CORYDON GROUP PROJECT

CLASS 32 EXEMPTION CHECKLIST

Planning Application No. 2023-34
Industrial Design Review No. 2023-04
Conditional Use Permit No. 2023-12

Lead Agency:

City of Lake Elsinore
Community Development Department
130 S Main Street
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December 2025

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Acronym List

ADA	Americans with Disabilities Act
ADT	Average Daily Trips
AQMP	Air Quality Management Plan
AB	Assembly Bill
ADT	Average Daily Trips

AFY	Acre-Feet Yearly
AMSL	Above Mean Sea Level
APN	Assessor Parcel Number
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAP	Climate Action Plan
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CMU	Concrete Masonry Unit
CO	Carbon Monoxide
CUP	Conditional Use Permit
CWA	Clean Water Act
CY	Cubic Yards
dBA	A-weighted decibel
DIF	Development Impact Fee
EIR	Environmental Impact Report
EPA	Environmental Protection Agency
EVMWD	Elsinore Valley Municipal Water District
FAR	Floor Area Ratio
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
ft	Feet
FTA	Federal Transit Administration
GPCD	Gallons per day per capita
GHG	Greenhouse Gas
HVAC	Heating, Ventilation and Air Conditioning
I	Interstate
IDR	Industrial Design Review
ITE	Institute of Transportation Engineers
kBTU	thousand British thermal units
kWh	kilowatt-hour
lbs	pounds
LCFS	Low Carbon Fuel Standard
LED	Low Emitting Diode
LEMC	Lake Elsinore Municipal Code
LID	Low Impact Development
LOS	Level of Service
LST	Local Significance Thresholds
MBTA	Migratory Bird Treaty Act
MG	Million Gallons
mgd	million gallons per day
MLD	Most Likely Descendant

MSHCP	Multiple Species Habitat Conservation Plan
MTCO2e	metric tons carbon dioxide equivalent
NAAQS	National Ambient Air Quality Standards
NEPSSA	narrow endemic plant species
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NOx	Nitrous Oxides
OPR	Governor's Office of Planning and Research
PM	Particulate Matter
ppm	parts per million
PPV	peak particle velocity
PRC	Public Resources Code
QSD	qualified SWPPP developer
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
SCH	State Clearinghouse
SLF	Sacred Lands File
SOx	Oxides of Sulfur
SP	Specific Plan
SR	State Route
SRA	Source Receptor Area
SWPPP	Storm Water Pollution Prevention Plan
TAC	Toxic Air Contaminant
TAZ	Traffic Analysis Zone
VdB	velocity in decibels
VMT	Vehicle Miles Traveled
TIA	Traffic Impact Analysis
USACE	United States Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geologic Survey
UWMP	Urban Water Management Plan
WDRs	Waste Discharge Requirements
WQMP	Water Quality Management Plan
WRCOG	Western Riverside Council of Governments

1.0 INTRODUCTION

The applicant for the proposed Project is requesting approval from the City of Lake Elsinore to construct two industrial warehouses that would each be 24,296 square feet and have a 4,613 square-foot mezzanine. The buildings would be a maximum height of 34 feet 4 inches in height. Each building would have two 14-foot-wide roll-up dock doors. In addition, parking for 93 vehicles would be provided along with site landscaping. The Project would be accessed from Corydon Road by a proposed 30-foot-wide full-access driveway. Other improvements include installation of bioretention basins to capture, filter, and infiltrate stormwater, and half-width improvements to Corydon Road, including curb, gutter, sidewalk, and undergrounding the existing telephone/power poles and lines fronting the site. The City of Lake Elsinore is the Lead Agency for the proposed Project. The Lead Agency will utilize this document as evidence that the proposed Project qualifies for a Class 32 Infill Exemption, which is further described below.

1.1 PURPOSE OF THE NOTICE OF EXEMPTION

This Class 32 Infill Exemption has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.)
- California Code of Regulations, Title 14, Division 6, Chapter 3 (CEQA Guidelines, Sections 15000 et seq.).

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects which have been determined not to have a significant effect on the environment. This document demonstrates that the proposed Project qualifies for a CEQA Exemption as an Infill Development Project (Class 32 Exemption), consistent with the provisions of CEQA Guidelines Sections 15332 and 15300.2 and provides information for City decision-makers to find that the proposed Project is exempt under CEQA.

Pursuant to CEQA Guidelines Section 15332, the Project qualifies for a Class 32 Exemption because it is: (1) consistent with the General Plan designation and policies and zoning regulations; (2) is located within the City limits, surrounded by urban uses and is less than 5 acres in size; (3) has no value for endangered, rare or threatened species; (4) would not result in any significant effects related to traffic, noise, air quality or water quality; and (5) can be adequately served by all required utilities and public services. Additionally, this document demonstrates that the Project and its circumstances would not result in any exceptions identified in CEQA Guidelines Section 15300.2.

Existing Regulations that Reduce Potential Impacts

Throughout the analysis in this Class 32 Exemption Checklist, reference is made to requirements that are applied to all development on the basis of federal, state, or local law, which effectively reduce the potential for environmental impacts to occur. Where applicable, these existing regulations are listed to show their effect in reducing potential environmental impacts.

1.2 DOCUMENT ORGANIZATION

This Class 32 Exemption Checklist includes the flowing sections:

Section 1.0 Introduction
Provides information about CEQA, its requirements for environmental review, and explains the exemption criteria that evaluates the potential impacts of the proposed Project to the physical environment.

Section 2.0 Project Setting
Provides information about the Project's location, a description of existing site uses, and identifies the existing General Plan and zoning designations.

Section 3.0 Project Description
Includes a description of the Project's physical features, along with construction and operational activities. Describes anticipated approvals and permits needed for implementation of the proposed Project.

Section 4.0 Class 32 Infill Exemption Requirements
Provides the CEQA Guidelines detailing the types of projects exempt from CEQA review related to urban infill development and exceptions to the exemptions.

Section 5.0 Proposed Project CEQA Exemption Compliance Analysis
Evaluates the Project's potential to result in significant adverse effects to the physical environment as required by CEQA Guidelines Section 15332 and identifies applicable regulations. In addition, Section 5.0 analyzes whether the proposed Project would result in any of the exceptions in the criteria of CEQA Guidelines Section 15300.2(b)-(f) (Exceptions) to the Project.

Section 6.0 References
Includes a list of sources that were used in preparation of this CEQA document.

2.0 PROJECT SETTING

2.1 PROJECT LOCATION

The Project site is located at 32251 and 32291 Corydon Road (APNs 370-080-002 and 003) (also identified as Corydon Street by parcel mapping) in the southern portion of the City of Lake Elsinore, as shown in Figure 1, *Project Location*. Regional access to the site is provided by Interstate 15 (I-15) and the Bundy Canyon Road interchange, which is located approximately 1.8 miles east of the site. Local access to the site is provided by Bundy Canyon Road, Mission Trail, Palomar Street, and Corydon Road.

The Project site is located within the Lake Elsinore and Wildomar United States Geological Survey (USGS) 7.5' topographic quadrangles. The center point latitude and longitude for the Project site are 33° 37' 30.1211" North, 117° 17' 56.4071" West.

2.2 EXISTING PROJECT SITE

The 3.04-acre Project site is an undeveloped rectangular shaped parcel that is surrounded by chain linked fencing. The site includes disturbed areas that are dominated by non-native scattered vegetation. The site is located adjacent to undeveloped land and light industrial warehousing uses, as shown in Figure 2, *Aerial View*. The site is relatively flat with elevations ranging from 1,246 feet to 1,279 feet above mean sea level (AMSL).

2.3 EXISTING LAND USES AND REGULATORY SETTING OF THE PROJECT SITE

The Project site is located within Planning Area 3 of the East Lake Specific Plan. The Project site has a City of Lake Elsinore General Plan Land Use designation of East Lake Specific Plan and an East Lake Specific Plan designation of Action Sports, Tourism, Commercial and Recreation and has an Airport Overlay designation. The Action Sports, Tourism, Commercial and Recreation designation provides for a wide range of extreme action sports and accessory manufacturing, service and retail uses. The Airport Overlay designation provides for facilities such as warehouses, storages facilities, maintenance and repair facilities, and hangars.

2.4 SURROUNDING LAND USES

The Project site is located within an urban area. The surrounding land uses and zoning are described in Table 1.

Table 1: Surrounding Existing Land Uses and Designations

Direction	Existing Land Use	General Plan Land Use Designation	Zoning Designations
North	Light industrial / Warehousing and undeveloped parcel	Specific Plan (SP)	East Lake Specific Plan
East	Corydon Road followed by Bryant Street, undeveloped parcels, and residential	Specific Plan (SP)	East Lake Specific Plan

Direction	Existing Land Use	General Plan Land Use Designation	Zoning Designations
South	Undeveloped parcel and Corydon Road	City of Wildomar. North of Bryant Street is LI – Light Industrial. South of Bryant Street is LDR – Low Density Residential	City of Wildomar. North of Bryant Street is M-1 (Manufacturing/Industrial). South of Bryant Street is R-R (Rural Residential)
West	Undeveloped parcels	Specific Plan (SP)	East Lake Specific Plan


Lake Elsinore
Lakeland Village
Wildomar
Murrieta
15
215
0 2 4 Miles
Project Site
Skylark Airport
Lake Elsinore MX Park
Sedco Hills
Wildomar
Village Pkwy
Summerly Pl
Keview Ter
Mesa Dr
Wildomar Rd
Olive St
Vine St
Orchard St
Lemon St
Waite St
Almond St
Canyon Dr
Orange St
Cereal St
Saltbush
Como St
Stoneman St
Ontario Way
Grand Ave
Skylark Dr
Borchard Rd
Corydon
Palomar St
Cashew St
Union St
Wesley St
Sedco Heights
N
0 1,000 2,000 Feet
1" = 2,000 feet
1:24,000
Corydon Road Warehouse Project
Figure 1 - Regional Location
Map Date: 10/30/2025
Data Sources: ESRI World Street Map
RE Consulting

N

0 100 200 Feet

1" = 200 feet
1:2,400

Corydon Road Warehouse Project

Figure 2 - Aerial View

Map Date: 10/30/2025
Data Sources: ESRI World Imagery

RE Consulting

3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The proposed Project would develop the site with two industrial warehouses that would each be 24,296 square feet and have two 4,613 square-foot mezzanines. The buildings would be a maximum height of 34 feet 4 inches. Each building would have two 14-foot-wide roll-up dock doors. In addition, parking for 93 vehicles would be provided along with site landscaping. The Project would be accessed from Corydon Road by a proposed 30-foot-wide full-access driveway. Other improvements include installation of a bioretention basin to capture, filter, and infiltrate stormwater, and half-width improvements along Corydon Road that include curb, gutter, sidewalk, and undergrounding the telephone/power poles and lines fronting the site. The Project requires approval of a Conditional Use Permit (CUP) and Industrial Design Review (IDR).

The Project also proposes a Project-Related Minor Modification to the East Lake Specific Plan to reallocate approximately 50,000 square feet of the Industrial Development Target allocated from Specific Plan Area 2 to Specific Plan Area 3; and a Minor Modification to expand the Airport Overlay designation to include the existing Skylark Airport. As detailed in Section 10.4.2.2 of the East Lake Specific Plan, these Minor Modifications do not require an amendment to the Specific Plan and are processed in conjunction with implementing development projects and corresponding applications.

3.2 PROJECT FEATURES

Building Structures
The proposed Project would develop the site with two unrefrigerated warehouses that would each be 24,296 square feet and have two 4,613 square-foot mezzanines and two 14-foot-wide roll-up dock doors, as shown in Figure 3, *Conceptual Site Plan*. The buildings would have a maximum height of 34 feet 4 inches.

The buildings would be constructed with concrete masonry unit (cmu) walls and would have a modern industrial architectural style with flat roofs with parapets. Building exterior materials would be painted in shades of gray, with metal and painted cement accent panels. Windows and doors would be inset, and business signage would be provided on the south sides of the buildings, toward Corydon Road, as shown in Figures 4 and 5, *Building Elevations*. The proposed building would have a front setback of 88.6 feet, which exceeds the requirements as identified in Table 2-4 of the East Lake Specific Plan.

