5.5.2.1 Aesthetics

Similar to the proposed Project, development of the Reduced Project Alternative would alter the existing visual condition of the Project site through the introduction of development on the currently underutilized Project site, although at reduced intensity and likely overall reduced site coverage and building massing. The Reduced Project Alternative would comply with the City's General Plan goals and policies regarding aesthetics and would be visually comparable to the proposed Project. The design guidelines and landscaping plan would also ensure the Project site is developed with consistent visual characteristics of the surrounding uses. The architectural design and landscaping of the warehouse building would be the same as the proposed Project. It is expected that the overall visual

appearance under this alternative would be similar to the proposed Project, but on a smaller area of the site that would not represent a significant impact.

As with the proposed Project, construction of the Reduced Project Alternative would be required to implement **MM AES-1,** which would require the temporary nighttime lighting that may be used within the construction staging areas to be downward facing and hooded. In addition, the development associated with this alternative would comply with the City's lighting standards and requirements, as detailed in Section 17.112.040 (Lighting) and Section 17.148.110 (Lighting, Parking Requirements) of the City's Municipal Code. The Reduced Project Alternative would also comply with the County of Riverside's Ordinance 655 addressing nighttime light pollution and the City's "Good Neighbor Policy," as applicable, similar to the proposed Project.

As the development envisioned under this alternative would occur on the same Project site as that of the proposed Project but at a reduced scale with one building, impacts related to the aesthetic condition and visual resources would be similarly **less than significant** and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.2 Agriculture and Forestry Resources

As the Reduced Project Alternative would develop the same Project site as the proposed Project, impacts to agriculture and forestry resources would be similar to those resulting from the proposed Project. Consistent with the proposed Project, **no impact** related to agriculture and forestry resources would occur under this alternative. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.3 Air Quality

The Reduced Project Alternative would develop the same Project site as the proposed Project with a single warehouse building totaling 500,225 square feet, resulting in a reduction of approximately 500,226 square feet (approximately 50 percent) compared to the proposed Project. The Reduced Project Alternative would include the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. As previously stated, this alternative would also include the 37.86 acres of off-site improvements; a 33.65-acre Restoration Area; and a 2.72-acre Construction/Improvements Buffer between Baker Street and the Restoration Area, similar to the proposed Project.

Because the Reduced Project Alternative would result in an approximately 50 percent reduction in development compared to the proposed Project, the Reduced Project Alternative would result in a reduction in the amount of pollutants emitted during construction and operation of the alternative. Similar to the proposed Project, during construction, short-term degradation of air quality may occur due to the release of particulate emissions generated by grading, paving, building, and other activities. Emissions from construction equipment from this alternative would include CO, NO_X, VOCs, directly emitted particulate matter ($PM_{2.5}$ and PM_{10}), and TACs such as diesel exhaust particulate matter. However, construction emissions associated with the Reduced Project Alternative would be less than the proposed Project due to the reduction in development, and are also not expected to exceed the SCAQMD's thresholds, similar to the proposed Project. Therefore, construction of the Reduced Project

Alternative would not result in a cumulatively considerable increase of any criteria pollutant for which the region is in nonattainment under an applicable NAAQS or CAAQS, similar to the proposed Project, and construction impacts would be **less than significant**.

Similar to the proposed Project, long-term air pollutant emission impacts from implementation of the Reduced Project Alternative are those associated with mobile-source emissions (e.g., vehicle and truck trips), energy-source emissions (e.g., natural gas), area-source emissions (e.g., architectural coatings and the use of landscape maintenance equipment), on-site cargo handling equipment emissions, and stationary-source emissions (use of diesel-powered emergency generators). Mobile-source emissions include VOCs and NO_X emissions that contribute to the formation of O_3. Additionally, PM_{10} emissions result from running exhaust, tire and brake wear, and the entrainment of dust into the atmosphere from vehicles traveling on paved roadways.

As discussed in Section 3.3, Air Quality, the proposed Project would exceed the significance criteria for daily emissions of NO_X, even with implementation of **MMs AQ-1** through **AQ-10**, **PDFs AQ-1** through **AQ-5,** and the regulations implemented by the USEPA and CARB to improve truck efficiency. As such, operation of the proposed Project would result in a significant impact related to a cumulatively considerable net increase of a criteria pollutant for which the region is in nonattainment under an applicable NAAQS or CAAQS, and impacts would be **significant and unavoidable.**

The majority of the proposed Project's operational-source NO_X emissions are generated by passenger cars and trucks accessing the Project site. As discussed in Section 5.4.2.17, below, the Reduced Project Alternative would result in 1,878 fewer daily vehicle trips, 129 fewer a.m. peak-hour trips, and 142 fewer p.m. peak-hour trips, when compared to the proposed Project. As such, the Reduced Project Alternative is anticipated to result in decreased generation of NO_X emissions when compared to the proposed Project. However, the NO_X emissions would continue to exceed applicable significance thresholds.

Consistent with the proposed Project, the majority of the operational-source NO_X emissions would be generated by passenger cars and trucks. Neither the Project Applicant nor the City has regulatory authority to control tailpipe emissions. Therefore, implementation of the Reduced Project Alternative is expected to result in **significant and unavoidable** impacts related to a cumulatively considerable net increase of a criteria pollutant for which the region is in nonattainment under an applicable NAAQS or CAAQS, even with implementation of **MMs AQ-1** through **AQ-10, PDFs AQ-1** through **AQ-5,** and the regulations implemented by the USEPA and CARB to improve truck efficiency, consistent with the proposed Project. Likewise, impacts associated with conflict with or obstructions of implementation of the applicable air quality plan would also be **significant and unavoidable,** similar to the proposed Project.

Consistent with the Project, the Reduced Project Alternative is not expected to exceed localized SCAQMD thresholds and would not expose nearby existing residential receptors to substantial pollutant concentrations. Construction and operation of the Reduced Project Alternative would also not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people with adherence to SCAQMD Rules 402 and 403 and CCR Title 13, Section 2449(d)(2). Impacts would be **less than significant,** similar to the proposed Project.

Under the Reduced Project Alternative operational air quality impacts are expected to be reduced compared to the proposed Project due to the reduction of building square footage and vehicle trips to and from the Project site. However, based on the scale of the Reduced Project Alternative that includes 500,225 square feet of industrial uses, implementation of the Reduced Project Alternative would result in **significant and unavoidable** air quality impacts, similar to the proposed Project.

5.5.2.4 Biological Resources

The Reduced Project Alternative would develop the same Project site as the proposed Project, with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Because of the reduced size and scale, implementation of the Reduced Project Alternative would result in fewer alterations to the Project site topography and vegetation as the development footprint would be smaller. Nevertheless, because the Reduced Project Alternative would develop the same Project site as the proposed Project, development would result in potentially significant impacts to San Diego ambrosia, Coulter's goldfields, Crotch's bumble bee, burrowing owl, least bell's vireo, and western spadefoot. Consistent with the proposed Project, implementation of **MMs BIO-1** through **BIO-9**, **RCM HAZ-1,** and **RCMs WQ-1** through **WQ-4** would ensure compliance with BMPs, applicable policies, and MSHCP guidelines to protect special-status species during construction and operation and reduce impacts related to biological resources to a less than significant level under the Reduced Project Alternative. Consistent with the proposed Project, the Reduced Project Alternative would not result in impacts to riparian habitat, sensitive natural communities, or wetlands with implementation of **MMs BIO-10** and **BIO-11,** which would mitigate impacts to the 0.50 acre of Riverine Areas and 0.17 acre associated with Vernal Pools 2 and 3 off site through the purchase of mitigation credits from the Riverpark Mitigation Bank and by expanding the existing vernal pools on the opposite (northern) side from the proposed impacts, respectively. Therefore, impacts on biological resources would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.5 Cultural Resources

The Reduced Project Alternative would develop the same Project site as the proposed Project, with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Because of the reduced size and scale, implementation of the Reduced Project Alternative would result in fewer alterations to the Project site topography and vegetation as the development footprint would be smaller. Nevertheless, consistent with the proposed Project, construction of this alternative has the potential to significantly impact unidentified historic and archaeological resources during ground-disturbing activities. With implementation of **MMs CUL-1** through **CUL-7**, potentially significant impacts to historical and archaeological resources during Project construction would be reduced to **less than significant**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.6 Energy

The Reduced Project Alternative would develop the same Project site as the proposed Project but at a 50 percent reduction compared to the proposed Project. The Reduced Project Alternative would

include the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing), but at a reduced scale. Furthermore, the Reduced Project Alternative would be required to comply with CCR Title 13, Sections 2449 and 2485, which limit idling from both on-road and off-road diesel-powered equipment and are enforced by the CARB, as well as Title 24 Energy Efficiency Standards, which contain energy efficiency requirements for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. The Title 24 Energy Efficiency Standards establish performance metrics in the form of an "energy budget" based on energy consumption per square foot of floor space. The Title 24 Energy Efficiency Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Implementation of this alternative would result in lower energy demand during construction and operation compared to the proposed Project because of the reduced construction activity and level of development. In addition, as the Reduced Project Alternative would result in 1,878 fewer daily vehicle trips, including 129 fewer a.m. peak-hour trips and 142 fewer p.m. peak-hour trips when compared to the proposed Project, operational energy use associated with fuel used for vehicle trips would be less than the proposed Project.

The Reduced Project Alternative would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and would be required to adhere to all federal, State, and local requirements for energy efficiency, including the latest Energy Code, similar to the proposed Project. Accordingly, consistent with the proposed Project, this alternative would not result in the wasteful, inefficient, or unnecessary consumption of fuel or energy during construction or operation. Therefore, consistent with the proposed Project, energy impacts would be **less than significant**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.7 Geology and Soils

The Reduced Project Alternative would develop the same Project site as the proposed Project and, therefore, would result in the same potential impacts related to geology and soils and seismic hazards as the proposed Project. Consistent with the proposed Project, compliance with the applicable provisions of the CBC and the design parameters and recommendations of the site-specific Geotechnical Evaluation would be required as a condition of the grading and/or building permit, as specified in **MM GEO-1**. With implementation of **MM GEO-1**, impacts resulting from strong seismic ground shaking, seismic-related ground failure, liquefaction, landslide, unstable slopes, expansive soils, and soil collapse would be reduced to less than significant. In addition, similar to the proposed Project, the Reduced Project Alternative would also be required to adhere to the BMPs contained in the SWPPP pursuant to **RCM WQ-1** and the WQMP pursuant to **RCM WQ-3**, which would ensure appropriate measures are taken to prevent the substantial loss of topsoil and erosion from occurring during Project construction and operation.