Off-Street Parking
The Project includes 93 total parking spaces, including 4 ADA spaces and 4 electric vehicle parking spaces. This exceeds the municipal code requirements of 1 parking space per 500 square feet, which equates to 90 total parking spaces. The Project includes both long-term (at a minimum of 5 percent of employee parking) and short-term bicycle parking (at a minimum of 5 percent of the total parking), that would be located at the front of each building toward Corydon Road.

Access and Circulation
The proposed Project would be accessed through a 30-foot-wide driveway along Corydon Road that provides direct access to parking spaces that would be adjacent to both of the proposed buildings. An interior driveway would provide circulation between the proposed buildings and would be a minimum of 26 feet wide and meet

emergency access requirements. The Project would install onsite pedestrian walkways on the site and would install offsite sidewalks along the Project frontage of Corydon Road along with landscaping.

Lighting
Outdoor lighting included as part of the Project would be typical of light industrial uses and would consist of primarily wall-mounted lighting and parking lot lighting. All the Project's outdoor lighting would be directed downward and shielded to minimize off-site spill in compliance with LEMC Section 17.112.040.

Landscaping
The proposed Project would include approximately 25,226 square feet (20% of the site) of landscaping around the proposed building, parking areas, and driveways. The majority of the landscaping would be located along the Project site frontage of Corydon Road and along the western boundary of the site, as shown on Figure 6, *Conceptual Landscaping Plan*. The landscaping would include 24-inch box trees, various 5-gallon shrubs, and ground cover per LEMC Section 17.136.100. Landscaping would be drought tolerant, in compliance with the City's landscaping regulations.

Fencing and Gates
The Project includes installation of a 6-foot-high chain linked fencing to be located along the north and eastern boundaries of the site; and 6-foot-high wrought iron fencing would be located along the western boundary of the site and southern boundary of the site along Corydon Road.

Infrastructure Improvements
The proposed Project would install new utilities on the Project site that would serve the Project and connect to existing offsite infrastructure.

Water and Sewer: The proposed Project would install onsite water lines and sewer lines that would connect to the existing 21-inch water main and 18-inch sewer main in Corydon Road.

Drainage: The proposed Project would install an onsite drainage and bioretention system to capture and treat stormwater. Stormwater on the Project site would be conveyed to landscape areas and onsite storm drains that would drain to two proposed bioretention basins that would collect, treat, and infiltrate runoff into the site soils.

Roadway Improvements: The proposed Project would remove and replace the existing roadway pavement along the street frontage of Corydon Road and would provide half-width improvements that include landscaping, sidewalk, curb, gutter, and undergrounding the telephone/power poles and lines fronting the site.

3.3 PROJECT OPERATIONS

The proposed Project would operate two industrial warehouses. No cold storage is proposed as part of this Project. Typical operational characteristics include employees traveling to and from the site, delivery of materials and supplies to the site, and truck loading and unloading. The Project Applicant states that operation of the Project would be limited to the daytime. Thus, for purposes of evaluation, the proposed development is assumed to be operational between 7:00 a.m. to 10:00 p.m., 7 days a week.

3.4 GENERAL PLAN LAND USE AND ZONING

The Project site has City of Lake Elsinore General Plan land use designation of East Lake Specific Plan and an East Lake Specific Plan designation of Action Sports, Tourism, Commercial and Recreation and an Airport Overlay designation. The Project site is located within Planning Area 3 of the East Lake Specific Plan. The Action Sports, Tourism, Commercial and Recreation designation provides for a wide range of extreme action sports and accessory manufacturing, service and retail uses. Table 2-4 of the East Lake Specific Plan details that the Action Sports, Tourism, Commercial and Recreation designation provides for a minimum lot width of 100 feet, setbacks of 15-feet from non-residential uses and a maximum building height of 45 feet.

The Airport Overlay designation provides for facilities such as warehouses, storages facilities, maintenance and repair facilities, and hangars. Table 2-11 of the East Lake Specific Plan details that the Airport Overlay Development Standards provides for setbacks of 35 feet from major and collector streets and 45 feet from urban arterials, and a maximum building height of 45 feet. As further detailed herein, the Project is consistent with the East Lake Specific Plan development standards that are applicable to the site. Thus, the proposed Project is consistent with the existing land use and zoning designations of the Project site.

3.5 PROJECT CONSTRUCTION

Construction activities for the Project would occur over one phase lasting approximately 13 months and in the following stages: (1) site preparation; (2) grading and excavation; (3) building construction; (4) paving; and (5) application of architectural coatings. The proposed grading plan estimates a cut of 1,538 cubic yards (cy) of soils and fill of 6,314 cy of soils, which would result in an import of approximately 4,776 cy. The Project would utilize construction equipment with engines meeting Tier 4 Interim standards. Table 2 details total working days for each phase of construction for analytical purposes. Construction activities would be limited to the hours allowable by LEMC Section 17.176.080, which prohibits construction activities between the hours of 7:00 p.m. and 7:00 a.m. or at any time on weekends or on holidays.

Table 2: Construction Schedule

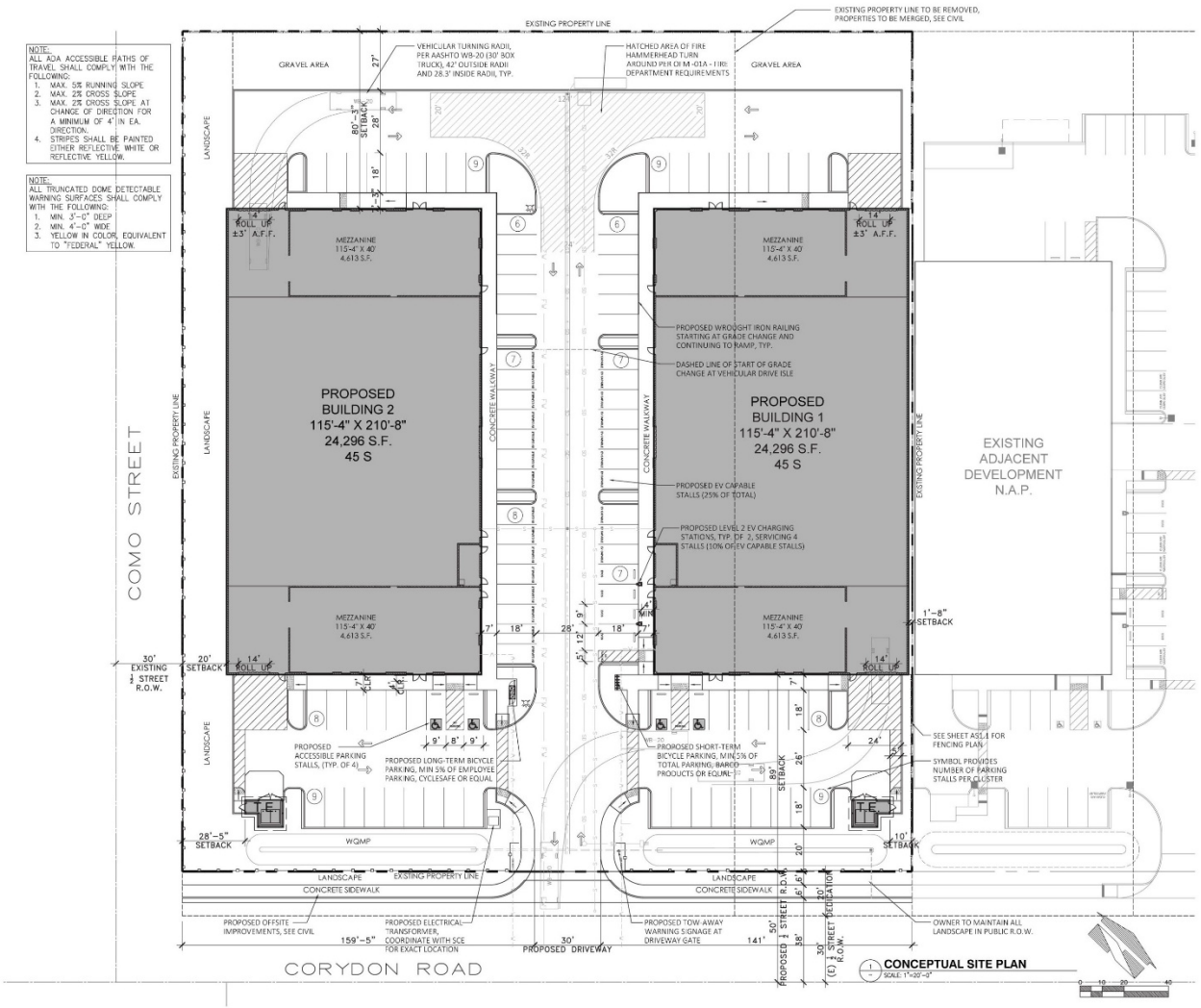
Construction Phase	Working Days	Equipment Types Used
Site Preparation	24	Graders, scrapers, tractors, loaders, backhoes
Grading	44	Graders, rubber tired dozers, tractors, loaders, backhoes
Building Construction	194	Cranes, forklifts, tractors, loaders, backhoes, generator sets, welders
Paving	19	Cement and mortar mixers, pavers, rollers, tractors, loaders, backhoes, paving equipment
Architectural Coating	19	Air compressors

3.6 DISCRETIONARY APPROVALS AND PERMITS

The following discretionary approval and permits are anticipated from the City of Lake Elsinore to be necessary for implementation of the proposed Project:

- Approval of a Conditional Use Permit (CUP) to establish and operate a two-unit industrial complex
- Approval of an Industrial Design Review (IDR) for construction of two industrial buildings

- Approval of a Minor Modification to the East Lake Specific Plan to reallocate approximately 50,000 square feet of the Industrial Development Target allocated from Specific Plan Area 2 to Specific Plan Area 3
- Approval of a Minor Modification to expand the Airport Overlay designation to include the existing Skylark Airport
- Adoption of this Class 32 Exemption with the determination that the exemption has been prepared in compliance with the requirements of CEQA
- Approvals and permits necessary to execute the proposed Project, including but not limited to, grading permit, building permit, etc.



Corydon Road Warehouse Project

Figure 3 - Conceptual Site Plan

Map Date: 10/30/2025
Data Sources: Empire Design Group, 9/26/2025

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Corydon Road Warehouse Project

Figure 4a - Building Elevations

Map Date: 10/30/2025
Data Sources: Empire Design Group, 6/2/2025

RE Consulting

Corydon Road Warehouse Project

Figure 4b - Building Elevations

Map Date: 10/30/2025
Data Sources: Empire Design Group, 6/2/2025

RE Consulting

PLANT PALETTE

TREES

BOTANIC NAME	COMMON NAME	SIZE	TYPE	QTY.	WUCOLS
Pistacia x "Red Hyde"	RED PUSH PISTACHE	24" BOX	DECIDUOUS	11	MOD
Platanus racemosa	CALIFORNIA SYCAMORE	24" BOX (STD.)	DECIDUOUS	12	MOD
Quercus engelmanii	MESA OAK	24 BOX (STD.)	EVERGREEN	6	LOW

SHRUBS

	BOTANIC NAME	COMMON NAME	SIZE	QTY.	WUCOLS
MC	*Baccharis 'Centennial'*	CENTENNIAL BACCHARIS	5 GA.,	13	LOW
CP	*Caesalpinia pulcherrima*	RED BIRD OF PARADISE	5 GA.,	14	LOW
	Distictis buccinatoria	BLOOD-RED TRUMPET VINE	5 GA.,	4	LOW
LC	*Leucophyllum frutescens 'Compacta'*	COMPACT TEXAS SAGE	5 GA.,	115	LOW
SC	*Salvia clevelandii*	CLEVELAND SAGE	5 GA.,	26	LOW
SG	*Salvia greggii*	AUTUMN SAGE	5 GA.,	60	LOW
ST	*Senecio talinoides ssp. mandraliscae*	BLUE FINGER	1 GAL	62	LOW

GROUND COVER

BOTANIC NAME	COMMON NAME	SIZE	QTY.	WUCOLS
Baccharis pilularis 'Pigeon Point'	PIGEON POINT COYOTE BRUSH	1 GAL	108	LOW
Salvia 'Mrs. Beard'	MRS. BEARD SAGE	1 GAL	67	LOW

BASIN PLANTING

BOTANIC NAME	COMMON NAME	SIZE	QTY.	WUCOLS
Juncus patens	CALIFORNIA GRAY RUSH	1 GAL	366	LOW
Leymus condensatus 'Canyon Prince'	CANYON PRINCE WILD RYE	1 GAL	104	LOW
Romneya coulteri	MATILIJA POPPY	1 GAL	4	V. LOW

NOTES:
- ALL TREES WITH 'A 6' OF HARDSCAPE TO RECEIVE ROOTBARRIER
- ALL PLANTER AREAS TO RECEIVE A 3" MINIMUM DEPTH LAYER OF 'FOREST FLOOR MULCH' OR EQUAL, AVAILABLE FROM AGUANGA GREEN (714) 283-2572, UNLESS OTHERWISE NOTED
- PLANT WATER USE VALUES ARE PER WUCOLS IV PLANT LIST

Corydon Road Warehouse Project

Figure 5 - Conceptual Landscaping Plan

Map Date: 10/30/2025
Data Sources: Empire Design Group, 7/3/2025

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4.0 CLASS 32 INFILL EXEMPTION REQUIREMENTS

Article 19 of the California Environmental Quality Act (CEQA Guidelines Sections 15300 to 15333), includes a list of classes of projects that have been determined to not have a significant effect on the environment and as a result, are exempt from review under CEQA.