Assuming the maximum depth of excavation during construction of this alternative would be similar to the proposed Project, this alternative has the potential to significantly impact nonrenewable paleontological resources. Consistent with the proposed Project, implementation of **MM GEO-2** would ensure that paleontological resources, if encountered during Project construction of this alternative,

would be retrieved for future scientific study and protection, thereby reducing potential impacts to paleontological resources to less than significant. Therefore, impacts related to geology and soils would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.8 Greenhouse Gas Emissions

The Reduced Project Alternative would develop the same Project site as the proposed Project with a single warehouse building totaling 500,225 square feet, which is a 50 percent reduction compared to the proposed Project. The Reduced Project Alternative would include the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Therefore, implementation of this alternative would generate less GHG emissions during construction and operation compared to the proposed Project due to the reduction in development and subsequent reduction in energy demand. In addition, as the Reduced Project Alternative would result in 1,878 fewer daily vehicle trips, including 129 fewer a.m. peak-hour trips and 142 fewer p.m. peak-hour trips when compared to the proposed Project, operational GHG emissions associated with fuel used for vehicle trips would also be less than the proposed Project. The Reduced Project Alternative would also be required to implement **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3**, and the regulations implemented by the USEPA and CARB to improve truck efficiency.

However, based on the scale of the Reduced Project Alternative, which would include development of 500,225 square feet of industrial uses, the reduction of building square footage and vehicle trips to and from the Project site is not expected to reduce GHG emissions to below applicable significance thresholds. Therefore, implementation of the Reduced Project Alternative would continue to result in **significant and unavoidable** impacts related to operational GHG emissions, even with implementation of **MMs AQ-1** through **AQ-6**, **PDFs AQ-1** through **AQ-5**, and **MMs GHG-1** through **GHG-3,** similar to the proposed Project.

In addition, similar to the proposed Project, although the Reduced Project Alternative would be consistent with the applicable measures and goals from the 2022 Scoping Plan, the 2024–2050 RTP/SCS, and the City's CAP, the alternative would result in a significant impact related to conflict with applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs because it is expected to exceed GHG emissions thresholds based on the scale of the Reduced Project Alternative, which includes 500,225 square feet of industrial uses. As such, the Reduced Project Alternative would not comply with existing State regulations adopted to achieve the overall GHG emissions reduction goals identified in the 2022 Scoping Plan, EO B-30-15, and AB 197 and would not be consistent with applicable State plans and programs designed to reduce GHG emissions. Therefore, impacts would be **significant and unavoidable**, consistent with the proposed Project.

Under the Reduced Project Alternative operational GHG impacts are expected to be reduced compared to the proposed Project due to reduction of building square footage and vehicle trips to and from the Project site. However, based on the scale of the Reduced Project Alternative, which includes 500,225 square feet of industrial uses, implementation of the Reduced Project Alternative would result in **significant and unavoidable** GHG impacts, consistent with the proposed Project.

5.5.2.9 Hazards and Hazardous Materials

The Reduced Project Alternative would develop the same Project site with industrial park uses at a reduced size and scale as the proposed Project. Construction of the Reduced Project Alternative would be similar to construction of the proposed Project and would therefore result in similar potential impacts related to the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials during construction. Therefore, consistent with the proposed Project, compliance with applicable regulatory policies and adherence to the regulatory standards included in **RCMs WQ-1** through **WQ-4** would ensure impacts related to the routine transport, use, or disposal of hazardous materials during construction would be less than significant.

As the Reduced Project Alternative would include the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale, the Reduced Project Alternative would use the same types of hazardous materials and dispose of the same types of hazardous waste as the proposed Project, but at a reduced scale. As such, the Reduced Project Alternative would also be required to prepare and implement an HMBP for future use of the Reduced Project Alternative, as detailed in **RCM HAZ-1**.

The prior use of the Onsite Development Area and vicinity for agriculture could have resulted in unknown subsurface conditions on the Project site, which could include buried pipelines or irrigation channels, septic tanks,[9] and/or other buried objects/debris that may contain asbestos or other hazardous materials. Because the Reduced Project Alternative would develop the same site as the proposed Project, the Reduced Project Alternative would also be required to implement **MMs HAZ-1** and **HAZ-2** to ensure any lead, asbestos, or other potentially hazardous materials from sources that include these unknown subsurface conditions are managed in accordance with applicable regulatory requirements. In addition, based on the Project site's location, impacts related to an accidental release of hazardous materials or emissions of hazardous substances within 0.25 mile of an existing or proposed school would be less than significant, similar to the proposed Project, as no existing or proposed schools exist within 0.25 mile of the Project site and no impacts related to airport hazards or being located on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 would occur, consistent with the proposed Project.

Consistent with the proposed Project, the Reduced Project Alternative would also be required to implement **RCMs TRA-1** and **FIRE-1** to ensure that impacts related to emergency response/evacuation and wildfire would be **less than significant**.

Therefore, impacts related to hazards and hazardous materials would be similarly **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

[9] The discovery of septic tanks or similar sewage disposal facilities and subsequent abandonment requires a permit from the Riverside County Department of Environmental Health pursuant to California Plumbing Code Section 722, which stipulates specific conditions for the safe removal of remnant sewage and componentry, backfilling, and inspection from the Riverside County Building & Safety Division.

5.5.2.10 Hydrology and Water Quality

The Reduced Project Alternative would develop the same Project site as the proposed Project with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Because of the reduced size and scale, implementation of the Reduced Project Alternative would result in fewer alterations to the Project site topography. Nevertheless, implementation of the Reduced Project Alternative would increase the amount of stormwater runoff due to the increase in the amount of impervious surface area and could alter the existing drainage pattern, similar to the proposed Project. The Reduced Project Alternative would be subject to applicable City and NPDES permit requirements and would be required to adhere to **RCMs WQ-1** through **WQ-4**, including the application of construction and operational BMPs and other regulatory permits and requirements that would reduce potential impacts to hydrology and water quality to **less than significant**. Consistent with the proposed Project, impacts related to Project inundation and conflict with or obstruction of a water quality control plan or sustainable groundwater management plan would be **less than significant,** and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.11 Land Use and Planning

The Reduced Project Alternative would develop the same Project site as the proposed Project, with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Similar to the proposed Project, under this alternative, the Project site would be developed in compliance with the applicable standards and guidelines established for the existing Limited Industrial General Plan Land Use Designation and the M-1, M-2, and OS zoning designations, and would not result in significant land use impacts with implementation of Project- and site-specific mitigation.

Because the Reduced Project Alternative would develop the same uses on the Project site as the proposed Project, development of this alternative would be consistent with the relevant goals and policies of the City's General Plan through implementation of **RCM HAZ-1** to prepare an HMBP via CERS; **RCM FIRE-2,** which requires a fuel modification zone to be maintained on a regular basis to ensure efficacy pursuant to **MM FIRE-1**; **MM GEO-1**, which ensures conformance with the current CBC, applicable City standards, and recommendations identified in the Geotechnical Evaluation; **RCMs WQ-1** through **WQ-4,** which require compliance with applicable NPDES permits, including the Construction General Permit, the Groundwater Discharge Permit, the Riverside County MS4 Permit, and Chapter 14.08 of the City's Municipal Code; **MMs CUL-1** through **CUL-7,** which detail methods to protect any cultural, tribal cultural, or archaeological resources that may be encountered during Project construction; and **MM GEO-2**, which prevents impacts on significant, nonrenewable paleontological resources and/or reduces them to less than significant with mitigation incorporated, similar to the proposed Project. In addition, several of the mitigation measures, PDFs, and RCMs prescribed for the proposed Project would apply to the Reduced Project Alternative and correspond to the BMPs identified in the *Attorney General's Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act* guidance, including **MMs AQ-1, AQ-3, AQ-4, AQ-5, AQ-9,** and **AQ-10**; **PDFs AQ-3** through **AQ-5**; and **RCMs N-1** and **TRA-1.** Furthermore, this alternative would generally be consistent with the applicable standards of the City of Lake Elsinore's "Good Neighbor

Policy" through implementation of **MM AQ-1** and **RCM N-1.** Also, impacts on candidate, sensitive, or special-status species and associated habitats would be addressed through compliance with MSHCP policies via implementation of **MMs BIO-1** through **BIO-11**, including development and implementation of a San Diego Ambrosia Translocation Plan; restoration/expansion of Coulter's goldfields habitat; conducting species-specific surveys (as appropriate) for Crotch's bumble bee, burrowing owl, least Bell's vireo, and western spadefoot; conducting worker environmental awareness trainings; erection of temporary sound barriers; and purchase of mitigation lands. Additionally, **RCMs HAZ-1** and **WQ-1** through **WQ-4** would ensure indirect effects associated with development in proximity to the MSHCP Conservation Area remain less than significant.

In addition, as the Reduced Project Alternative would develop the same Project site as the proposed Project, implementation of the alternative would not physically divide an established community.

Consistent with the proposed Project, this alternative would result in impacts related to land use and planning that are **less than significant with mitigation incorporated**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.12 Mineral Resources

The Reduced Project Alternative would develop the same Project site as the proposed Project. Although the Project site is mapped as MRZ-3, a designation assigned to areas that contain known or inferred mineral occurrences of unknown significance designated as an area where significant mineral deposits are present, there are no records that indicate the Project site was previously used as a mineral resource recovery site or as a site occupied by mines. Furthermore, the City's General Plan does not designate the Project site as within a land use designation that allows for mineral extraction, nor does the City designate the Project site as an area held in reserve for future mining activities. Therefore, consistent with the proposed Project, implementation of the Reduced Project Alternative would result in **less than significant** impacts with respect to mineral resources, and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.13 Noise

The Reduced Project Alternative would develop the same Project site as the proposed Project, with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Although the development under the Reduced Project Alternative would be smaller than the proposed Project, noise- and vibration-generating construction activities for both Projects would be similar. Consistent with the proposed Project, the Reduced Project Alternative would be required to adhere to **RCM N-1**, which would limit construction activities to between the hours of 7:00 a.m. and 7:00 p.m. on weekdays in compliance with Section 17.176.080[F] of the City's Municipal Code. With implementation of **RCM N-1**, construction noise and vibration impacts during construction of the Reduced Project Alternative would be **less than significant**, similar to the proposed Project.

As previously identified, the Reduced Project Alternative would generate fewer trips than the proposed Project (1,878 fewer daily vehicle trips, including 129 fewer a.m. peak-hour trips and 142

fewer p.m. peak-hour trips compared to the proposed Project). The decrease in daily trips under this alternative would decrease Project-related traffic noise levels. As discussed in Section 3.13, the increase in traffic noise with implementation of the proposed Project would exceed the City's ambient noise level increase threshold of 1.5 dBA. However, because there are no noise-sensitive uses along Nichols Road between I-15 and Terra Cotta Road, proposed Project-related traffic noise would be less than significant. The decrease in traffic noise associated with the Reduced Project Alternative, coupled with the lack of noise-sensitive uses in the vicinity of the Project site, would result in less than significant traffic noise impacts. Therefore, noise impacts associated with operation of the Reduced Project Alternative would be **less than significant** and no mitigation measures are required, similar to the proposed Project.

The Project site is not within 2 miles of a public airport or an airport land use plan. Therefore, consistent with the proposed Project, the Reduced Project Alternative would not expose people residing or working in the Project area to excessive noise levels, and impacts would be **less than significant**.

Under the Reduced Project Alternative, operational noise impacts would be less than the proposed Project due to the reduction in the number of vehicle trips to and from the Project site, and impacts would be **less than significant**. Overall, the level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.14 Population and Housing

The Reduced Project Alternative would develop the same Project site as the proposed Project, with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Because the Project site does not contain any habitable or occupied structures, implementation of this alternative would not require the demolition of existing housing and would not displace an existing population residing on the Project site. Similar to the proposed Project, construction of the Reduced Project Alternative would provide short-term construction jobs as well as long-term employment opportunities. Because of the reduced size and scale, implementation of the Reduced Project Alternative would result in fewer long-term employment opportunities compared to the proposed Project. However, consistent with the proposed Project, it is anticipated that the majority of the employment opportunities offered by this alternative would be filled by existing city and county residents who already have housing within the city or county and would likely not relocate as a result of employment. Therefore, consistent with the proposed Project, construction and operation of this alternative would result in a **less than significant** impact associated with inducing substantial population growth or demand for housing through increased employment. Similar to the proposed Project, development of the Reduced Project Alternative includes utility infrastructure and roadway and street improvements. However, these improvements are not expected to indirectly or directly induce substantial unplanned population growth within the City. Impacts would be **less than significant,** and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.15 Public Services

The Reduced Project Alternative would develop the same Project site as the proposed Project with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing), but at a reduced scale. Because of the reduced size and scale, implementation of the Reduced Project Alternative would result in reduced demand for public services, including fire protection, police protection, school, and park services, when compared to the proposed Project. In addition, consistent with the proposed Project, implementation of **RCMs PS-1**, **TRA-1,** and **FIRE-1** during construction of the Reduced Project Alternative would ensure that potential impacts related to fire and police protection, emergency medical services, and emergency access would be **less than significant,** and no mitigation measures are required. Furthermore, implementation of **RCM PS-2,** requiring payment of DIFs to the City that would contribute to the fair-share funding for RCFD improvements, LEPD improvements, and LEUSD improvements, would reduce potential impacts related to RCFD, LEPD, and LEUSD and its schools to **less than significant**. Consistent with the proposed Project, implementation of the Reduced Project Alternative would result in **less than significant** impacts related to parks and other public facilities such as libraries, and no mitigation measures are required.

Therefore, impacts associated with public services under the Reduced Project Alternative would be **less than significant,** and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.16 Recreation

The Reduced Project Alternative would develop the same Project site as the proposed Project, with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. No recreational facilities are proposed as part of the proposed Project or this alternative. Similar to the proposed Project, the Reduced Project Alternative would not include the development of residential units and would therefore not directly add to the existing population of the city. In addition, similar to the proposed Project, the Reduced Project Alternative would increase employment opportunities in the city, but at a reduced scale compared to the proposed Project. Consistent with the proposed Project, jobs created by this alternative are anticipated to be filled primarily by existing city residents or residents in nearby municipalities in the county. Therefore, it is expected that existing city residents and county residents already use park and recreation facilities within the city and county. Consistent with the proposed Project, payment of DIFs would contribute to funding for park and recreation facilities in the city. Because the Reduced Project Alternative is not anticipated to notably increase the number of residents in the city, it would not generate an increased need for use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of facilities would occur or be accelerated. Consistent with the proposed Project, impacts would be **less than significant,** and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.17 Transportation

The Reduced Project Alternative would develop the same Project site as the proposed Project with a single warehouse building totaling 500,225 square feet, resulting in a reduction of approximately 500,226 square feet (approximately 50 percent) compared to the proposed Project. The Reduced Project Alternative would include the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing), but at a reduced scale. As previously stated, it is assumed that roadway and infrastructure improvements identified for the proposed Project would remain the same under the No Project/Buildout of Existing Land Use Alternative and would be constructed consistent with City standards and regulations.

Trip generation rates for the Reduced Project Alternative were determined using the same land use codes from ITE *Trip Generation Manual, 11th Edition* as the proposed Project (Land Use Code 157 – High-Cube Cold Storage Warehouse and Land Use Code 140 – Manufacturing). To determine the trip generation associated with implementation of the Reduced Project Alternative, the Reduced Project Alternative was assumed to consist of approximately 450,203 square feet of high-cube cold storage

warehouse uses and 50,023 square feet of manufacturing uses. As shown in Table 5.D: Reduced Project Alternative Trip Generation, the Reduced Project Alternative is estimated to generate approximately 1,192 daily trips, 84 a.m. (65 inbound and 19 outbound) peak-hour trips, and 91 p.m. (26 inbound and 65 outbound) peak-hour trips. Reduced Project Alternative trip generation was adjusted using PCE factors from the Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled for County of Riverside.[10] The Reduced Project Alternative is estimated to generate approximately 1,879 daily PCE trips, 129 a.m. (98 inbound and 31 outbound) peak-hour PCE trips, and 139 p.m. (42 inbound and 97 outbound) peak-hour PCE trips.

As discussed in Section 3.17, Transportation, the proposed Project is estimated to generate 3,757 daily PCE trips, 258 a.m. (197 inbound and 61 outbound) peak-hour PCE trips, and 281 p.m. (81 inbound and 200 outbound) peak-hour PCE trips. As compared to the proposed Project's PCE trip generation, the Reduced Project Alternative would result in 1,878 fewer daily vehicle trips, including 129 fewer a.m. peak-hour trips and 142 fewer p.m. peak-hour trips. This represents about a 50 percent reduction in daily, a.m. peak-hour, and p.m. peak-hour trips.

Consistent with the proposed Project, the Reduced Project Alternative would not conflict with applicable programs, plans, ordinances, or policies addressing the circulation system; would not create hazards through design; and would not result in inadequate emergency access with implementation of **RCM TRA-1**. Consistent with the proposed Project, these impacts under this alternative would remain **less than significant** and no mitigation measures are required.

Similar to the proposed Project, the Reduced Project Alternative is located in a low-VMT-generation area as the TAZ that contains the Project site has an average VMT per capita of 31.3, which is less than the City's threshold of 35.5. As such, the Reduced Project Alternative would be presumed to have a **less than significant** VMT impact, similar to the proposed Project.

[10] County of Riverside. 2020. *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled for County of Riverside.* December.

Table 5.D: Reduced Project Alternative Trip Generation

Land Use	Daily	AM Peak Hour			PM Peak Hour		
		In	Out	Total	In	Out	Total
Trip Rates							
High-Cube Cold Storage Wareehouse[1]	2.12	0.08	0.03	0.11	0.03	0.09	0.12
Manufacturing[2]	4.75	0.52	0.16	0.68	0.23	0.51	0.74
Reduced Project Alternative Trip Generation							
High-Cube Cold Storage Warehouse							
High-Cube Cold Storage Warehouse (450.20295 TSF)	954	39	11	50	15	39	54
Vehicle Mix[3]							
Passenger Vehicles (55.3 percent)	527	22	6	28	8	22	30
2-Axle Trucks (15.5 percent)	148	6	2	8	2	6	8
3-Axle Trucks (4.9 percent)	47	2	0	2	1	2	3
4+-Axle Trucks (24.3 percent)	232	9	3	12	4	9	13
Total	954	39	11	50	15	39	54
PCE Trip Generation[4]							
Passenger Vehicles (PCE Factor 1.0)	527	22	6	28	8	22	30
2-Axle Trucks (PCE Factor 1.5)	222	9	3	12	3	9	12
3-Axle Trucks (PCE Factor 2.0)	94	4	0	4	2	4	6
4+-Axle Trucks (PCE Factor 3.0)	696	27	9	36	12	27	39
Total	1,539	62	18	80	25	62	87
Manufacturing							
Manufacturing (50.02255 TSF)	238	26	8	34	11	26	37
Vehicle Mix[5]							
Passenger Vehicles (72.5 percent)	172	20	4	24	7	20	27
2-Axle Trucks (4.6 percent)	11	1	1	2	1	1	2
3-Axle Trucks (5.7 percent)	14	1	1	2	1	1	2
4+-Axle Trucks (17.2 percent)	41	4	2	6	2	4	6
Total	238	26	8	34	11	26	37
PCE Trip Generation[4]							
Passenger Vehicles (PCE Factor 1.0)	172	20	4	24	7	20	27
2-Axle Trucks (PCE Factor 1.5)	17	2	1	3	2	1	3
3-Axle Trucks (PCE Factor 2.0)	28	2	2	4	2	2	4
4+-Axle Trucks (PCE Factor 3.0)	123	12	6	18	6	12	18
Total	340	36	13	49	17	35	52
Total Passenger Trip Generation	699	42	10	52	15	42	57
Total Alternative Trip Generation	1,192	65	19	84	26	65	91
Total PCE Trip Generation	1,879	98	31	129	42	97	139

Source: EPD Solutions, Inc. (October 7, 2025).

[1] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition, 2021.* Land Use Code 157 – High-Cube Cold Storage Warehouse.

[2] Trip rates from the Institute of Transportation Engineers, *Trip Generation, 11th Edition, 2021.* Land Use Code 140 – Manufacturing.

[3] Vehicle mix from the *SCAQMD Warehouse Truck Trip Study Data Results and Usage* (July 2014). Classification: With Cold Storage.

[4] PCE factors from *Transportation Analysis Guidelines for Level of Service Vehicle Miles Traveled for County of Riverside* (December 2020).

[5] Vehicle mix from the *SCAQMD Warehouse Truck Trip Study Data Results and Usage* (July 2014). Classification: Without Cold Storage.