Class 32 Infill Exemption
One of the classes of projects exempt from CEQA review are projects that are specified as urban infill development. CEQA Guidelines Section 15332 defines the Class 32 Infill Exemption as a project that meets the following five requirements:

a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

c) The project site has no value as habitat for endangered, rare, or threatened species.

d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

e) The site can be adequately served by all required utilities and public services.

Exceptions
In addition to meeting the requirements listed above, the CEQA Guidelines Section 15300.2 provides specific instances where exceptions apply to a project that would otherwise meet the requirements for an exemption. These exceptions are:

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

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

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

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

e) Hazardous Waste Sites: A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code.

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

5.0 PROPOSED PROJECT CEQA EXEMPTION COMPLIANCE ANALYSIS

The analysis below provides substantial evidence that the Project properly qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment. Additionally, the analysis shows there are no exceptions to qualifying for the categorical exemption, as identified in CEQA Guidelines Section 15300.2.

a. Criterion Section 15332(a): General Plan and Zoning Consistency: ***The Project is consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations.***

The Project site has a City of Lake Elsinore General Plan land use designation of East Lake Specific Plan and an East Lake Specific Plan designation of Action Sports, Tourism, Commercial and Recreation and an Airport Overlay designation, which allows for a variety of uses, including manufacturing and warehousing with buildings up to 45-feet in height.

Table 3 shows the Project's consistency with the Action Sports, Tourism, Commercial and Recreation and the Airport Overlay development standards. As shown, the proposed Project would meet all of the proposed development standards, including lot frontage, setbacks, building height, and landscape buffer requirements. Therefore, the Project would be consistent with the applicable zoning regulations.

Table 3: Consistency with Applicable East Lake Specific Plan Development Standards

Development Feature	General Plan or Zoning Requirement	Proposed Project Consistency
Action Sports, Tourism, Commercial and Recreation Designation		
Minimum Lot Width / Street Frontage (ft)	100	**Consistent.** The proposed Project would have a street frontage of 250 feet. The site has a lot width of 250 feet.
Maximum Building Height (ft)	45 feet	**Consistent.** The proposed buildings would be 34 feet 4 inches high.
Front Setback	15 feet	**Consistent.** The proposed Project has a front setback of 20 feet of landscaping from the sidewalk to the parking lot. The proposed buildings would be setback approximately 82 feet from the proposed sidewalk along Corydon.
Side Setback Adjacent to Right-of-Way	15 feet	**Consistent.** The proposed Project would be setback 20 feet from the Como Street right-of-way along the western boundary of the Project site.
Parking Front Setback	Average of 25-feet, no less than 20-feet	**Consistent.** The proposed Project has a minimum front setback of 20 feet of landscaping from the sidewalk to the parking lot.
Landscaping	Minimum of 15 percent of the lot and along the public right-of-way	**Consistent.** The Project would install approximately 25,225 square feet (20% of the site) of landscaping. The majority of the landscaping would be located along the Project site frontage of Corydon Road and along the western boundary of the site.

Development Feature	General Plan or Zoning Requirement	Proposed Project Consistency
Airport Overlay		
Minimum Building Setbacks		
• Adjacent to Urban Arterial	45 feet	**Consistent.** The proposed buildings would be setback approximately 82 feet from the proposed sidewalk along Corydon.
• Adjacent to Major or Collector Street	35 feet	
Building Height	45 feet maximum	**Consistent.** The proposed buildings would be 34 feet 4 inches high.

b. Criterion Section 15332(b): Project Location, Size, and Context: ***The proposed development occurs within City limits on a Project site of no more than five acres substantially surrounded by urban uses.***

The Project is within the City limits of the City of Lake Elsinore, on an approximately 3.04acre site. As shown in Figure 3 and detailed in Section 2.4, the site is surrounded by a roadway to the south and east, warehouse and light industrial uses to the north, and undeveloped parcels followed by light industrial warehousing buildings to the west. As the Project site is less than five acres and substantially surrounded by urban uses, it meets the criteria of CEQA Guidelines Section 15332(b).

c. Criterion Section 15332(c): Endangered, Rare, or Threatened Species: ***The Project site was determined to have no value as habitat for endangered, rare, or threatened species.***

A General Biological Assessment and Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) Consistency Analysis was prepared for the Project site, which is included as Appendix A. The 3.04-acre Project site is undeveloped, and the site consists of disturbed/developed habitat. The General Biological Assessment describes that approximately half of the site is sparsely covered in non-native disturbed habitat, and the other half is developed with sparse non-native ornamental species. The General Biological Assessment did not identify any sensitive plant or wildlife species on the site or with the potential to be present on the site and determined that impacts to sensitive species would not occur from implementation of the Project.

The General Biological Assessment also determined that the Project site does not contain any streams or drainages or riparian habitat. There are no California Department of Fish and Wildlife (CDFW), United States Army Corps of Engineers (USACE), or Regional Water Quality Control Board (RWQCB) jurisdictional waters within the Project site boundaries; and that the site does not contain any wetlands or vernal pools. Thus, no aquatic, riparian, or wetland related resources would be impacted by the proposed Project.

The General Biological Assessment (Appendix A) details that the Project site is not located within a designated wildlife corridor or linkage. The Project site was evaluated for its function as a wildlife corridor that species use to move between wildlife habitat zones. The site consists of flat, disturbed and developed land that is fenced and surrounded by industrial development, Corydon Street, and residential development. No wildlife movement corridors were found to be present on the Project site, and none would be impacted by implementation of the proposed Project.

In addition, as a standard condition of approval, the Applicant is required to comply with Sections 3503, 3503.5, and 3513 of the California Fish and Game Code and the Migratory Bird Treaty Act (MBTA). Compliance with the California Fish and Game Code and MBTA would ensure that impacts to nesting birds and raptors, which

may use vegetation, including existing scattered non-native trees, on or near the Project site for nesting, during construction would not occur.

The MSHCP Consistency Analysis (Appendix A) determined that the Project site is located within the Elsinore Area Plan but outside of a MSHCP Criteria Cell. The Project site is not located within a Cell Group, or within plan-defined areas requiring surveys for criteria species, invertebrate species, amphibian species or mammalian species.

However, the Project site is within plan-defined areas requiring surveys for burrowing owl (*Athene cunicularia*), and narrow endemic plant species (NEPSSA). Therefore, a survey for burrowing owl was conducted pursuant to the *Burrowing Owl Survey Instructions for the Western Riverside County Multiple Species Habitat Conservation Plan Area,* which determined that the Project site does not provide suitable burrows/nesting opportunities for burrowing owl. No suitable burrowing owl habitat or burrow surrogates such as cement culverts, or debris piles were found on the site. No signs of ground squirrels were identified on the Project site. The Project site is disturbed by weed abatement and grading. Due to disturbance and lack of ground squirrel activity on the site, the habitat assessment resulted in the finding that there is no suitable habitat for burrowing owl present on the Project site. Thus, impacts related to burrowing owl would not occur.

The MSHCP Consistency Analysis (Appendix A) describes that the Project site is within a NEPSSA-designated area for six plant species: Munz's onion, San Diego ambrosia, many-stemmed dudleya, California Orcutt grass, spreading navarretia, Hammitt's clay-cress, Wright's trichocoronis. However, the Project site contains disturbed habitat and developed areas, and no habitat suitable for supporting these species occurs on site. Thus, impacts related to NEPSSA would not occur.

The Project site does not contain any habitat that would be considered riparian/riverine areas as defined in Section 6.1.2 of the Western Riverside MSHCP, and no vernal pools were observed within the Project boundaries. Thus, no impacts related to MSHCP compliance would occur from implementation of the Project.

The Project site is not located on or adjacent to a Western Riverside County MSHCP Conservation Area. Therefore, the Urban/Wildlands Interface Guidelines (Section 6.14 of the MSHCP) are not applicable to the Project.

Overall, the proposed Project site has no value as habitat for endangered, rare, or threatened species and meets the criteria of CEQA Guidelines Section 15332(c).

d. Criterion Section 15332(d): Significant Effects: *Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

TRAFFIC

Circulation System Program, Plan, Ordinance or Policy

Roadway

Construction. Construction activities associated with the Project would generate vehicular trips from construction workers traveling to and from the Project site and delivery and hauling of construction supplies to, and debris and recyclable solid waste from, the Project site. The CalEEMod modeling completed for the Project shows that construction would generate up to 30 workers generating vehicular trips and up to 8 vendors generating trips per day. This is a total of 76 round-trips per day. Should all of the workers arrive and leave the site during the AM and PM peak hours, it would result in 30 trips per peak hour trips during maximum

construction activity, which is a limited number of trips on the arterial roadway. Typically, congestion management programs require evaluation of developments that are expected to generate 50 or more peak-hour trips, and Projects generating fewer than 50 peak-hour trips are generally exempt from further analysis. As Project construction would result in less than 50 peak hour trips, it would not conflict with a circulation system program, plan, ordinance or policy. In addition, the construction related trips would generally travel from I-15 and the Bundy Canyon Road interchange, which connects to Mission Trail and then Corydon Road. Direct access from the freeway and arterial streets to the site would provide for efficient construction trips on existing roadway facilities. Impacts would be less than significant.

Operation. Operation of two warehouses would result in a limited number of vehicle trips (with a maximum of 9 trips in the PM peak hour) that would have access to and from the freeway using arterial streets providing for efficient operational trips on existing roadway facilities. Access to the proposed Project would be provided via a 30-foot-wide driveway along Corydon Road that would lead to 24-foot-wide minimum drive isles that would provide access to the roll-up doors and parking. The central drive aisle would serve as a fire lane. Thus, the Project would not result in an impact related to roadway circulation programs, plan, ordinance, or policy.

Transit

The Riverside Transit Agency provides public transportation to the general public throughout the City. The bus route closest to the Project site is Route 8 that provides a loop around the Cities of Lake Elsinore and Wildomar. Buses are equipped with wheelchair lifts, tie-downs and folding seats to accommodate most wheelchair configurations and are equipped with bicycle racks. The closest bus stops are located at the corner or Corydon Road and Grand Avenue, approximately 0.8-mile southwest from the Project site, and at Corydon Road and Mission Trail, approximately 0.7-mile northeast of the Project site.

The existing bus services would provide efficient transportation to and from the site for employees and has the potential to reduce vehicle miles traveled. Implementation of the two new warehouse buildings on the site would not alter or conflict with existing transit stops and schedules, and impacts related to transit services would not occur.

Bicycle

There is no existing bicycle lane located along Corydon Road and the Project does not involve changes to the existing bicycle lanes. The Project includes installation of bicycle racks to encourage bicycle transportation. The Project includes both long-term (at a minimum of 5 percent of employee parking) and short-term bicycle parking (at a minimum of 5 percent of the total parking), that would be located at the front of each building toward Corydon Road. As a result, the Project would support bicycling circulation and would not result in conflict related to bicycle circulation or policies related to bicycle facilities.