PCE = passenger car equivalent

SCAQMD = South Coast Air Quality Management District

TSF = thousand square feet

Overall, the level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.18 Tribal Cultural Resources

The Reduced Project Alternative would develop the same Project site as the proposed Project with the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing), but at a reduced scale. Because of the reduced size and scale, implementation of the Reduced Project Alternative would result in fewer alterations to the Project site topography and vegetation as the development footprint would be smaller. Nevertheless, construction of this alternative has the potential to significantly impact unidentified tribal cultural resources during ground-disturbing activities. With implementation of **MMs CUL-1** through **CUL-7**, potentially significant impacts to tribal cultural resources that are (1) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in PRC Section 5020.1(k), and/or (2) determined by the lead agency to be significant pursuant to criteria set forth in of PRC Section 5024.1, subdivision (c), would be reduced to **less than significant**. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.19 Utilities and Service Systems

The Reduced Project Alternative would develop the same Project site as the proposed Project but at a 50 percent reduction compared to the proposed Project. The Reduced Project Alternative would include the same types of industrial uses as the proposed Project (i.e., high-cube cold storage and manufacturing) but at a reduced scale. Similar to the proposed Project, the Reduced Project Alternative would connect to existing utility infrastructure in the vicinity of the Project site and would include the installation of the same utility improvements as the proposed Project, including a new EVMWD-operated 36-inch water transmission line in the Nichols Road and Baker Street ROWs, a new EVMWD-operated 8-inch sewer line in the Baker Street ROW, and stormwater conveyance infrastructure to address stormwater runoff from the Project site and from the properties southwest of the Onsite Development Area.

Because of the reduced size and scale compared to the proposed Project, the Reduced Project Alternative is anticipated to result in less demand on utilities and service systems, including water, wastewater, stormwater, electricity, natural gas, and telecommunications infrastructure, than the proposed Project. Because implementation of the proposed Project would not require, nor would it result in, the construction of new utilities facilities or the expansion of existing facilities beyond the improvements included in the proposed Project, impacts would be **less than significant**, consistent with the proposed Project.

In addition, because the EVMWD's UWMP, which found that the EVMWD would have sufficient supplies available during normal, single-dry-year, and 5-year-drought conditions, incorporates anticipated future populations and land uses for the city as provided by the City's General Plan and the Reduced Project Alternative would be consistent with the existing General Plan Land Use Designation of Limited Industrial and Floodway, supplies needed by the Reduced Project Alternative have been included in the EVMWD's water supply and demand analysis, and sufficient supplies exist to serve the proposed Project. Further, because the Reduced Project Alternative is anticipated to

generate less wastewater and solid waste than the proposed Project, the EVMWD, Regional WRF, and El Sobrante Landfill are anticipated to have sufficient capacity to accommodate wastewater and solid waste from the alternative in addition to their existing commitments, consistent with the proposed Project. Lastly, the Reduced Project Alternative would be required to comply with all standards related to solid waste diversion, reduction, and recycling during construction and operation, and impacts would be **less than significant.**

Therefore, consistent with the proposed Project, implementation of the Reduced Project Alternative would result in **less than significant** impacts with respect to utility and service systems, and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.2.20 Wildfire

The Reduced Project Alternative would develop the same Project site as the proposed Project, and the roadway and infrastructure improvements included in the proposed Project would be implemented by the Reduced Project Alternative and would be constructed consistent with City standards and regulations. Consistent with the proposed Project, the Reduced Project Alternative would comply with applicable CBC, CFC, RCFD, and City Municipal Code regulations and would include ignition-resistant materials, fire-safe fuel breaks, and fuel modification zones. As with the proposed Project, the Reduced Project Alternative would implement **RCM TRA-1, RCMs PS-1** and **PS-2, MM FIRE-1,** and **RCMs FIRE-1** and **FIRE-2** to reduce potential impacts related to emergency access and evacuation and fire protection. Specifically, **RCM FIRE-2** would require implementation of a Project-specific FPP, similar to the proposed Project. As such, consistent with the proposed Project, the Reduced Project Alternative would result in **less than significant** impacts related to wildfire, and no mitigation measures are required. The level of impact associated with this issue would remain the same under the Reduced Project Alternative compared to the proposed Project.

5.5.3 Summary of Reduced Project Alternative

As discussed above, the Reduced Project Alternative would result in the development of a single warehouse building totaling 500,225 square feet. This represents a reduction in development of 500,226 square feet, or approximately 50 percent, compared to the proposed Project. The reduced development under this alternative would proportionally correlate with a reduction in Project-generated trips, emission of air pollutants and GHGs during construction and operation, consumption of energy and utilities during construction and operation, construction and operational noise, and demand on public services and providers during operation when compared to the proposed Project. Although reduced, based on the scale of the Reduced Project Alternative, air quality and GHG emissions associated with implementation of the Reduced Project Alternative would remain significant and unavoidable.

Development under this alternative would result in earth disturbance, removal of existing vegetation, and alteration of the Project site similar to what is planned under the proposed Project. With adherence to standard City codes, regulations, standards, and/or Project-specific mitigation, it is reasonable that land-based impacts (agricultural, biological, cultural resources, geology and soils, hazards, hydrology and water quality, mineral resources, tribal cultural resources, wildfire, etc.) would have impacts similar to those associated with development of the proposed Project. Reductions in the

demand for public services and utilities would occur, and, like the proposed Project, impacts related to the provision of public services and utilities would remain less than significant. Similarly, impacts related to energy, population and housing, and recreation would remain less than significant under this alternative. Therefore, the level of potential impacts resulting from development of the Reduced Project Alternative would remain the same as with the proposed Project.

Due to the similarity in the development type, design, use, and location to the proposed Project, this alternative satisfies the primary Project objectives. However, because development under this alternative would be reduced by approximately 50 percent, this alternative would not satisfy the Project objectives to the same degree as the proposed Project. Furthermore, the benefits of new employment opportunities, positive revenues to the City, etc., would not be realized to the same extent under this alternative compared to the proposed Project due to the reduced development size.

5.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The following discussion compares the impacts of each alternative with the impacts of the proposed Project and discusses how the alternatives would achieve the Project objectives. Table 5.E: Project Alternatives' Ability to Meet the Project Objectives provides a comparison of how the proposed Project and alternatives would achieve the Project objectives, and Table 5.F: Proposed Project and Project Alternatives Impact Comparison compares the impacts of the alternatives with those of the proposed Project and identifies whether the alternative results in (1) a lesser impact than the proposed Project; (2) a greater impact than the proposed Project; or (3) a similar impact as the proposed Project.

The No Project/Buildout of Existing Land Use Alternative would increase the daily number of vehicle trips to and from the Project site, generation of NO_X emissions during operation, and overall generation of GHGs. As such, the No Project/Buildout of Existing Land Use Alternative would not reduce or avoid the significant and unavoidable impacts associated with the proposed Project.

While the No Project/No Development Alternative would avoid the environmental impacts associated with the proposed Project and would negate the need for mitigation, due to the limited amount of land available for industrial development in the region, the city continues to attract developers seeking to build industrial land uses in the city, and it is not reasonable to expect the Project site would remain vacant in perpetuity. Furthermore, the No Project/No Development Alternative would not achieve any of the Project objectives.

CEQA Guidelines Section 15126.6(e)(2) states that "If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." As detailed in Table 5.F, the Reduced Project Alternative would reduce the daily number of vehicle trips to and from the Project site, generation of NO_X emissions during operation, and overall generation of GHGs. However, based on the scale of the Reduced Project Alternative, emissions would also exceed applicable significance thresholds. The majority of the Project's operational-source NO_X emissions are generated by passenger cars and trucks. Neither the Project Applicant nor the City has regulatory authority to control tailpipe emissions. Therefore, the air quality and GHG impacts would remain significant and unavoidable. Nevertheless, the Reduced Project Alternative would contribute less to the significant and unavoidable air quality and GHG impacts than

the proposed Project. Overall, impacts associated with the development of the Reduced Project Alternative would be relatively less than the impacts identified for the proposed Project with respect to air quality and GHG emissions. Accordingly, the Reduced Project Alternative is considered the environmentally superior alternative.

The Reduced Project Alternative would result in the development of an industrial warehouse building consistent with the land use designation for the Project site and, therefore, would satisfy all of the Project objectives. However, because development under the Reduced Project Alternative would be reduced by approximately 50 percent, this alternative would not satisfy the Project objectives to the same degree as the proposed Project. Furthermore, the benefits of new employment opportunities, positive revenues to the City, etc., would not be realized to the same extent under this alternative compared to the proposed Project due to the reduced development size.

Table 5.E: Project Alternatives' Ability to Meet the Project Objectives

Project Objective	Proposed Project	No Project/No Development Alternative (Alternative 1)	No Project/ Buildout of Existing Land Use Alternative (Alternative 2)	Reduced Project Alternative (Alternative 3)
Embrace flexible and diverse industrial land uses that foster economic development opportunities for the City of Lake Elsinore and surrounding areas near I-15.	Yes	No	Yes	Yes
Provide local, well-paying jobs to residents that may otherwise travel out of the region for employment.	Yes	No	Yes	Yes
Provide new economic development that is consistent with the City's General Plan.	Yes	No	Yes	Yes
Facilitate the construction of utilities, roads, and other major infrastructure that are sufficiently sized to adequately serve the Project site and vicinity, as planned by the City's General Plan.	Yes	No	Yes	Yes
Enhance streetscapes and provide buffers between the planned land uses.	Yes	No	Yes	Yes
Provide for the conservation and restoration of over 33 acres of land.	Yes	No	Yes	Yes
Incorporate "Green" and sustainable practices, as practicable, in developing buildings and infrastructure.	Yes	No	Yes	Yes
Maximize the use of native plant materials/species in the Project landscaping, especially in areas located in proximity to preserved native habitat.	Yes	No	Yes	Yes

Source: Compiled by LSA (2025).

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
3.1: Aesthetics				
Threshold 3.1.1: Would the project have a substantial adverse effect on a scenic vista?	LTS	NI <	LTS =	LTS =
Threshold 3.1.2: Would the project substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?	LTS	NI <	LTS =	LTS =
Threshold 3.1.3: Would the project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	NI <	LTS =	LTS =
Threshold 3.1.4: Would the project create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	LTSM	NI <	LTSM =	LTSM =
3.2: Agriculture and Forestry Resources				
Threshold 3.2.1: Would the project 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?	NI	NI =	NI =	NI =
Threshold 3.2.2: Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?	NI	NI =	NI =	NI =
Threshold 3.2.3: Would the project 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))?	NI	NI =	NI =	NI =
Threshold 3.2.4: Would the project result in the loss of forest land or conversion of forest land to non-forest use?	NI	NI =	NI =	NI =
Threshold 3.2.5: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	NI	NI =	NI =	NI =
3.3: Air Quality				
Threshold 3.3.1: Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?	SU	NI <	SU >	SU <
Threshold 3.3.2: Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard?	SU	NI <	SU >	SU <

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
Threshold 3.3.3: Would the proposed project expose sensitive receptors to substantial pollutant concentrations?	LTS	NI <	LTS =	LTS =
Threshold 3.3.4: Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	NI <	LTS =	LTS =
3.4: Biological Resources				
Threshold 3.4.1: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.4.2: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.4.3: Would the project 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?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.4.4: Would the project 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?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.4.5: Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.4.6: Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	LTSM	NI <	LTSM =	LTSM =
3.5: Cultural Resources				
Threshold 3.5.1: Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	NI	NI =	NI =	NI =
Threshold 3.5.2: Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.5.3: Would the project disturb any human remains, including those interred outside of dedicated cemeteries?	LTS	NI <	LTS =	LTS =
3.6: Energy				
Threshold 3.6.1: Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	LTS	NI <	LTS >	LTS <

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
Threshold 3.6.2: Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	NI <	LTS =	LTS =
3.7: Geology and Soils				
Threshold 3.7.1: Would the project 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 known fault? (Refer to Division of Mines and Geology Special Publication 42) (ii) Strong seismic ground shaking? (iii) Seismic-related ground failure, including liquefaction? (iv) Landslides?	LSTM	NI <	LSTM =	LSTM =
Threshold 3.7.2: Would the project result in substantial soil erosion or the loss of topsoil?	LTS	NI <	LTS =	LTS =
Threshold 3.7.3: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse?	LSTM	NI <	LSTM =	LSTM =
Threshold 3.7.4: Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating direct or indirect substantial risks to life or property?	LSTM	NI <	LSTM =	LSTM =
Threshold 3.7.5: Would the project 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?	NI	NI =	NI =	NI =
Threshold 3.7.6: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTSM	NI <	LTSM =	LTSM =
3.8: Greenhouse Gas Emissions				
Threshold 3.8.1: Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	SU	NI <	SU >	SU <
Threshold 3.8.2: Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	SU	NI <	SU >	SU <
3.9: Hazards and Hazardous Materials				
Threshold 3.9.1: Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	NI <	LTS =	LTS =
Threshold 3.9.2: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LTSM	NI <	LTSM =	LTSM =

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
Threshold 3.9.3: Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	NI <	LTS =	LTS =
Threshold 3.9.4: Would the project 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?	NI	NI =	NI =	NI =
Threshold 3.9.5: Would the project, 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?	NI	NI =	NI =	NI =
Threshold 3.9.6: Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTS	NI <	LTS >	LTS =
Threshold 3.9.7: Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	LTSM	NI <	LTSM >	LTSM =
3.10: Hydrology and Water Quality				
Threshold 3.10.1: Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	LTS	NI <	LTS =	LTS =
Threshold 3.10.2: Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	NI <	LTS =	LTS =
Threshold 3.10.3: Would the project 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; (ii) Substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site; (iii) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or (iv) Impede or redirect flood flows?	LTS	NI <	LTS =	LTS =
Threshold 3.10.4: Would the project in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LTS	NI <	LTS =	LTS =
Threshold 3.10.5: Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	NI <	LTS =	LTS =
3.11: Land Use and Planning				
Threshold 3.11.1: Would the project physically divide an established community?	LTS	NI <	LTS =	LTS =

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
Threshold 3.11.2: Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTSM	NI <	LTSM =	LTSM =
3.12: Mineral Resources				
Threshold 3.12.1: Would the project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?	LTS	NI <	LTS =	LTS =
Threshold 3.12.2: Would the project 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?	NI	NI =	NI =	NI =
3.13: Noise and Vibration				
Threshold 3.13.1: Would the project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	NI <	LTS >	LTS <
Threshold 3.13.2: Would the project result in the generation of excessive groundborne vibration or groundborne noise levels?	LTS	NI <	LTS =	LTS =
Threshold 3.13.3: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in exposure of people residing or working in the project area to excessive noise levels?	LTS	NI <	LTS =	LTS =
3.14: Population and Housing				
Threshold 3.14.1: Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	NI <	LTS <	LTS <
Threshold 3.14.2: Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	NI	NI =	NI =	NI =
3.15: Public Services				
Threshold 3.15.1: 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 fire protection?	LTS	NI <	LTS >	LTS <
Threshold 3.15.2: 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 police protection?	LTS	NI <	LTS >	LTS <

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
Threshold 3.15.3: 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 schools?	LTS	NI <	LTS >	LTS <
Threshold 3.15.4: 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 parks?	LTS	NI <	LTS >	LTS <
Threshold 3.15.5: 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 other public facilities?	LTS	NI <	LTS >	LTS <
3.16: Recreation				
Threshold 3.16.1: 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?	LTS	NI <	LTS >	LTS <
Threshold 3.16.2: Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	NI	NI <	NI =	NI =
3.17: Transportation				
Threshold 3.17.1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities?	LTS	NI <	LTS =	LTS =
Threshold 3.17.2: Would the project conflict or be inconsistent with *CEQA Guidelines* section 15064.3, subdivision (b)?	LTS	NI <	LTS =	LTS =
Threshold 3.17.3: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	LTS	NI <	LTS =	LTS =
Threshold 3.17.4: Would the project result in inadequate emergency access?	LTS	NI <	LTS >	LTS =

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
3.18: Tribal Cultural Resources				
Threshold 3.18.1: 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: 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)?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.18.2: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	LTSM	NI <	LTSM =	LTSM =
3.19: Utilities and Service Systems				
Threshold 3.19.1: Would the project 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?	LTS	NI <	LTS >	LTS =
Threshold 3.19.2: Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	NI <	LTS >	LTS =
Threshold 3.19.3: Would the project 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?	LTS	NI <	LTS >	LTS =
Threshold 3.19.4: Would the project 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?	LTS	NI <	LTS >	LTS =
Threshold 3.19.5: Would the project conflict with federal, state, and local management and reduction statutes and regulations related to solid waste?	LTS	NI <	LTS =	LTS =
3.20: Wildfire				
Threshold 3.20.1: Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	NI <	LTS >	LTS =

Table 5.F: Proposed Project and Project Alternatives Impact Comparison

Environmental Impacts	Proposed Project	No Project/No Development Alternative	No Project/Buildout of Existing Land Use Alternative	Reduced Project Alternative
Threshold 3.20.2: Due to slope, prevailing winds, and other factors, would the project exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	LTSM	NI <	LTSM >	LTSM =
Threshold 3.20.3: Would the project 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?	LTSM	NI <	LTSM =	LTSM =
Threshold 3.20.4: Would the project 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?	LTSM	NI <	LTSM >	LTSM =

LTS = Less than Significant
NI = No Impact
S = Significant
SU = Significant and Unavoidable
LTSM = Less Than Significant with Mitigation
< (less than)
> (greater than)
= (equal to)

6.0 LIST OF PREPARERS

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7.0 REFERENCES

Brief for the South Coast Air Quality Management District as Amicus Curiae. 2015. *Sierra Club, Revive the San Joaquin, and League of Women Voters of Fresno v. County of Fresno and Friant Ranch, L.P.* After a Published Decision by the Court of Appeal filed May 27, 2014 (Fifth Appellate District Case No. F066798), Appeal from the Superior Court of California, County of Fresno (Case No. 11CECG00726). Page 13. April 6.

California Air Resources Board (CARB). 2000a. *Fact Sheet – California's Plan to Reduce Diesel Particulate Matter Emissions*. October.

_____. 2000b. *Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles*. October. Prepared by the Stationary Source Division and Mobile Source Control Division. Website: https://ww2.arb.ca.gov/sites/default/files/classic/diesel/documents/rrpfinal.pdf (accessed June 2025).

_____. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective* (CARB Handbook). April.

_____. 2008. *Climate Change Scoping Plan*. December. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf (accessed August 2025).

_____. 2014. *First Update to the Climate Change Scoping Plan*. May. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf (accessed August 2025).

_____. 2017b. *California's 2017 Climate Change Scoping Plan*. November. Website: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf (accessed August 2025).

_____. 2019. Truck and Bus Regulation Compliance Requirement Overview. June 18. Website: www.arb.ca.gov/msprog/onrdiesel/documents/fsregsum.pdf (accessed June 2025).

_____. 2020. *Inhalable Particulate Matter and Health ($PM_{2.5}$ and PM_{10})*. Website: ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health (accessed June 2025).

_____. 2021. 2020 Mobile Source Strategy. October. Website: www.arb.ca.gov/sites/default/files/2021-12/2020_Mobile_Source_Strategy.pdf (accessed June 2025).

_____. 2022. *2022 Scoping Plan*. November 16. Website: https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf (accessed June 2025).

_____. 2024a. A*ssembly Bill 32 Greenhouse Gas Emissions Inventory for 2000-2022 – by Gas*.

_____. 2024b. *California Greenhouse Gas Emissions for 2000 to 2022, Trends of Emissions and Other Indicators Report*. Website: https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf (accessed June 2025).

_____. n.d.-a. CARB Tractor-Trailer Greenhouse Gas Regulation. Website: www.arb.ca.gov/our-work/programs/ttghg (accessed June 2025).

_____. n.d.-b. MSEI – Modeling Tools, Emissions Factor Model, Version 2021 (EMFAC2021). Website: www.arb.ca.gov/our-work/programs/mobile-source-emissions-inventory/msei-modeling-tools (accessed June 2025).

_____. n.d.-c. Speciation Profiles Used in ARB Modeling. Website: www.arb.ca.gov/ei/speciate/speciate.htm (accessed June 2025).

California Board of Forestry and Fire Protection. 2019. Frequently Asked Questions About: 2020 Fire Hazard Severity Zones. November. Website: https://bof.fire.ca.gov/media/ttpi3n3m/full-14-b-vhfhsz-frequently-asked-questions.pdf (accessed June 24, 2025).

California Board of Forestry and Fire Protection and California Department of Forestry and Fire Protection. 2018. *2024 Strategic Fire Plan for California.* August 22.

California Department of Conservation (DOC). 2004. *A Guide to the Farmland Mapping and Monitoring Program*. Page 6. Website: https://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/Archive/fmmp_guide_2004.pdf (accessed July 11, 2024).

_____. n.d.-a. California Geological Survey, Minerals. Website: https://www.conservation.ca.gov/cgs/minerals (accessed July 16, 2024).

_____. n.d.-b. California Geological Survey, Mineral Land Classification. Website: https://maps.conservation.ca.gov/cgs/minerals/?page=Mineral-Land-Classification&views=About---MLC-Reports (accessed October 3, 2025).