Pedestrian Facilities

The Project includes installation of a new sidewalk along the site frontage and would provide pedestrian ADA compliant walkways from Corydon Road to access the Project site buildings. The proposed Project would provide for both on and off-site pedestrian circulation; and therefore, potential impacts related to pedestrian facilities or a conflict with any program, plan, ordinance, or policy related to provision of pedestrian facilities would not occur.

Vehicle Miles Traveled

Senate Bill (SB) 743 was signed by Governor Brown in 2013 and required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts, aiming to promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks and a diversity of land uses. In response, Section 15064.3, *Determining the Significance of Transportation Impacts*, was added to the CEQA Guidelines which states that vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts and provides lead agencies with the discretion to choose the most appropriate methodology and thresholds for evaluating VMT.

The City of Lake Elsinore's criteria to identify projects that would have a less-than significant impact on VMT and therefore could be screened out from further analysis includes the following:

1. Transit Priority Area (TPA) Screening: Projects which are located within a TPA are presumed to have a less than significant impact on VMT.
2. Low VMT Area Screening: This screening threshold applies to residential or office projects that are located within a low VMT-generating area, which are identified by WRCOG as traffic analysis zones (TAZ) where total daily VMT per service population performs at or below the jurisdictional average of total VMT per service population under base year conditions. Projects which are located within a low VMT-generating area are presumed to have a less than significant impact on VMT.
3. Project Type Screening: Local serving projects listed in the TIA Guidelines (including unrefrigerated warehouses that are less than 258,000 square feet) and projects that generate fewer than 110 net new daily vehicle trips are presumed to have a less than significant impact on VMT. Also, projects that generate less than 3,000 MTCO2e per year are considered to have a less than significant impact related to VMT.

A VMT Screening Analysis was prepared (included in Appendix B) pursuant to the *City of Lake Elsinore Traffic Impact Analysis Guidelines for Vehicle Miles Traveled and Level of Service Assessment* (2022). The applicability of each of the City's VMT screening criterion to the proposed Project is described below.

Screening Criteria 1 – TPA Screening: According to the City's guidelines, projects located in a TPA may be presumed to have a less than significant impact if the floor area ratio (FAR) is 0.75 or higher, includes no more parking for residents, customers, or employees than the City code mandates, and is consistent with the Sustainable Communities Strategy (SCS). The proposed Project is not located in a TPA. The proposed Project site is not located within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor. Therefore, the Project would not meet the TPA Screening Criteria.

Screening Criteria 2 - Low VMT Area Screening: The City Guidelines states that "Residential and office projects located within a low VMT- generating area are presumed to have a less than significant impact absent substantial evidence to the 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." City Guidelines identifies low VMT generating traffic analysis zones as those that generate VMT per service population below the City of Lake Elsinore's baseline's VMT per service population.

The Western Riverside Council of Governments (WRCOG) Transportation VMT Tool was used to determine if the site is located within a low VMT generating area. The WRCOG VMT Tool found that the Project is not located in a low VMT-generating area. Therefore, the proposed Project would not meet Screening Criteria 2.

Screening Criteria 3 – Project Type Screening: The City's guidelines state that specific projects have a less than significant impact absent substantial evidence to the contrary. This includes local serving retail projects less than 50,000 square feet, local serving projects, unrefrigerated warehouses that are less than 258,000 square feet, and projects generating fewer than 110 daily vehicle trips.

The proposed Project consists of two unrefrigerated warehouses that would each be 24,296 square feet. Thus, the Project would result in 48,592 square feet of unrefrigerated warehouse area, which would be less than 258,000 square feet. Thus, the Project would meet the Project type screening and would be less than significant.

In addition, using trip rates from the Institute of Transportation Engineers (ITE) *Trip Generation*, 11th Edition (2021), Table T-1 identifies that operation of the proposed Project would generate 83 daily trips including 8 trips during the AM peak hour and 9 trips during the PM peak hour. This is less than 110 daily trips; therefore, the Project would also meet the number of trips for Screening Criteria 3, and impacts related to VMT would be less than significant.

Table T-1: Project Trip Generation

ITE Code	Description	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Project Trip Rates								
150	Warehouse (per 1,000 sf)	1.71	77%	23%	0.17	28%	72%	0.18
Proposed Project								
150	**Warehouses 48,592 sf**	**83**	**6**	**2**	**8**	**3**	**6**	**9**

Source: *VMT Screening Analysis*, Appendix B.

Hazards Due to a Design Feature or Incompatible Uses

The Project includes development of two warehouses with landscaping, circulation, and parking. The Project includes only light industrial warehousing uses and does not include any incompatible uses, such as farm equipment.

The proposed Project site would be accessed from Corydon Road through a 30-foot-wide driveway and by a 24-foot-wide minimum drive isle, which is consistent with City circulation safety design standards. The Project would provide pedestrian circulation through walkways on the site and the Project would install offsite sidewalks along the Project frontage of Corydon Road. The Project would not increase any hazards related to a design feature. The City's construction permitting process includes review of Project plans to ensure that no potentially hazardous transportation design features would be introduced by the Project. As a result, impacts related to hazardous vehicular circulation design features would not occur.

Emergency Access

Construction. The proposed construction activities, including equipment and supply staging and storage, would occur within the Project site, and therefore would not require roadway lane closures that could restrict

access of emergency vehicles to the Project site or adjacent areas. The installation of new the driveway and sidewalk, and connections to existing infrastructure systems that would be implemented during construction of the proposed Project would not require closure of Corydon Road. Any temporary lane closures needed for utility connections or driveway access construction would be implemented consistent with the recommendations of the California Joint Utility Traffic Control Manual (Caltrans 2014), as required by construction permits. Thus, implementation of the Project through the City's permitting process would ensure existing regulations are adhered to and that potential construction related emergency access impacts would not occur.

Operation. Operation of the Project would also not result in inadequate emergency access. The Project driveway and internal access would be required through the City's permitting procedures to meet the City's design standards and provides adequate turning space for passenger cars, fire trucks, and delivery trucks. The Project provides a 30-foot-wide driveway and minimum of a 24-foot wide drive isle. Also, the Project would meet all fire and emergency access requirements. The City would review the development plans as part of the permitting procedures to ensure adequate emergency access pursuant to the requirements in Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9). As a result, impacts related to inadequate emergency access would not occur.

The proposed Project would not result in any significant effects relating to traffic; therefore, the proposed Project meets the traffic related criteria of CEQA Guidelines Section 15332(d).

NOISE

An Acoustical Analysis Report (Appendix C) was prepared for the proposed Project to assess the Project's potential noise and vibration related impacts. The following analysis incorporates information from the study.

Noise Terminology

Various noise descriptors are utilized in this noise analysis, and are summarized as follows:

- **Leq:** The equivalent sound level, which is used to describe noise over a specified period of time, typically 1-hour, in terms of a single numerical value. The Leq of a time-varying signal and that of a steady signal are the same if they deliver the same acoustic energy over a given time. The Leq may also be referred to as the average sound level.
- **Lmax:** The instantaneous maximum noise level experienced during a given period of time.
- **Lmin:** The instantaneous minimum noise level experienced during a given period of time.
- **CNEL:** The Community Noise Equivalent Level, which, similar to the Ldn, is the average A-weighted noise level during a 24-hour day that is obtained after an addition of 5 dBA to measured noise levels between the hours of 7:00 pm to 10:00 pm and after an addition of 10 dBA to noise levels between the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.
- **Ambient Noise:** The "ambient noise level" is the background noise level associated with a given environment at a specified time and is usually a composite of sound from many sources from many directions.

Noise Regulations

General Plan

The City's General Plan Public Safety and Welfare Element includes a compatibility matrix (Table 3-1) to determine if new land uses are compatible with the existing noise environment. The table identifies noise environments that are less than 70 dBA CNEL to be normally compatible with residential uses, and areas that have existing ambient noise levels above 75 dBA CNEL are considered clearly incompatible with residential uses. Commercial and industrial uses are normally compatible with noise levels up to 85 dBA CNEL.

Lake Elsinore Municipal Code

Section 17.176.060, Exterior Noise Limits, identifies the maximum permissible sound levels by receiving land use. For light industrial uses, noise levels can be 70 dBA at any time. For residential land uses, the noise level limits for the daytime (7:00 a.m. to 10:00 p.m.) hours of 50 dBA L_{50} and 40 dBA L_{50} during the nighttime (10:00 p.m. to 7:00 a.m.) hours for:

- a cumulative period of 30 minutes in any hour (L_{50}); or
- the standard plus 5 dBA for a cumulative period of more than 15 minutes in any hour (L_{25}); or
- the standard plus 10 dBA for a cumulative period of more than 5 minutes in any hour (L_8); or
- the standard plus 15 dBA for a cumulative period of more than 1 minute in any hour (L_2); or
- the standard plus 20 dBA for any period of time (Lmax).

LEMC Section 17.176.060 for residential and light industrial uses are detailed in Table N-1.

Table N-1: LEMC Residential Exterior Noise Level Standards

Receiving Land Use	Condition	Based Exterior Noise Level Standards (dBA)				
		L_{50} (30 mins)	L_{25} (15 mins)	L_8 (5 mins)	L_2 (1 min)	L_{max} (Anytime)
Single-Family Residential	Daytime	50	55	60	65	70
	Nighttime	40	45	50	55	60
General Commercial	Daytime	65	70	75	80	85
	Nighttime	60	65	70	75	80
Light Industrial	Anytime	70	75	80	85	90

Additionally, the LEMC states that, on the boundary between two different zones, the noise level limit applicable to the lower noise zone plus six decibels shall apply. Thus, operational noise limits were applied as 56 dBA at single-family residential properties and 65 dBA at commercial properties.

Section 17.176.080.F, Construction/Demolition, states that the following is prohibited:

1. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration, or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on weekends or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work of public service utilities or by variance issued by the City.

2. Noise Restrictions at Affected Properties. Where technically and economically feasible, construction activities shall be conducted in such a manner that the maximum noise levels at affected residential properties will not exceed those listed in the following schedule:

   Mobile Equipment: Maximum noise levels for nonscheduled, intermittent, short-term operation (less than 10 days) of mobile equipment:

	Type I Areas Single-Family Residential	Type II Areas Multifamily Residential	Type III Areas Semi-Residential/ Commercial
Daily, except Sundays and Legal Holidays 7:00 a.m. to 7:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 7:00 p.m. to 7:00 a.m. and all day Sunday and Legal Holidays	60 dBA	65 dBA	70 dBA

   Stationary Equipment: Maximum noise levels for repetitively scheduled and relatively long-term operation (period of 10 days or more) of stationary equipment:

	Type I Areas Single-Family Residential	Type II Areas Multifamily Residential	Type III Areas Semi-Residential/ Commercial
Daily, except Sundays and Legal Holidays 7:00 a.m. to 7:00 p.m.	60 dBA	65 dBA	70 dBA
Daily,7:00 p.m. to 7:00 a.m. and all day Sunday and Legal Holidays	50 dBA	55 dBA	60 dBA

Section 17.176.080.G, Vibration, states that it is prohibited to operate any device that creates a vibration which 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 (46 meters) from the source if on public space or public right-of-way. However, the LEMC does not define a quantitative vibration threshold. The California Department of Transportation (Caltrans) has published thresholds that are used for construction analyses. As shown in Table N-2, the threshold at which there is a risk to older residential structures is a peak particle velocity (PPV) of 0.3 (Caltrans, 2020).

Table N-2: Caltrans Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.08
Fragile buildings	0.10
Historic and some old buildings	0.25
Older residential structures	0.30

Source: *Transportation and Construction Vibration Guidance Manual (Caltrans 2020).*

Sensitive Receivers

Noise sensitive receivers are defined as locations where people reside or where the presence of unwanted sound could otherwise adversely affect the use of the land, including: residences, schools, hospitals, churches, libraries, and recreation areas. The closest noise sensitive receptors to the Project site are the existing residences that are across Corydon Road to the east of the site, as close as approximately 109 feet.