_____. n.d.-c. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/dlrp/ciff/app/ (accessed July 11, 2024).

_____. n.d.-d. Mines and Mineral Resources, Mines Online. Website: https://maps.conservation.ca.gov/mol/index.html (accessed July 16, 2024).

_____. n.d.-e. Table A-25 Riverside County 2016–2018 Land Use Conversion. Division of Land Resource Protection. Website: https://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx. Accessed July 11, 2024.

California Department of Education. n.d. Data Quest, 2023-2024 Enrollment by Grade, Alberhill Elementary Report. Website: https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=33751760139790&agglevel=School&year=2023-24&ro=y (accessed September 4, 2024

California Department of Finance, Demographic Research Unit. 2021. *Report E-4, Population Estimates for Cities, Counties, and the State, 2011-2020, with 2010 Benchmark.* May 7.

California Department of Fish and Wildlife (CDFW). 2023. Special Animals List. Periodic publication. Sacramento, California. Page 72. October. Website: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline (accessed October 2023).

California Department of Forestry and Fire Protection (CAL FIRE). 2017. *Fire and Resource Assessment Program, California's Forests and Rangelands 2017 Assessment.* Page 286. Website: https://frap.fire.ca.gov/media/4babn5pw/assessment2017.pdf (accessed July 11, 2024).

_____. 2025. Fire Hazard Severity Zones. Website: https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones (accessed June 24, 2025).

_____. n.d.-a. Airport Fire. Website: https://www.fire.ca.gov/incidents/2024/9/9/airport-fire (accessed May 19, 2025).

_____. n.d.-b. Crump Fire. Website: https://www.fire.ca.gov/incidents/2025/9/6/crump-fire (accessed September 8, 2025).

_____. n.d.-c. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/ (accessedJuly26,2025).

_____. n.d.-d. Ready, Set, Go! Website: https://readyforwildfire.org/prepare-for-wildfire/ (accessed May 19, 2025).

_____. n.d.-e. State Responsibility Area Five-Year Review. Website: https://calfire-umb05. azure websites.net/ (accessed June 24, 2025).

California Department of Justice, Attorney General. 2022. *Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act.* September. Website: https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf (accessed October 30, 2025).

California Department of Transportation (Caltrans). 2000. *Transportation and Construction Vibration Guidance Manual.* April.

_____. 2002. *Guide for the Preparation of Traffic Impact Studies*. December.

_____. 2013. *Technical Noise Supplement - A Technical Supplement to the Traffic Noise Analysis Protocol.* September.

_____. 2015. List of Eligible and Officially Designated State Scenic Highways. Last modified July 2019. Website: https://dot.ca.gov/-/media/dot-media/programs/design/documents/desig-and-eligible-aug2019_a11y.xlsx (accessed: March 7, 2025).

_____. 2020. *Traffic Noise Analysis Protocol for New Highway Construction, Reconstruction, and Retrofit Barrier Projects.* April.

California Department of Water Resources (DWR). 2003. *Guidebook for Implementation of SB 610 and SB 221 to Assist Water Suppliers, Cities, and Counties in Integrating Water and Land Use Planning.* October 10. Website: https://cawaterlibrary.net/document/guidebook-for-implementation-of-sb-610-and-sb-221-to-assist-water-suppliers-cities-and-counties-in-integrating-water-and-land-use-planning/ (accessed August 21, 2025).

_____. 2006. Elsinore Groundwater Basin Bulletin 118. January 20.

_____. n.d.-a. Groundwater Basin Boundary Assessment Tool. Website: https://gis.water.ca.gov/app/bbat/ (accessed December 2024).

_____. n.d.-b. Division of Safety of Dams. *Dam Breach Inundation Map Web Publisher.* Website: https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2 (accessed December 2024).

California Employment Development Department. Labor Force and Unemployment Rate for Cities and Census Designated Places. Website: https://labormarketinfo.edd.ca.gov/data/labor-force-and-unemployment-for-cities-and-census-areas.html#CCD (accessed March 2025).

California Energy Commission (CEC). 2015. Medium and Heavy-Duty Truck Prices and Fuel Economy 2013–2026. Website: efiling.energy.ca.gov/getdocument.aspx?tn=206180 (accessed June 2025).

_____. 2018. *California Energy Demand, 2018–2030 Revised Forecast*. Publication Number: CEC-200-2018-002-CMF. February. Website: https://efiling.energy.ca.gov/getdocument.aspx?tn=223244 (accessed June 2025).

_____. 2022a. Electricity Consumption by County. Website: https://ecdms.energy.ca.gov/elecbycounty.aspx (accessed December 2024).

_____. 2022b. Gas Consumption by County. Website: https://ecdms.energy.ca.gov/gasbycounty.aspx (accessed December 2024)

_____. 2022c. Electricity Consumption by Entity. Website: https://ecdms.energy.ca.gov/elecbyutil.aspx (accessed December 2024).

_____. 2022d. Gas Consumption by Entity. Website: https://ecdms.energy.ca.gov/gasbyutil.aspx (accessed December 2024)

_____. 2022e. 2022 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2022-total-system-electric-generation (accessed December 2024).

_____. 2024a. 2023 Total System Electric Generation. Website: https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2023-total-system-electric-generation (accessed June 2025).

_____. 2024b. *2024 Integrated Energy Policy Report Update.* Docket Number 24-IEPR-01.

_____. 2024c. Electricity Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/elecbycounty.aspx and http://www.ecdms.energy.ca.gov/elecbyutil.aspx (accessed June 2025).

_____. 2024d. Gas Consumption by County and Entity. Website: http://www.ecdms.energy.ca.gov/gasbycounty.aspx and http://www.ecdms.energy.ca.gov/gasbyutil.aspx (accessed June 2025).

_____. n.d. Supply and Demand of Natural Gas in California. Website: https://www.energy.ca.gov/data-reports/energy-almanac/californias-natural-gas-market/supply-and-demand-natural-gas-california (accessed December 2024).

California Environmental Protection Agency (CalEPA). n.d. *Hazardous Materials Business Plan.* Website: https://calepa.ca.gov/hazardous-materials-business-plan-program/ (accessed July 29, 2024).

California Environmental Protection Agency (CalEPA) Office of Environmental Health Hazard Assessment (OEHHA). 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. March. Website: https://oehha.ca.gov/air/air-toxics-hot-spots (accessed June 2025).

California Governor's Office of Land Use and Climate Innovation. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA.* April.

California Inter-Utility Coordinating Committee. 2018. *California Temporary Traffic Control Handbook, 7th Edition.* May.

California Legislative Information. 2021. Fish and Game Code of California. Website: http://leginfo.legislature.ca.gov/faces/codesTOCSelected.xhtml?tocCode=FGC&tocTitle=+Fish+and+Game+Code+-+FGC (accessed October 2023).

California Office of the Attorney General. 2022. *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*. October.

California Office of Historic Preservation. 2011. *Technical Assistance Series #6 California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register).* Website: https://ohp.parks.ca.gov/pages/1069/files/technical%20assistance%20bulletin%206%202011%20update.pdf (accessed July 26, 2024).

_____. n.d. California Register of Historical Resources. Website: https://ohp.parks.ca.gov/?page_id=21238 (accessed August 14, 2025).

California Public Utilities Commission (CPUC). 2019. Renewables Portfolio Standard Program. Website: cpuc.ca.gov/rps (accessed April 2025).

_____. n.d. *Zero Net Energy*. Website: https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/demand-side-management/energy-efficiency/zero-net-energy (accessed August 2025).

Carollo Engineers, Inc. 2025. *Baker Street Water Supply Assessment.* April.

City of Lake Elsinore. 2008. Parks and Recreation Master Plan 2008–2030. Website: https://www.lake-elsinore.org/DocumentCenter/View/3149/2009ParksandRecreationMast (accessed July 11, 2024).

_____. 2011. *General Plan Update Draft Program EIR.* August. Certified December 2011.

_____. 2011. *City of Lake Elsinore General Plan Environmental Impact Report.* December 13.

_____. 2011. *City of Lake Elsinore Climate Action Plan.* December 13. Website: https://www.lake-elsinore.org/DocumentCenter/View/4213/Climate-Action-Plan---Approved-December-13-2011-PDF?bidId= (accessed June 2025).

_____. 2017. *Local Hazard Mitigation Plan.* June.

_____. 2019a. Active LE. October.

_____. 2019b. Nichols Ranch Specific Plan (PA 2017-29). Approved June 11. Page 4.14-2. Website: www.lake-elsinore.org/398/Nichols-RanchSpecific-Plan-PA-2017-29-- (accessed September 5, 2024).

_____. 2020. *Traffic Impact Analysis Preparation Guide.* June 23. Revised November 14, 2022. Website: https://www.lake-elsinore.org/DocumentCenter/View/2373/Traffic-Impact-Analysis-Preparation-Guide-PDF?bidId= (accessed August 21, 2025).

_____. 2022. Lake Elsinore General Plan. Section 6.0, Housing Element 2021 to 2029. August 23.

_____. 2023. “Good Neighbor Policy” for Warehousing, Logistics, and Distribution Uses, Policy No. 400-16. Effective April 25, 2023.

_____. 2024. *Lake Elsinore Municipal Code.* May 28.

_____. n.d.-a. Emergency Preparedness. Website: https://www.lake-elsinore.org/208/Emergency-Preparedness (accessed July 27, 2024).

_____. n.d.-b. General Plan Update Existing Conditions Atlas, Public Services and Utilities. Page PS-2. Website: https://www.lake-elsinore.org/DocumentCenter/View/3596/Lake-Elsinore-Existing-Conditions-Atlas---Final (accessed September 5, 2024).

_____. n.d.-c. Lake Elsinore Municipal Code. Title 17: Zoning. Accessed July 2024.

_____. n.d.-d. Parks & Facilities. Website: https://www.lake-elsinore.org/366/Parks-Facilities (accessed July 11, 2024).

_____. n.d.-e. Parks Locator Map. Website: https://www.lake-elsinore.org/DocumentCenter/View/2435/Park-Location-Map-PDF?bidId= (accessed July 11, 2024).

_____. n.d.-f. Traffic Engineering, Truck Routes. Website: https://www.lake-elsinore.org/Quick Links.aspx?CID=51 (accessed January 2025).

City of Perris. 2010. Appendix A, Proposed Perris Valley Airport Land Use Compatibility Plan. July.

City of Riverside. 2012. Riverside General Plan 2025, Open Space and Conservation Element. Website: https://riversideca.gov/cedd/sites/riversideca.gov.cedd/files/pdf/planning/general-plan/12_Open_Space_and_Conservation_Element.pdf (accessed August 18, 2025).