Construction Noise Impacts

The construction noise from the proposed Project would occur throughout various portions of the Project site over a 13-month period. Noise generated by construction equipment would include a combination of trucks, power tools, concrete mixers, and portable generators that when combined can reach high levels. Construction is expected to occur in the following stages: site preparation, grading, building construction, paving, and architectural coating. Construction noise would not be stationary, as construction equipment would move throughout the site during various stages of each activity. Thus, mobile construction noise sources were evaluated as point sources moving within an area to approximate noise impacts to off-site receivers as equipment moves around the Project site. Mobile equipment noise calculations also consider typical duty cycles of equipment to account for periods of activity and inactivity on the site. The closest point on the Project site to a residential receptor is approximately 109 feet. In addition, the half-width roadway improvements would be as close as approximately 50 feet from the closest residence, which is across Corydon Road from the Project site. Calculated construction noise levels for both mobile and stationary equipment at the site property lines adjacent to the closest land uses are listed in Table N-3.

Table N-3: Project Construction Noise Levels at Nearest Noise Receptors

Stage	Receiver Location	Average Noise Level (dBA)
Site Preparation	R1 (North Property Line 1)	79.5 (All Mobile Sources)
	R2 (North Property Line 2)	81.2 (All Mobile Sources)
	R5 (East Residential Property Line)	64.8 (All Mobile Sources)
	R6 (East Residential Property Line)	71.9 (All Mobile Sources)
Grading	R1 (North Property Line 1)	79.0 (All Mobile Sources)
	R2 (North Property Line 2)	80.7 (All Mobile Sources)
	R5 (East Residential Property Line)	64.3 (All Mobile Sources)
	R6 (East Residential Property Line)	71.4 (All Mobile Sources)
Building Construction	R1 (North Property Line 1)	74.2 (All Sources) / 55.6 (Stationary Only)
	R2 (North Property Line 2)	75.9 (All Sources) / 56.4 (Stationary Only)
	R5 (East Residential Property Line)	59.8 (All Sources) / 47.8 (Stationary Only)
	R6 (East Residential Property Line)	66.8 (All Sources) / 52.7 (Stationary Only)
Paving	R1 (North Property Line 1)	76.1 (All Mobile Sources)
	R2 (North Property Line 2)	77.8 (All Mobile Sources)
	R5 (East Residential Property Line)	61.6 (All Mobile Sources)
	R6 (East Residential Property Line)	68.7 (All Mobile Sources)
Architectural Coating	R1 (North Property Line 1)	63.0 (Stationary Only)
	R2 (North Property Line 2)	63.8 (Stationary Only)
	R5 (East Residential Property Line)	55.3 (Stationary Only)
	R6 (East Residential Property Line)	60.0 (Stationary Only)

Source: *Acoustical Analysis*, Appendix C.

As shown in Table N-3, the modeled construction noise levels from mobile sources reach up to 71.9 dBA Leq and the noise levels from stationary equipment would reach up to 60.0 dBA Leq at the nearest residential property line to the east (R6). This is below the allowable construction noise level of 75 dBA in residential areas

per LEMC Section 17.167.080(f). In addition, the mobile construction noise levels at the closest commercial property lines would reach up to 81.2 dBA and the stationary construction equipment noise levels would reach up to 63.8 dBA at the closest commercial uses, which is below the 85 dBA threshold. Therefore, impacts related to construction noise would be less than significant.

Furthermore, construction noise would be temporary in nature as the operation of each piece of construction equipment would not be constant throughout the construction day, and equipment would be turned off when not in use. Further, per LEMC Section 17.176.080, construction activities are prohibited between the hours of 7:00 p.m. and 7:00 a.m. or at any time on weekend or on holidays. The construction activities would be in compliance with the City's construction-related noise standards.

Operation Noise Impacts

Onsite Operational Noise. Onsite operational noise would largely be generated by vehicles, trucks, and forklifts moving on the site and from heating and air conditioning units. The Acoustical Analysis also assumes one forklift will be operating behind each building, with five truck deliveries per hour (to account for activity at each of the four loading areas, and an average based on the anticipated 29 truck trips per day). As shown on Table N-4, the Project generated noise volumes would range from 40.5 dBA to 54.0 dBA, which is less than the LEMC standards of 56 dBA at single-family residential properties and 65 dBA at commercial properties. Therefore, onsite operational noise impacts would be less than significant.

Table N-4: Project Operational Noise Levels at Nearest Noise Receptors

Receiver	Description	Noise Threshold (dBA)	Noise Level (dBA)
R1	North Non-Residential Property Line 1	65	54.0
R2	North Non-Residential Property Line 2	65	53.1
R3	South Non-Residential Property Line 1	65	50.1
R4	South Non-Residential Property Line 2	65	52.3
R5	East Residential Property Line 1	56	40.5
R6	East Residential Property Line 2	56	47.1
R7	West Non-Residential Property Line	65	52.7

Source: *Acoustical Analysis*, Appendix C.

Traffic Noise. Vehicle and truck trips from operation of the Project would generate offsite noise. During operation, the proposed Project is expected to generate approximately 83 average daily trips with 8 trips during the a.m. peak hour and 9 trips during the p.m. peak hour. A significant direct impact occurs when project traffic combines with existing traffic and causes a doubling of sound energy, which is an increase of 3 dB.

The existing traffic volume of Corydon Road was shown to be 15,630 average daily trips (ADT) in the East Lake Specific Plan Amendment EIR. The additional 83 trips per day from the proposed Project (as detailed in Table T-1) would result in an increase of 0.5 percent per day, which would result in a less than significant and inaudible increase in vehicle noise. In addition, the increase in 8 trips during the a.m. peak hour and 9 trips during the p.m. peak hour would not result in a significant increase in traffic noise. Therefore, impacts related to operational traffic noise would be less than significant.

Vibration Impacts

Construction Vibration. Construction activities for development of the Project would include excavation and grading, which have the potential to generate low levels of groundborne vibration. People residing in close proximity to the construction could be exposed to the generation of excessive groundborne vibration or groundborne noise levels related to construction activities. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels.

As shown in Table N-5, a vibratory roller could generate up to 0.21 in/sec PPV at and operation of a large bulldozer could generate up to 0.089 PPV at a distance of 25 feet (two of the most vibratory pieces of construction equipment), and would not exceed the damage threshold for older residential structures of 0.30 in/sec PPV. Groundborne vibration at sensitive receptors associated with this equipment would drop off as the equipment moves away. For example, as the vibratory roller moves further than 100 feet from the sensitive receptors, the vibration associated with it would drop below 0.0026 in/sec PPV.

Table N-5: Construction Equipment Vibration Source Levels

Equipment	PPV at 25 ft, in/sec
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Source: *Transportation and Construction Vibration Guidance Manual (Caltrans 2020).*

The closest residence is approximately 109 feet from the Project site boundary, at which equipment vibrations would be approximately 0.0026 in/sec PPV from vibratory equipment used during construction, which is less than the threshold of 0.3 PPV. Hence, impacts related to construction vibration would be less than significant.

Overall, the proposed Project would not result in any significant effects relating to noise or vibration; therefore, the proposed Project meets the noise related criteria of CEQA Guidelines Section 15332(d).

AIR QUALITY

This section is based on the Air Quality and Greenhouse Gas Technical Study that was prepared for the proposed Project that is provided in Appendix D. The Project's construction and operational emissions were calculated using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.32 pursuant to the South Coast Air Quality Management District (SCAQMD) methodology criteria.

Air Quality Management Plan Consistency

The Project site is located in the South Coast Air Basin, which is under the jurisdictional boundaries of the SCAQMD. The SCAQMD and Southern California Association of Governments (SCAG) are responsible for preparing the Air Quality Management Plan (AQMP), which addresses federal and state Clean Air Act (CAA) requirements. The AQMP details goals, policies, and programs for air quality in the Basin and uses SCAQMD

and SCAG land use designations contained in General Plan documents to forecast, inventory, and allocate regional emissions from land use and development-related sources.

As described in Chapter 12, Section 12.2 and Section 12.3 of the SCAQMD's CEQA Air Quality Handbook (1993), for purposes of analyzing consistency with the AQMP, if a proposed project would have a development density and vehicle trip generation that is substantially greater than what was anticipated in the General Plan, then the proposed project would conflict with the AQMP. On the other hand, if a project's density is consistent with the General Plan, its emissions would be consistent with the assumptions in the AQMP, and the project would not conflict with SCAQMD's attainment plans. In addition, the SCAQMD considers projects consistent with the AQMP if the project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation.

The Project site has a General Plan land use designation of East Lake Specific Plan and an East Lake Specific Plan designation of Action Sports, Tourism, Commercial and Recreation and has an Airport Overlay designation, which allows development of warehouses. The Project includes a Minor Modification to the East Lake Specific Plan to reallocate approximately 50,000 square feet of the Industrial Development Target allocated from Specific Plan Area 2 to Specific Plan Area 3, where the proposed Project is located. With the Minor Modification of the Specific Plan, the proposed Project would be within the anticipated industrial development buildout anticipated by the East Lake Specific Plan. Therefore, the Project is consistent with the buildout density of the Specific Plan area and would not conflict with the AQMP.

Also, as described in the analysis below, emissions generated by construction and operation of the proposed Project would not exceed thresholds. Thus, the Project would not result in an increase in the frequency or severity of existing air quality violations or cause a new violation, and no impacts would occur.

Regional Construction Emissions

Construction activities associated with the proposed Project would generate pollutant emissions from the following construction activities: site preparation, grading, building construction, paving, and architectural coating. The volume of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring. Construction activities would generate emissions from onsite construction equipment, haul of soils export and import of construction materials, and construction worker vehicle trips to and from the Project site during the estimated eight months of construction.

It is mandatory for all construction projects to comply with several SCAQMD Rules, including Rule 403 for controlling fugitive dust, PM_{10}, and $PM_{2.5}$ emissions from construction activities. Rule 403 requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes, applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the proposed project site, covering all trucks hauling soil with a fabric cover and maintaining a freeboard height of 12-inches, and maintaining effective cover over exposed areas. Compliance with Rule 403 was accounted for in the construction emissions modeling and is ensured through the City's development permitting process. In addition, implementation of SCAQMD Rule 1113 that governs the volatile organic compounds (VOC) content in architectural coating, paint, thinners, and solvents, would be required and is also ensured through the City's development permitting process.

As shown in Table AQ-1, CalEEMod modeling details that construction emissions generated by the proposed Project would not exceed SCAQMD regional thresholds. Therefore, construction activities would result in a less than significant impact.

Table AQ-1: Regional Construction Emissions Summary

Construction Year	Maximum Daily Emissions (lbs/day)					
Maximum Day	**VOC**	**NOx**	**CO**	**SO_2**	**PM_{10}**	**$PM_{2.5}$**
2025	0.74	16.0	31.0	0.050	1.13	0.24
2026	10.6	19.1	30.9	0.050	4.30	2.02
2027	10.6	14.0	20.3	0.027	0.67	0.31
Maximum Daily Emissions	**10.6**	**19.1**	**31.0**	**0.050**	**4.30**	**2.02**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Air Quality and Greenhouse Gas Study,* Appendix D

Regional Operational Emissions

Implementation of the Project would result in long-term regional emissions of criteria air pollutants and ozone precursors associated with area sources, such as natural gas and electricity consumption, landscaping, applications of architectural coatings, and consumer products. However, vehicular emissions would generate a majority of the emissions generated from the Project.

Operational emissions associated with the proposed Project were modeled using CalEEMod and are presented in Table AQ-2. As shown, the proposed Project would result in long-term regional emissions of the criteria pollutants that would be below the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the national ambient air quality standards (NAAQS) or the California Ambient Air Quality Standards (CAAQS) and would not result in a cumulatively considerable net increase of any criteria pollutant. Impacts would be less than significant.

Table AQ-2: Summary of Regional Operational Emissions

	Maximum Daily Emissions (lbs/day)					
Operational Source	**VOC**	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Mobile	0.37	0.48	4.38	0.01	1.08	0.28
Area	1.10	0	0	0	0	0
Energy	0.01	0.25	0.21	<0.005	0.02	0.02
Off-Road	0.28	2.50	16.4	0.03	0.05	0.05
Total Maximum Daily Emissions	**1.76**	**3.23**	**21.0**	**0.04**	**1.15**	**0.35**
SCAQMD Significance Thresholds	55	55	550	150	150	55
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Air Quality and Greenhouse Gas Study*, Appendix D

Localized Significant Thresholds (LST)

The SCAQMD recommends the evaluation of localized NO_x, CO, PM_{10}, and $PM_{2.5}$ construction-related impacts to sensitive receptors in the immediate vicinity of the Project site. Such an evaluation is referred to as a localized significance threshold (LST) analysis. The impacts were analyzed pursuant to the SCAQMD's Final Localized Significance Threshold Methodology. According to the LST Methodology, off-site mobile emissions from the Project should not be included in the emissions compared to the LSTs. SCAQMD has developed LSTs that

represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and thus would not cause or contribute to localized air quality impacts. LSTs are developed based on the ambient concentrations of NO_x, CO, PM_{10}, and $PM_{2.5}$ pollutants for each of the 38 source receptor areas (SRAs) in the SCAB. The Project site is located in SRA 25, Lake Elsinore. Sensitive receptors include uses such as residences, schools, playgrounds, childcare centers, and athletic facilities. The nearest LST sensitive receptors to the Project site are the residences approximately 30 feet (9.1 meters) east of the site.

Construction LST. The localized thresholds from the mass rate look-up tables in SCAQMD's Final Localized Significance Threshold Methodology document, were developed for use on projects that are less than or equal to 5-acres in size or have a disturbance of less than or equal to 5 acres daily and were used to evaluate LSTs. The maximum number of acres disturbed on the peak day of construction was calculated from the CalEEMod model construction equipment list, which identifies that crawler tractors, graders, and rubber-tired dozers would disturb 2.0-acres in an 8-hour day. As shown in Table AQ-3, with implementation of SCAQMD Rules 403 and 1113, the maximum daily construction emissions from the proposed Project would not exceed the applicable SCAQMD LST thresholds. Therefore, construction LST impacts would be less than significant.

Table AQ-3: Localized Maximum Construction Emissions

	Maximum Daily Emissions (lbs/day)			
Emissions	**NO_x**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	18.8	30.1	3.78	1.87
SCAQMD Significance Thresholds	234	1,100	7	4
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: *Air Quality and Greenhouse Gas Study,* Appendix D

Operational LST. According to the SCAQMD LST methodology, LSTs apply to a project's stationary and on-site mobile sources. Projects that involve mobile sources that spend long periods queuing and idling at a site, such as transfer facilities, have the potential to exceed the operational LSTs. The proposed Project consists of two warehouses that would generate 8 AM peak hour trips and 9 PM peak hour trips as shown on Table T-1 and is not anticipated to result in significant vehicle idling or queuing activity. However, because the proposed warehouses involve truck traffic and idling emissions, operational LST emissions were calculated. As detailed in Table AQ-4, the maximum daily operational emissions from the proposed Project would not exceed the applicable SCAQMD LST thresholds. Therefore, operational LST impacts would be less than significant.

Table AQ-4: Localized Maximum Operational Emissions

	Maximum Emissions (lbs/day)			
Emissions	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Emissions	3.23	23.1	1.15	0.35
SCAQMD Significance Thresholds	*234*	*1,100*	*2*	*1*
Threshold Exceeded?	**No**	**No**	**No**	**No**

Source: *Air Quality and Greenhouse Gas Study,* Appendix D

Odors

The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

> *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, or 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. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals*.

The type of facilities that are considered to result in other emissions, such as objectionable odors, include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed Project would implement warehouse development that does not involve the types of uses that would emit objectionable odors affecting a substantial number of people. In addition, odors generated by the Project are required to be in compliance with SCAQMD Rule 402, which would prevent nuisance odors.

During construction, emissions from construction equipment, architectural coatings, and paving activities may generate odors. However, these odors would be temporary, intermittent in nature, and would not affect a substantial number of people. Any potential noxious odors would be confined to the immediate vicinity of the construction equipment. Also, the short-term construction-related odors would cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with other emissions, such as odors, would not adversely affect a substantial number of people.

Greenhouse Gas Emissions

The City of Lake Elsinore has not adopted a numerical significance threshold to evaluate greenhouse gas (GHG) impacts. SCAQMD does not have approved thresholds; however, it does have draft thresholds that provides a tiered approach to evaluate GHG impacts, which includes the following:

- Tier 1 consists of evaluating whether or not the project qualifies for any applicable exemption under CEQA.
- Tier 2 consists of determining whether the project is consistent with a GHG reduction plan. If a project is consistent with a qualifying local GHG reduction plan, it does not have significant GHG emissions.
- Tier 3 consists of screening values, which the lead agency can choose, but must be consistent with all projects within its jurisdiction. A project's construction emissions are averaged over 30 years and are added to the project's operational emissions. If a project's emissions are below one of the following screening thresholds, then the project is less than significant:
    - Residential and Commercial land use: 3,000 metric tons of carbon dioxide equivalent (MTCO2e) per year
    - Industrial land use: 10,000 MTCO2e per year
    - Based on land use type: residential: 3,500 MTCO2e per year; commercial: 1,400 MTCO2e per year; or mixed use: 3,000 MTCO2e per year

The SCAQMD's draft threshold uses the Executive Order S-3-05 year 2050 goal as the basis for the Tier 3 screening level. Achieving the Executive Order's objective would contribute to worldwide efforts to cap CO_2

concentrations at 450 parts per million (ppm), thus stabilizing global climate. Therefore, for purposes of examining potential GHG impacts from implementation of the proposed Project, and to provide a conservative analysis of potential impacts, the Tier 3 screening level for all land use projects of 3,000 MTCO2e was selected as the significance threshold. In addition, SCAQMD methodology for evaluating a project's construction emissions are to amortize them over 30-years and then add them to the project's operational emissions to determine if the project would exceed the screening values listed above.

Project GHG Emissions. Construction activities generate sources of GHG emissions from construction equipment and workers' commutes to and from the site. The combustion of fossil-based fuels creates GHGs such as CO_2, CH_4, and N_2O. As shown on Table AQ-5, construction of the Project is estimated to generate 21.5 MTCO2e per year from construction emissions amortized over 30 years per SCAQMD methodology.

Table AQ-5: Project Construction GHG Emissions

Year	Annual Emissions (Metric Tons CO_2e)
2025	54.9
2026	587
2027	2.07
Total Construction Emissions	**644**
Amortized Over 30 years	**21.5**

Source: *Air Quality and Greenhouse Gas Study,* Appendix D

During operations, the proposed Project would generate long-term GHG emissions from vehicular/truck trips, mechanical operations related to truck maintenance; water, natural gas, and electricity consumption; and solid waste generation. Water use results in indirect GHG emissions from the energy required to transport water from its source. Natural gas use results in the emission of two GHGs: CH_4 (the major component of natural gas) and CO_2 (from the combustion of natural gas). Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. As shown in Table AQ-6, the Project would generate approximately 703 MTCO2e per year, which is less than the SCAQMD threshold of 3,000 MTCO2e. Therefore, impacts would be less than significant.

Table AQ-6: Project Total GHG Emissions

Emission Source	Annual Emissions (Metric Tons CO_2e)
Mobile Source	195
Area	< 1
Energy	115
Water Use	34.3
Solid Waste	14.3
Off-Road	323
Total Operational	**681**
Construction (amortized)	21.5
Total	**703**
SCAQMD Threshold	**3,000**
Exceeds Threshold?	**No**

Source: *Air Quality and Greenhouse Gas Study,* Appendix D

Project Compliance with Applicable GHG Policies. The proposed development Project would comply with state programs that are designed to be energy efficient. The proposed Project would comply with all mandatory

measures under the California Title 24, California Energy Code, and the CalGreen Code, which would provide efficient energy and water consumption. The City's administration of the requirements includes review of the energy conservation measures during the permitting process, which ensures that all requirements are met.

The City of Lake Elsinore adopted a Climate Action Plan (CAP) in 2011. Table AQ-7 provides an analysis of the proposed Project's consistency with the policies in the City's CAP.

Table AQ-7: Project Consistency with the City's 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 the project site. The Project site is located within a light industrial and rural residential area that does not include neighborhood activity centers, major destinations, and transit facilities contiguous with the site. However, the Project includes installation of a new sidewalk along the site frontage and would provide pedestrian ADA compliant walkways from Corydon Road to access the Project site buildings. As such, the proposed Project would be consistent 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 General Plan EIR Figure 3.4-11 identifies a planned bicycle lane along Corydon Road. The Project does not involve installation of a bicycle lane, but does include both long-term (at a minimum of 5 percent of employee parking) and short-term bicycle parking (at a minimum of 5 percent of the total parking), that would be located at the front of each building toward Corydon Road. As such, the proposed Project would be consistent 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 non-residential developments. The Project includes installation of bicycle racks to encourage bicycle transportation. The Project includes both long-term (at a minimum of 5 percent of employee parking) and short-term bicycle parking (at a minimum of 5 percent of the total parking), that would be located at the front of each building toward Corydon Road. As such, the proposed Project would be consistent with this measure.
Measure T-2.1: Designated Parking for Fuel Efficient Vehicles	**Consistent.** This measure requires new non-residential developments to designate parking spaces for low-emitting, fuel-efficient vehicles. The Project includes 4 EV parking spaces. As such, the proposed Project would be consistent with this measure.
Measure T-4.1: Commute Trip Reduction Program	**Consistent.** This measure requires the City to institute a commute trip reduction program for employers with fewer than 100 employees. This measure would be

CAP Measure	Consistency
	implemented with the Project's occupancy permits. As such, the proposed Project would not conflict with this measure.
Measure E-1.1: Tree Planting Requirements	**Consistent.** This measure requires new developments to plant trees along property lines and in parking areas. The Project would comply with this measure as shown on Figure 5, *Conceptual Landscaping Plan*. This measure is implemented by the City through the development review process, and conditions of approval. As such, the proposed Project would not conflict with this measure.
Measure E-1.2: Cool Roof Requirements	**Consistent.** This measure requires new non-residential development to use roofing materials having solar reflectance, thermal emittance, or Solar Reflectance Index consistent with CALGreen Tier 1 values. This measure would be implemented by the proposed Project and verified during the development permitting process.
Measure E-1.3: Energy Efficient Building Standards	**Consistent.** This measure requires that new construction exceed the California Energy Code requirements through either the performance-based or prescriptive approach described in the California Green Building Code. This measure is implemented by the Departments of Planning, Public Works, and Building through the development review process, and conditions of approval. As such, 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 Southern California Edison to replace existing high-pressure sodium streetlights and traffic lights with high efficiency alternatives, such as Low Emitting Diode (LED) lights; replace existing City owned traffic lights with LED lights; require any new street and traffic lights to be LED. This measure is currently being implemented by the Department of Public Works through renovation. This measure would apply to any street and/or traffic lights replaced or installed as part of the Project. This measure is implemented by the Departments of Planning, Public Works, and Building through the development review process, 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 the City's AB 1881 Landscaping Ordinance, which requires that landscaping be water efficient, thereby consuming less energy and reducing emissions. The proposed Project is consistent with the City's landscaping and irrigation requirements. This measure is verified by the Departments of Planning, Public Works, and Building through the development review process, and conditions of approval. 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. The proposed Project is designed to be consistent with the Title 24 water conservation requirements. This measure would be verified by the Departments of Building and Planning through project permitting. As such, the proposed Project would not conflict with this measure.
Measure E-5.1: Renewable Energy Incentives	**Consistent.** 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 website. This measure is implemented by the Departments of Building and Planning

CAP Measure	Consistency
	through outreach and incentive programs. The proposed Project is designed to be consistent with the Title 24 energy requirements. The proposed Project would not conflict with this measure.
Measure S-1.4: Construction and Demolition Waste Diversion	**Consistent.** 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 the project. This measure is implemented by the Departments of Planning and Building through City contracts, LEMC amendments, development and review process, and conditions of approval. The proposed Project would implement construction and demolition waste diversion, as required by Section 5.408.1 of the California Green Building Standards Code. As such, the proposed Project would not conflict with this measure.

Overall, the proposed Project would not result in any significant effects relating to air quality emissions; therefore, the proposed Project meets the air quality related criteria of CEQA Guidelines Section 15332(d).