Colton, Roger D., and Sheehan Fisher. 2014. *Assessing Rooftop Solar PV Glare in Dense Urban Residential Neighborhoods: Determining Whether and How Much of a Problem*. November. Website: http://www.fsconline.com/downloads/Papers/2014%2011%20Solar_Glare.pdf (accessed May 9, 2025).

County of Riverside. 2015. County of Riverside General Plan, Chapter 5, Multipurpose Open Space Element. December 8.

_____. 2020. *Transportation Analysis Guidelines for Level of Service and Vehicle Miles Traveled for County of Riverside.* December.

_____. 2023. Riverside County General Plan, Elsinore Area Plan. Table 2 Statistical Summary of Elsinore Area Plan. December 12. Website: https://planning.rctlma.org/sites/g/files/aldnop416/files/2024-05/ELAP%2012-12-23_0.pdf.(accessed July 16, 2024).

_____. n.d.-a. *General Plan, Final Program, Environmental Impact Report,* Volume 1. Website: https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i#4.11 (accessed July 26, 2024).

_____. n.d.-b. Riverside County General Plan EIR. Volume I, Section 4.0, Impacts and Mitigation Measures, Section 4.15.1, Fire Protection. Website: https://planning.rctlma.org/general-plan-environmental-impact-report-volume-i#4.15.1 (accessed September 4, 2024).

_____. n.d.-c. Riverside County General Plan Multipurpose Open Space Element. Pages OS-37 through OS-39. Website: https://planning.rctlma.org/Portals/14/genplan/general_Plan_2017/

elements/OCT17/Ch05_MOSE_120815.pdf?ver=2017-10-11-102103-833 (accessed July 16, 2024).

County of Riverside, Agricultural Commissioner's Office. n.d. *Riverside County Agricultural Production Report 2022*. Page 3 of pdf. Website: https://rivcoawm.org/sites/g/files/aldnop221/files/2023-11/2022%20Crop%20Report.pdf (accessed July 11, 2024).

County of Riverside, Department of Environmental Health. 2023. *Hazardous Materials.* Website: https://rivcoeh.org/hazardous-materials (accessed August 10, 2023).

CRM TECH. 2024a. *Historical/Archaeological Resources Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California*. January 18. Appendix E-1 (confidential: not for public distribution).

CRM TECH. 2024b. *Paleontological Resources Assessment Report, Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* January 18. Revised August 15, 2024. Appendix G-2.

_____. 2025. *Addendum to Historical/Archaeological and Paleontological Resources Studies, Off-site Infrastructure Improvements for Baker Industrial Project, City of Lake Elsinore, Riverside County, California.* May 28. Appendix G-3.

Development Planning & Financing Group, LLC (DPFG). 2024. *Baker and Pierce Street Development – Executive Summary of Economic Benefit Analysis, Riverside Legacy IV Nichols Road, LLC.* January 19.

Dudek. 2025. *Fire Protection Plan Baker Industrial Project.* November.

Elsinore Valley Municipal Water District (EVMWD). 2005. Groundwater Management Plan.

_____. 2018. Elsinore Valley Municipal Water District Sewer System Management Plan. October. Revised 2022.

_____. 2021. *Final 2020 Urban Water Management Plan.* June.

_____. 2023. 2023 Water Shortage Contingency Plan. November.

_____. n.d. EVMWD Undergoes Regional Water Reclamation Facility Expansion. June 30, 2023. Website: https://evmwd.com/evmwd-undergoes-regional-water-reclamation-facility-expansion/ (accessed December 2024).

EnviroApplications, Inc. 2023. *Phase I Environmental Site Assessment Report for Proposed Baker Industrial, Vacant Property, Baker Street & Pierce Street, Lake Elsinore, Riverside County, CA 92530*. August 4.

Environmental Protection Agency Office of Noise Abatement and Control. 1974. *Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety.* EPA/ONAC 550/9/74-004. March.

EPD Solutions, Inc. 2023. *Scoping Agreement for Traffic Impact Study, Case No. PA-2020-103, Baker Lake Elsinore.* December 22. Revised March 22, 2024.

_____. 2024a. *Baker Lake Elsinore Vehicle Miles Traveled (VMT) Screening Analysis Memorandum.*

_____. 2024b. *Parking Demand Analysis for the Proposed Baker Street Industrial Project.* May 22.

_____. 2025. *Baker Street Warehouse Project Visual Impact Assessment.* February.

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (FIRM) No. 06065C2028G. August 28.

Federal Interagency Committee on Noise. 1992. *Federal Agency Review of Selected Airport Noise Analysis Issues.* August.

Federal Transit Administration (FTA). 2018. *Transit Noise and Vibration Impact Assessment Manual.* September.

Glenn Lukos Associates, Inc. 2024. *Determination of Biologically Equivalent or Superior Preservation (DBESP) Analysis for Impacts to MSHCP Riparian/Riverine Areas and Vernal Pools, and Narrow Endemic/Criteria Area Plants for the Baker Industrial Project.* February 28. Revised March 6, 2025, May 14, 2025, and July 3, 2025 (Appendix D-2).

_____. 2025. *Biological Technical Report for the Baker Industrial Project, City of Lake Elsinore, California*. September 2 (Appendix D-1).

KWC Engineers. 2023. *Project-Specific Water Quality Management Plan, Baker Industrial*. August 14. Revised March 11, 2025.

_____. 2024. *Preliminary Drainage Report.* December. Revised June 2025.

Lake Elsinore Unified School District. n.d. Lake Elsinore USD SchoolSite Locator. Website: https://www.schoolsitelocator.com/apps/lakeelsinore/ (accessed July 27, 2024).

LGC Geotechnical, Inc. 2024. *Preliminary Geotechnical Subsurface Evaluation and Recommendations, Proposed Approximate 65-Acre Industrial Development, Baker Street, Lake Elsinore, California.* January 31.

National Fire Protection Association. n.d. NFPA 1710. Website: https://www.nfpa.org/codes-and-standards/ nfpa-1710-standard-development/1710 (accessed September 6, 2024).

National Fire Sprinkler Association. 2022. What is Conflagration? Understand This Growing Concern in Fire Protection. October 25. Website: https://nfsa.org/2022/10/25/what-is-conflagration-a-growing-concern/ (accessed June 26, 2025).

National Highway Traffic Safety Administration (NHTSA). 2022. Corporate Average Fuel Economy Standards for Model Years 2024–2026 Passenger Cars and Light Trucks. May 2. Website:

https://www.govinfo.gov/content/pkg/FR-2022-05-02/pdf/2022-07200.pdf (accessed August 2025).

_____. 2024. *Corporate Average Fuel Economy Standards for Passenger Cars and Light Trucks for Model Years 2027 and Beyond and Fuel Efficiency Standards for Heavy-Duty Pickup Trucks and Vans for Model Years 2030 and Beyond*. June 24. Website: https://www.federalregister.gov/documents/2024/06/24/2024-12864/corporate-average-fuel-economy-standards-for-passenger-cars-and-light-trucks-for-model-years-2027 (accessed September 2025).

National Park Service (NPS). 1995. *National Register Bulletin: How to Apply the National Register Criteria for Evaluation.* Website: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf (accessed August 14, 2025).

Office of Environmental Health Hazard Assessment (OEHHA). 2001. *Health Effects of Diesel Exhaust.* May 21. Website: oehha.ca.gov/air/health-effects-diesel-exhaust (accessed June 2025).

Pray, Richard. *2024 National Construction Estimator.* Carlsbad: Craftsman Book Company.

Propper, Ralph, et al. 2015. Ambient and Emission Trends of Toxic Air Contaminants in California. *American Chemical Society: Environmental Science & Technology*. Website: https://pubs.acs.org/doi/pdf/10.1021/acs.est.5b02766?ref=article_openPDF (accessed June 2025).

Riverside County Emergency Management Department. 2023. County of Riverside Operational Area Multi-Jurisdictional Local Hazard Mitigation Plan. April. Updated 2025.

Riverside County Fire Department (RCFD). 2016. Riverside County Fire Standards of Cover, Chapter V, Response Time, Workload, and Reliability Analysis. Page 120-122. March. Website: https://www.rvcfire.org/pdf/ strategic-planning/Standards%20of%20Cover.pdf?v=6488 (accessed September 5, 2024).

_____. n.d.-a. Strategic Plan 2009-2029. Website: https://www.rvcfire.org/pdf/ strategic-planning/StrategicPlan2009.pdf?v=4507 (accessed September 5, 2024).

_____. n.d.-b. Riverside County Fire Standards of Cover, Chapter V. Response Time, Workload, and Reliability Analysis. Page 120-122. Website: https://www.rvcfire.org/pdf/strategic-planning/Standards%20of%20Cover.pdf?v=6488 (accessed September 5, 2024).

_____. n.d.-c. Riverside County Fire Stations. Website: https://www.rvcfire.org/resources/fire-stations (accessed June 25, 2025).

Riverside County Flood Control District. 2012. Low Impact Development: Guidance and Standards for Transportation Projects for the Santa Ana Region Riverside County Co-Permittees. October. Website: https://content.rcflood.org/downloads/NPDES/Documents/SA_WQMP/EXHIBIT%20D.pdf (accessed June 26, 2025).

_____. 2015. Middle Santa Ana River Watershed Fact Sheet. April 15.

Riverside Legacy IV Nichols Road, LLC. 2024. *Baker Street, Warehouse Project (PA-2020-103) Good Neighbor Policy Consistency Memo.* September 19. (Appendix K).

Riverside County Transportation and Land Management Agency. 2004. *Western Riverside County Multiple Species Habitat Conservation Plan.* Section 6.1.2. Website: https://rctlma.org/western-riverside-county-multiple-species-habitat-conservation-plan-mshcp-1 (accessed September 2025).

Riverside County Waste Resources Management District. 1996. Countywide Integrated Waste Management Plan. September.

Riverside Transit Agency. 2025. Route 8, Lake Elsinore – Wildomar Loop. January 12.

Santa Ana Regional Water Quality Control Board (RWQCB). 1995. *The Water Quality Control Plan (Basin Plan) for the Santa Ana River Basin,* Chapter 1, Introduction. January 24. Updated June 2019 to include approved amendments.

_____. 2010. *National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County Within the Santa Ana Region, Order No. R8-2010-0033, NPDES No. CAS 618033 as amended by Order No. R8-2013-0024.* January 29. Effective January 29, 2010.

_____. 2020. *General Waste Discharge Requirements Permit for Discharges to Surface Waters That Pose an Insignificant (de minimis) Threat to Water Quality, Order No. R8-2020-0006, NPDES No. CAG998001.* June 19. Effective July 1, 2020.

South Coast Air Quality Management District (SCAQMD). 1993. *CEQA Air Quality Handbook.*

_____. 2002. Mobile Source Toxics Analysis. Website: www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis (accessed June 2025).

_____. 2008a. *Final Localized Significance Threshold Methodology.* July. Website: www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed June 2025).

_____. 2008b. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans.* Website: https://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf (accessed August 2025).

_____. 2014. National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities, Order No. WQ 2014-0057-DWQ, as amended by Order No. WQ 2015-0122-DWQ and Order No. WQ 2018-0028-DWQ, NPDES No. CAS000001. April 1. Effective July 1, 2015.

_____. 2021. *WAIRE Implementation Guidelines.* June. Website: https://www.aqmd.gov/docs/default-source/planning/fbmsm-docs/waire-implementation-guidelines.pdf#:~:text=The%20WAIRE%20Implementation%20Guidelines%20is%20a%20user%20guide,the%20document%20%28version%201.1%29%20reflects%20the%20following%20updates (accessed July 2025).

_____. 2022. *2022 Air Quality Management Plan.* Website: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2022-air-quality-management-plan/final-2022-aqmp/final-2022-aqmp.pdf?sfvrsn=10 (accessed June 2025).

_____. 2024a. *AB2588 and Rule 1402 Supplemental Guidelines*. September. Website: https://www.aqmd.gov/docs/default-source/planning/risk-assessment/forms-and-guidelines/ab-2588-supplemental-guidelines-2024.pdf?sfvrsn=6 (accessed June 2025).

_____. 2024b. *Risk Assessment Procedures for Rules 1401, 1401.1, and 212.* October 21. Website: https://www.aqmd.gov/docs/default-source/permitting/hra-procedures/hraprocedures9-0_103124.pdf?sfvrsn=8#:~:text=South%20Coast%20AQMD%20Rule%201401, Guidelines)%20for%20calculating%20health%20risks (accessed September 2025).

Southern California Association of Governments (SCAG). 2008. *Final 2008 Regional Comprehensive Plan.*

_____. 2024a. *Connect SoCal: The 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments.* Website: https://scag.ca.gov/sites/default/files/2024-05/23-2987-connect-socal-2024-final-complete-040424.pdf (accessed June 2025).

_____. 2024b. *Connect SoCal 2024 Demographics & Growth Forecast.* Website: https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf (accessed June 2025).

_____. 2024c. *Connect SoCal, A Plan for Navigating to a Brighter Future.* April 4.

_____. 2024d. *Connect SoCal, The Southern California Association of Governments' 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Technical Report*. April 4.

Southern California Edison. Schedule GS-1 General Service. Regulatory Information - Rates Pricing. Website: https://www.sce.com/regulatory/tariff-books/rates-pricing-choices (accessed June 2025)

State Water Resources Control Board. 2022. *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. WQ 2022-0057-DWQ, NPDES No. CAS000002.* September 8. Effective September 1, 2023.

_____. n.d. *California 2024 Integrated Report (303(d) List/305(b) Report).* Website: https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2024-integrated-report.html) (accessed April 2025).

United Nations Treaty Collection. n.d. *A Montreal Protocol on Substances that Deplete the Ozone Layer*. Website: https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XXVII-2-a&chapter=27&clang=_en (accessed August 2025).

United States Census Bureau. 2023. *Quick Facts Lake Elsinore city: United States*. July. Website: https://www.census.gov/quickfacts/fact/table/lakeelsinorecitycalifornia,US/PST045223 (accessed March 6, 2025).

_____. n.d.-a. 2023 Profile. Website: https://data.census.gov/ (accessed December 6, 2024).

_____. n.d.-b. Annual Estimates of the Resident Population for Incorporated Places in the United States: April 1, 2020 to July 1, 2024. Website: https://www2.census.gov/programs-surveys/popest/tables/2020-2024/cities/totals/SUB-IP-EST2024-POP-06.xlsx (accessed December 6, 2024).

_____. n.d.-c. Age and Sex. Website: https://data.census.gov/table/ACSST1Y2023.S0101?g=160XX00US0639486 (accessed December 13, 2024.)

United States Department of Transportation (USDOT). 2025. Table 4-23: Average Fuel Efficiency of U.S. Light Duty Vehicles. Website: https://www.bts.gov/content/average-fuel-efficiency-us-light-duty-vehicles (accessed June 2025).

United States Department of Transportation, Federal Highway Administration. 1978. FHWA Highway Traffic Noise Prediction Model. December. FHWA-RD-77-108.

_____. 2000. *Highway Traffic Noise in the United States, Problem and Response.* April. p. 3.

_____. 2001. *Highway Noise Barrier Design Handbook.*

_____. 2017. *State Highway Agency Noise Policy Template.* Updated August 24, 2017.

_____. 2018. *Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 0123.* September.

United States Department of Transportation, Federal Highway Administration, Office of Environment and Planning. 2006. FHWA Roadway Construction Noise Model. January.

United States Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. 2011. *Highway Traffic Noise Analysis and Abatement Policy and Guidance.* December.

United States Energy Information Administration (EIA). 2022. California State Profile and Energy Estimates, Data. Website: www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_mg.html&sid= CA (accessed June 2025).

_____. 2024. Electricity Explained. Website: https://www.eia.gov/energyexplained/electricity/ (accessed June 2025).

United States Environmental Protection Agency (USEPA). 1979. *Noise Effects Handbook-A Desk Reference to Health and Welfare Effects of Noise.* Office of Noise Abatement and Control. EPA 550/9/82/106. October. Revised July 1981.

_____. 2024a. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2022.* Website: https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks-1990-2022 (accessed June 2025).

_____. 2024b. NAAQS Table. December 16. Website: https://www.epa.gov/criteria-air-pollutants/naaqs-table#:~:text=Secondary%20standards%20provide%20public%20welfare,be%20revised%2C%20establishing%20new%20standards (accessed July 2025).

_____. n.d. AERMOD Modeling System. Website: www.epa.gov/scram/air-quality-dispersion-modeling-preferred-and-recommended-models (accessed June 2025).

United States Fire Administration. n.d. What is the WUI? Website: https://www.usfa.fema.gov/wui/what-is-the-wui/.

United States Geological Survey. Natural Hazards. “What Should I Know about Wildfires and Debris Flows?” https://www.usgs.gov/faqs/what-should-i-know-about-wildfires-and-debris-flows?qt-news_science_products=0#qt-news_science_products (accessed May 21, 2025).

Urban Crossroads, Inc. 2025a. *Baker Lake Elsinore Air Quality Impact Analysis*. June 3.

_____. 2025b. *Baker Lake Elsinore Construction and Operational Health Risk Assessment*. June 3.

_____. 2025c. *Baker Lake Elsinore Greenhouse Gas Analysis*. June 3.

_____. 2025d. *Baker Lake Elsinore Noise and Vibration Analysis*. March 24.

_____. 2025e. *Baker Lake Elsinore Energy Tables*. June 3.

Weather Spark. 2025. *Climate and Average Weather Year Round in Lake Elsinore*. Website: https://weatherspark.com/y/1863/Average-Weather-in-Lake-Elsinore-California-United-States-Year-Round (accessed August 2025).

Weitz, Jerry. 2003. *Jobs-Housing Balance.* American Planning Association: Planning Advisory Service Report Number 516.

Western Regional Climate Center. Recent Climate in the West. Perris, California (046816) Period of Monthly Climate Summary. Website: https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?ca6816 (accessed June 2025).

Western Riverside Council of Governments (WRCOG). 2019. WRCOG SB 743 Implementation Pathway Document Package. March.

Western Riverside County Regional Conservation Authority. 2022. Habitat Conservation. Website: https://www.wrc-rca.org/habitat-conservation/ (accessed January 2, 2024).

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APPENDIX A-1

NOTICE OF PREPARATION

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NOTICE OF PREPARATION COMMENT LETTERS

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APPENDIX A-3

SCOPING MEETING PRESENTATION

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APPENDIX B

VISUAL IMPACT ASSESSMENT

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APPENDIX C-1

AIR QUALITY IMPACT ANALYSIS

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HEALTH RISK ASSESSMENT

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APPENDIX D-1

BIOLOGICAL TECHNICAL REPORT

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APPENDIX D-2

DETERMINATION OF BIOLOGICALLY EQUIVALENT OR SUPERIOR PRESERVATION (DBESP) ANALYSIS

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APPENDIX D-3

CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW) CORRESPONDENCE

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APPENDIX E-1

HISTORICAL/ARCHAEOLOGICAL RESOURCES REPORT, BAKER INDUSTRIAL PROJECT, CITY OF LAKE ELSINORE, RIVERSIDE COUNTY, CALIFORNIA

(CONFIDENTIAL – NOT FOR PUBLIC DISTRIBUTION)

(AVAILABLE FOR REVIEW AT LAKE ELSINORE CITY HALL: 130 SOUTH MAIN STREET, LAKE ELSINORE, CA 92530)

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APPENDIX E-2

HISTORICAL/ARCHAEOLOGICAL RESOURCES REPORT ADDENDUM, BAKER INDUSTRIAL PROJECT, CITY OF LAKE ELSINORE, RIVERSIDE COUNTY, CALIFORNIA

(CONFIDENTIAL – NOT FOR PUBLIC DISTRIBUTION)

(AVAILABLE FOR REVIEW AT LAKE ELSINORE CITY HALL: 130 SOUTH MAIN STREET, LAKE ELSINORE, CA 92530)

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APPENDIX F

ENERGY TABLES

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GEOTECHNICAL EVALUATION

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PALEONTOLOGICAL RESOURCES REPORT

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APPENDIX H

GREENHOUSE GAS ANALYSIS

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APPENDIX I

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APPENDIX J-1

PRELIMINARY DRAINAGE REPORT

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APPENDIX J-2

PRELIMINARY WATER QUALITY MANAGEMENT PLAN (WQMP)

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APPENDIX J-3

WATER SUPPLY ASSESSMENT

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APPENDIX K

GOOD NEIGHBOR POLICY CONSISTENCY MEMORANDUM

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APPENDIX L

NOISE AND VIBRATION ANALYSIS

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APPENDIX M

ECONOMIC BENEFIT ANALYSIS

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APPENDIX N-1

SCOPING AGREEMENT FOR TRAFFIC IMPACT STUDY

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APPENDIX N-2

VEHICLE MILES TRAVELED (VMT) SCREENING MEMORANDUM

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APPENDIX O

ELSINORE VALLEY MUNICIPAL WATER DISTRICT (EVMWD) WILL-SERVE LETTER

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APPENDIX P

FIRE PROTECTION PLAN

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