WATER QUALITY

The Project site is located within the Santa Ana River Watershed, which includes the approximately 100-mile-long Santa Ana River and more than 50 tributaries, making it the largest river basin in Southern California. The City of Lake Elsinore is underlain by the Elsinore Groundwater Basin, which covers 40.2 square miles in western Riverside County. The City is within the jurisdiction of the Santa Ana Regional Water Quality Control Board (RWQCB), which sets water quality standards for all ground and surface waters within its region. Water quality standards are defined under the Clean Water Act (CWA) to include both the beneficial uses of specific water bodies and the levels of water quality that must be met and maintained to protect those uses (water quality objectives). Water quality standards for all ground and surface waters overseen by the RWQCB are documented in its Basin Plan, and the regulatory program of the RWQCB is designed to minimize and control discharges to surface and groundwater, largely through permitting, such that water quality standards are effectively attained.

Construction. Construction of the proposed Project would require grading and excavation of soils, which would loosen sediment, and then have the potential to mix with surface water runoff and degrade water quality. Additionally, construction would use heavy equipment and construction-related chemicals, such as concrete, cement, asphalt, fuels, oils, antifreeze, transmission fluid, grease, solvents, and paints. These potentially harmful materials could be accidentally spilled or improperly disposed of during construction and, if mixed with surface water runoff could wash into and pollute waters.

These types of water quality impacts during construction of the Project would be prevented through implementation of a stormwater pollution prevention plant (SWPPP). Construction of the Project would disturb more than one acre of soil; therefore, the proposed Project would be required to obtain coverage under the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity (and LEMC Section 14.08). Construction activity subject to this permit includes clearing, grading, and ground disturbances such as trenching, stockpiling, or excavation. The Construction General Permit requires implementation of a SWPPP that is required to identify all potential sources of pollution that are reasonably expected to affect the quality of storm water discharges from the construction site. The SWPPP would generally contain a site map

showing the construction perimeter, proposed buildings, stormwater collection and discharge points, general pre- and post-construction topography, drainage patterns across the site, and adjacent roadways. An Erosion and Sediment Transport Control Plan is also required to be prepared by a qualified SWPPP developer (QSD) to be included in the SWPPP for the Project with construction Best Management Practices (BMPs) such as:

- Prompt revegetation of proposed landscaped areas;
- Perimeter gravel bags or silt fences to prevent off-site transport of sediment;
- Storm drain inlet protection (filter fabric gravel bags and straw wattles), with gravel bag check dams within paved roadways;
- Regular sprinkling of exposed soils to control dust during construction and soil binders for forecasted wind storms;
- Specifications for construction waste handling and disposal;
- Contained equipment wash-out and vehicle maintenance areas;
- Erosion control measures including soil binders, hydro mulch, geotextiles, and hydro seeding of disturbed areas ahead of forecasted storms;
- Construction of stabilized construction entry/exits to prevent trucks from tracking sediment on City roadways;
- Construction timing to minimize soil exposure to storm events; and
- Training of subcontractors on general site housekeeping.

Adherence to the existing requirements and implementation of the appropriate BMPs as ensured through the City's construction permitting process would ensure that the Project would not violate any water quality standards or waste discharge requirements, potential water quality degradation associated with construction activities would be minimized, and impacts (including those to Lake Elsinore) would be less than significant.

Operations. As detailed in the Preliminary WQMP (Appendix E), the Project site naturally drains south to Lake Elsinore. The proposed Project includes operation of warehouse uses, including loading docks, vehicle parking, and landscaping. Potential pollutants associated with the proposed uses include various chemicals from cleaners; sediment from landscaping; trash debris; and oil and grease from vehicles in the parking lots. If these pollutants discharge into surface waters, it could result in degradation of water quality. However, operation of the proposed Project would be required to comply with the requirements of the Santa Ana Regional MS4 Permit through preparation of a project-specific Hydrology Study and Water Quality Management Plan (WQMP) that describes the low-impact development (LID) infrastructure and non-structural, structural, and source control and treatment control BMPs that are included in the Project's design to protect water quality.

The Santa Ana Regional MS4 Permit regulations are included in the LEMC in Chapter 14.08. The MS4 Permit:

- Provides the framework for the program management activities and plan development;
- Provides the legal authority for prohibiting unpermitted discharges into the storm drain system and for requiring BMPs in new development and significant redevelopment;

- Ensures that all new development and significant redevelopment incorporates appropriate Site Design, Source Control, and Treatment Control BMPs to address specific water quality issues; and
- Ensures that construction sites implement control practices that address construction related pollutants including erosion and sediment control and onsite hazardous materials and waste management.

The Santa Ana Regional MS4 Permit requires that new development and significant redevelopment projects (or priority projects), such as the proposed Project, develop and implement a WQMP that includes BMPs and LID design features that would provide onsite treatment of stormwater to prevent pollutants from onsite uses from leaving the site. A WQMP is required to be approved prior to the issuance of a building or grading permit.

The proposed Project would install an onsite drainage and bioretention system to capture and treat stormwater. Stormwater on the Project site would be conveyed to landscape areas and onsite storm drains that would drain to two proposed bioretention basins that would collect, treat, and infiltrate runoff into the site soils. The system is required to be sized to treat runoff from the Design Capture Storm (85th percentile, 24-hour) from the Project site. The Project's WQMP would be reviewed and approved by the City to ensure it complies with the Santa Ana RWQCB MS4 Permit regulations. In addition, the City's permitting process would ensure that all BMPs in the WQMP would be implemented with the Project. Overall, implementation of the WQMP pursuant to the existing regulations would ensure that operation of the proposed Project would not violate any water quality standards, waste discharge requirements, or otherwise degrade water quality; and no new impacts would occur.

The proposed Project would not result in any significant effects relating to water quality; therefore, the proposed Project meets the water quality related criteria of CEQA Guidelines Section 15332(d).

e. Criterion Section 15332(e): Utilities: *The site can be adequately served by all required utilities and public services.*

The utilities necessary to construct and operate the proposed Project (electric, trash, water, and sewage) would be adequately provided by existing utility service systems. The Project site is located in an urbanized and developed area. The proposed Project would connect to existing utility service lines adjacent to the Project site. The proposed Project would install onsite water lines and sewer lines that would connect to the existing 21-inch water main and 18-inch sewer line in Corydon Road. Similarly, onsite electrical systems would be installed on the site and would connect to existing infrastructure within Corydon Road that would be undergrounded along the site frontage as part of the Project. Trash collection services would be arranged prior to the issuance of building permits. All service confirmations would be addressed prior to occupancy. Given the Project size and its location within an area that is currently served by utilities, the site can be adequately served by all required utilities and public services, as detailed below. Therefore, the proposed Project meets the criteria of CEQA Guidelines Section 15332(e).

Water Utility

The proposed Project would install on-site water lines that would connect to the existing 21-inch water main in Corydon Road. The new onsite water system would convey water supplies to the proposed residences and landscaping through plumbing/landscape features that are compliant with the CalGreen Plumbing Code for efficient use of water. The impacts related to installation of the new water lines are included in the analysis herein, such as within the construction traffic, construction air quality, and construction noise analysis.

Water to the City is provided by the Elsinore Valley Municipal Water District (EVMWD). The proposed project would result in an increased demand for water supplies from the two new warehouses and associated landscaping. The EVMWD 2020 Urban Water Management Plan (UWMP) details that demands for water in the EVMWD service area is projected to grow from 29,825 acre feet yearly (AFY) in 2025 to 40,170 AFY in 2045, which is an increase of 10,345 AFY or 34.7 percent. In addition, the UWMP details that water supplies are anticipated to increase from 47,219 AFY in 2025 to 55,328 AFY in 2045, which is an increase of 8,109 AFY of water supply.

The City's General Plan EIR (Table 3.16-9) identifies that limited industrial uses, such as warehousing, would generate a water demand of 900 gallons per acre per day. The Project site is 3.04 acres; thus, the estimated water demand is 2,736 gallons per day, which equates to 3.07 AFY. The Project would limit water demand by inclusion of low-flow plumbing and irrigation fixtures pursuant to the California Title 24 requirements.

The EVMWD's 2020 UWMP estimates water supply of 47,219 AFY and total water demand of 29,825 AFY in 2025, provides for an additional supply of 17,394 AFY. The Project's demand of 3.07 AFY equates to 0.02 percent of the difference in the 2025 supply and demand and equates to 0.03 percent of the increase in water demand between 2025 and 2045. Therefore, the City would have water supplies available to serve the Project. Furthermore, because the Project's uses are consistent with the existing Specific Plan land use designations for the site and buildout of the Specific Plan, which are used to project future water demands. Thus, the demand from the Project is included in the UWMP demand projections. Potential impacts related to water utilities would not occur.

Sewer Utility

The proposed Project would install sewer lines on the site that would connect to the existing 18-inch sewer main in Corydon Road, which has adequate capacity to serve the new residences on the site. The impacts related to installation of the new sewer lines are included in the analysis herein, such as within the construction traffic, construction air quality, and construction noise analysis.

The proposed warehouses would generate new wastewater, which would be conveyed through existing sewer facilities to the Regional Water Reclamation Facility that is located at 31315 Chaney Street in Lake Elsinore. The facility has a regular capacity of 8.0 million gallons per day (MGD) and is going through an expansion to provide an additional 4 MGD of treatment capacity with a projected completion in 2027. The Regional Water Reclamation Facility operated at approximately 81% of its 8 MGD of capacity at the end of FY 2024 (EVMWD Budget FY 2026-2027), which results in an additional capacity of 1.52 MGD.

The City's General Plan EIR (Table 3.16-4) identifies that limited industrial uses, such as warehousing, would generate a wastewater demand of 550 gallons per acre per day. The Project site is 3.04 acres; thus, the estimated water demand for the proposed Project is 1,689 gallons per day, which equates to 0.0017 MGD, and would be accommodated by the current Regional Water Reclamation Plant excess capacity of 1.52 MGD and expanded capacity of 4 MGD more in 2027 when the treatment plant expansion is completed. Therefore, the Project would be adequately served by the existing wastewater system, and no impacts would occur.

Electric

The proposed Project would not utilize natural gas and would be all electric. The Project served by Southern California Edison would connect to the electrical infrastructure in Corydon Road. The Project includes

undergrounding the existing overhead power lines along the site frontage. The impacts related to installation of the new electric lines are included in the analysis herein, such as within the construction traffic, construction air quality, and construction noise analysis. The existing electric utilities would be able adequately serve the Project. All service confirmations would be confirmed by the City prior to issuance of occupancy permits.

Landfills

In 2024, approximately 78 percent of the solid waste from the City of Lake Elsinore, which was disposed of in landfills, went to the El Sobrante Landfill and approximately 17 percent went to the Badlands Sanitary Landfill. The El Sobrante Landfill is permitted to accept 16,054 tons per day of solid waste and is permitted to operate through 2051. In August 2025, a maximum of 12,843 tons in a day was disposed at the El Sobrante Landfill, which provides for a remaining capacity of 3,211 tons per day. The Badlands Sanitary Landfill is permitted to accept 5,000 tons per day of solid waste and is permitted to operate through 2058. In August 2025, a maximum of 3,065.5 tons in a day was disposed at the Badlands Sanitary Landfill, which provides for a remaining capacity of 1,934.5 tons per day.

Construction. Project construction would generate solid waste in the form of packaging and discarded materials. Section 5.408.1 of the California Green Building Standards Code requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste. Thus, the demolition and construction solid waste that would be disposed of at the landfill would be approximately 35 percent of the waste generated. As project construction does not require demolition of any structure, solid waste generated would be limited in comparison to operation wastes. As described above, the El Sobrante Landfill has a remaining capacity of approximately 3,211 tons per day and Badlands Sanitary Landfill has a remaining capacity of 3,065 tons per day. Therefore, the facility would be able to accommodate the limited construction waste generated by the project, and impacts related to landfills during construction would be less than significant.

Operation. The CalEEMod modeling information for the Project (Appendix D) identifies that operation of the Project would generate 45.7 tons of solid waste per year, or 0.88 tons per week. However, at least 75 percent of the solid waste is required by AB 341 to be recycled, which would reduce the volume of landfilled solid waste to approximately 0.22 tons per week. As the El Sobrante Landfill has additional capacity of approximately 3,211 tons per day and Badlands Sanitary Landfill has a remaining capacity of 3,065 tons per day, the solid waste generated by the Project would be within the capacity of the landfill. Thus, the proposed Project would be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs and the Project would result in less than significant operational impacts to landfills.

Fire Services

The Riverside County Fire Department provides fire protection services throughout the City of Lake Elsinore. The Fire Department has four fire stations within 5 roadway miles of the Project site, as listed in Table PS-1. The closest station is Station 61 that is 2.2 miles from the site.

Table PS-1: Fire Stations Serving Project Area

Station	Address	Distance from Site (roadway miles)
#61	32637 Gruwell Street, Wildomar, CA 92595	2.2 miles
#11	33020 Maiden Lane, Lake Elsinore, CA 92530	3.8 miles
#10	410 W. Graham Ave, Lake Elsinore, CA 92530	4.9 miles
#94	22770 Railroad Canyon Rd, Lake Elsinore, CA 92532	5.0 miles

The proposed Project would develop two unrefrigerated warehouses that would each be 24,296 square feet and would have a maximum height of 34 feet 4 inches. The buildings would be constructed with non-flammable cmu walls. Implementation of the project would be required to adhere to the California Fire Code, as included in the City's Municipal Code Chapter 15.56. As part of the permitting process the project plans would be reviewed by the City's Building and Safety Division to ensure that project plans meet the fire protection requirements.

Due to the increase in onsite people that would occur from implementation of the two new warehouses on an undeveloped site, an incremental increase in demand for fire protection and emergency medical services would occur. However, the increase in persons onsite is limited, as the Project is anticipated to generate 13 employees (Appendix D) and would not increase demands such that the four fire stations would not be able to accommodate servicing the Project in addition to its existing commitments. Further, per the Riverside County Fire Department Master Plan, the City falls into the Urban category (GPU EIR). This classification requires a fire station be within three roadway miles of the Project site and have a response time goal of 7 minutes. As shown in Table PS-1, Riverside County Fire Department Station 61 is approximately 2.2 roadway miles from the site. Based on the travel distance from the station to the site, the approximate response time would be four minutes. In addition, The City's Fiscal Year 2025-2026 Operating Budget describes that in Fiscal Year 2024-25 the Fire Department had an average response time of 4.4 minutes, which is under the City's goal of 5 minutes. As such, per the Riverside County Fire Department Master Plan, the Project site would have adequate fire service. Provision of a new or physically altered fire station would not be required that could cause environmental impacts.

Police Services

The City of Lake Elsinore contracts with the County of Riverside Sheriff's Department for police services. The Sheriff Station serving the Project area is the Lake Elsinore Station, located at 333 W. Limited Avenue, Lake Elsinore, CA 92530. The Station is located approximately 4.7 roadway miles from the Project site. Because the Project site is currently vacant, development of the proposed warehouses would result in an incremental increase in demand for law enforcement services. However, the increase would not be significant when compared to current demand levels in the City and would not require the construction or expansion of the City's existing policing facilities. Thus, no impact would occur.

In addition, the Project would be required to comply with the City of Lake Elsinore Municipal Code, which requires a development impact fee (DIF) payment to the City for impacts to public services and facilities,

including sheriff facilities and services. Payment of the DIF fee would ensure that funds are available for either the purchase of new equipment and/or the hiring of additional sheriff personnel to maintain the County's desired level of service for sheriff protection. Therefore, no impacts related to police services would occur.

School Services
The Project site is located within the Lake Elsinore Unified School District that serves over 144 square miles throughout Southwest Riverside County, including the Cities of Lake Elsinore, Canyon Lake, and Wildomar, and several unincorporated County communities. The Lake Elsinore Unified School District operates 12 elementary schools, four middle schools, three comprehensive high schools, two K-through-8 schools, and four alternative education programs.

The Project site is currently within the attendance boundary of the following schools: William Collier Elementary (TK-5) located at 20150 Mayhall Drive, approximately 0.8 miles south of the Project site; Brown Middle School (6-8) located at 21861 Grand Avenue, approximately 3.5 miles southeast of the Project site; and Elsinore High School (9-12) located at 21800 Canyon Drive, approximately 2.2 miles east of the Project site.

The proposed warehouses Project would not generate new housing, and the addition of approximately 13 new employees for the proposed warehouses (per Appendix D) would not generate a substantial increase in population within the City. Future employees of the proposed Project are anticipated to come from the City and surrounding area, children of new employees are expected to already attend schools within the Lake Elsinore Unified School District. Therefore, the increase of approximately 13 employees from the Project would not substantially increase demand on schools and would not result in a need for new or expanded school facilities. Additionally, pursuant to Government Code Section 65995 et seq., the need for additional school facilities is addressed through compliance with school impact fee assessment. SB 50 (Chapter 407 of Statutes of 1998) sets forth a state school facilities construction program that includes restrictions on a local jurisdiction's ability to condition a project on mitigation of a project's impacts on school facilities in excess of fees set forth in the Government Code. These fees are collected by school districts at the time of issuance of building permits for development projects. Pursuant to Government Code Section 65995 applicants shall pay developer fees to the appropriate school districts at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would not occur with the Government Code required fee payments.

Utilities Conclusion
Given the Project size and its location within an area that is currently served by utilities and the information provided above, the Project would be adequately served by all required utilities and public services. Therefore, the proposed Project meets the criteria of CEQA Guidelines Section 15332(e).

5.1 EXCEPTIONS FOR EXEMPTIONS

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this CEQA document also assesses whether any of the exceptions to qualifying for the Class 32 categorical exemption for an Infill Project are present. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 (Exceptions) to the Project.

a. Criterion 15300.2(a): Location: Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly

sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

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

b. Criterion 15300.2(b): Cumulative Impact: *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.* The proposed Project would develop a site that is disturbed, adjacent to similar land uses, and is already served by utilities, public services, and transportation infrastructure. Any construction effects would be temporary, confined to the Project vicinity, and with compliance with existing applicable regulatory requirements, such as SCAQMD Rules and RWQCB regulations that are implemented and verified through the City's development permitting process, impacts would be less than significant.

As explained previously, the Project would generate a limited number of vehicular traffic trips that do not exceed the City's screening threshold. And pursuant to the City's VMT criteria, the Project type (small unrefrigerated warehouses) that would generate less than 110 daily trips would result in impacts related to transportation are less than cumulatively considerable. Similarly, the noise analysis details the limited construction noise and vibration that would be generated during construction activities that would occur within the LEMC Section 17.176.080 allowable times. The Project is not located adjacent to any other identified construction project that could result in a cumulative construction noise impact. Thus, cumulative construction noise impacts would be less than significant.

Also, the operational noise and vibration that would be generated by the Project would not be cumulatively considerable. The 8 a.m. and 9 p.m. peak hour vehicle trips generated by the Project would equate to less than one trips per minute within the p.m. peak hour, which would not generate noise that could be cumulatively considerable. Further, as show previously in Table N-4, the worst case operational noise would generate 54 dBA at a non-residential receptor, which is below the standard of 65. At the closest residence, the Project would generate 45.6, which is below the threshold of 56 dBA. The Project would not generate noise volumes that could be cumulatively considerable; therefore, the Project would result in a less than significant cumulative noise impact.

The SCAQMD's CEQA air quality methodology provides that projects that result in daily emissions that exceed any of the thresholds would have both an individually (project-level) and cumulatively significant air quality impact. As evaluated previously in Tables AQ-1 through AQ-5, the proposed Project would not exceed the SCAQMD's applicable thresholds. Therefore, the Project's operational emissions would not exceed the NAAQS and CAAQS, would not result in a cumulatively considerable net increase of any criteria pollutants or GHG emissions. Thus, the Project would have a less than significant cumulative impact.

The Project would develop the site consistent with the East Lake Specific Plan and would reallocate approximately 50,000 square feet of the Industrial Development Target from Specific Plan Area 2 to Specific Plan Area 3 where the proposed warehouses are to be located. Thus, the growth related to the proposed

Project is consistent with the development assumed by the East Lake Specific Plan and would not be cumulatively considerable. Further, as detailed herein, the proposed Project would not result in any potentially significant impacts that have the potential to cumulatively combine. No potential cumulative impacts would result from the Project. Therefore, the exception under CEQA Guidelines Section 15300.2 (b) does not apply to the Project.

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

There are no known unusual circumstances that are applicable to the Project, and which may result in a significant effect on the environment. The proposed Project consists of the development of the site for light industrial/ warehousing uses, adjacent to existing similar uses, within a developed area that is served by utilities and transportation. The Project would be consistent with the City's East Lake Specific Plan designation of allowable uses and requirements, as detailed in previous responses. The Project also proposes a Minor Modification to the East Lake Specific Plan to reallocate approximately 50,000 square feet of the Industrial Development Target allocated from Specific Plan Area 2 to Specific Plan Area 3. This would ensure that the total square footage of the Specific Plan buildout would be maintained as intended. Also, the Project includes a Minor Modification to expand the Airport Overlay designation to include the existing Skylark Airport. This overlay extension would provide that development within the Skylark Airport would be consistent with the surrounding overlay area, which would reduce the potential of future unusual circumstances. Overall, the Project would be Implemented in a manner consistent with existing City planning and would not introduce a new activity to the area that could result in a significant effect on the environment. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the Project.

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

The Project site is not located within a state scenic highway. The closest scenically identified roadway is I-15, which is an Eligible State Scenic Highway and is located over 1.3 miles east of the Project site. Due to the distance between the site and I-15, there are no potential views of the Project site from motorists on the I-15.

The proposed Project would develop the undeveloped site with two warehouse buildings that would be 34 feet 4 inches high, and consistent with adjacent and nearby industrial/warehousing developments. The proposed size and height of the building would blend into the existing views of the urban area and would not encroach into views related to I-15. The buildings would be consistent with the height of existing nearby buildings in the area. Thus, views from the I-15 of the Project site would not change; and the proposed Project would not result in damage to scenic resources related to the Eligible State Scenic Highway.

In addition, the Project site is undeveloped and does not contain any historic-period structures. Similarly, the developed areas surrounding the Project site contain modern structures, and industrial facilities that are not historic buildings. Therefore, the proposed Project would not cause damage to historic buildings within a state scenic highway. In addition, the Project site and surrounding areas are developed and do not contain rock

outcroppings. Thus, scenic resources related to rock outcroppings would not occur from implementation of the Project. The trees that are located within and surrounding the Project site are non-native ornamental landscaping, which do not consist of significant scenic resources. The Project would install new drought tolerant low water use ornamental landscaping that would include groundcovers, shrubs, and trees that would be consistent with the City's landscaping requirements. The Project would not damage scenic resources related to trees within a state scenic highway. As such, no impacts to scenic resources within a state scenic highway would occur from implementation of the proposed Project. Therefore, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project.

e. Criterion 15300.2(e): Hazardous Waste Sites: ***A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code.***

The Project site is a vacant undeveloped site that does not contain any identified hazardous waste. A review of the California Department of Toxic Substances Control EnviroStor database identifies that the Project site and adjacent areas do not contain hazardous waste sites and are not on any list complied pursuant to Section 65962.5 of the Government Code. Therefore, this exception is not applicable.

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

CEQA defines a historical resource as something that meets one or more of the following criteria: (1) listed in, or determined eligible for listing in, the California Register of Historical Resources; (2) listed in a local register of historical resources as defined in Public Resources Code (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 CEQA Guidelines Section 15064.5[a]).

The California Register defines a "historical resource" as a resource that meets one or more of the following criteria: (1) associated with events that have made a significant contribution to the broad patterns or local or regional history of the cultural heritage of California or the United States; (2) associated with the lives of persons important to local, California, or national history; (3) 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; or (4) has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

The Project site is a vacant undeveloped site that does not contain any structures or historic resources. The site is surrounded by a chain linked fence and comprised of sparse non-native vegetation. The site is adjacent to undeveloped parcels and modern industrial warehousing buildings on the northwest side of Corydon Road. Thus, there are no historic or potentially historic resources on the Project site that could be impacted. Neither the site or the surrounding properties are strongly associated with events that have made a significant contribution to the broad patterns of national or state history or with significant persons from the past. The site does not contain historic resources or yield information important to history of prehistory. As a result, the Project would not result in impacts to historic resources; and this exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

Conclusion

On the basis of the evidence provided above, the Project is eligible for a Class 32 Categorical Exemption in accordance with Section 15332, *Infill Development Projects*, of the CEQA Guidelines. Because the proposed Project meets the criteria for categorically exempt infill development projects listed in CEQA Guidelines Section 15332 and it would not have a significant effect on the environment, this analysis finds that a Notice of Exemption may be prepared for the proposed Project.

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