

# COUNTY OF RIVERSIDE

## ENVIRONMENTAL ASSESSMENT FORM: INITIAL STUDY

**Environmental Assessment (CEQ / EA) Number:** TBD

**Project Case Type (s) and Number(s):** PK-9703

**Lead Agency Name:** Riverside County Planning Department

**Address:** 21470 Gavilan Road, Perris, CA

**Contact Person:** Analicia Gomez, Senior Park Planner

**Telephone Number:** (951) 955-6515

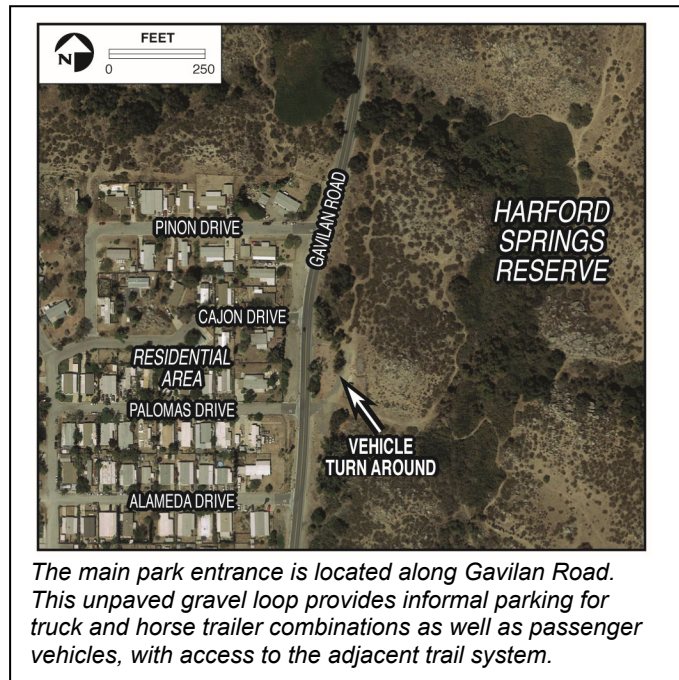
**Applicant's Name:** Riverside County Regional Park and Open Space District (RivCoParks)

**Applicant's Address:** 4600 Crestmore Road, Jurupa Valley, CA 92509

### I. PROJECT INFORMATION

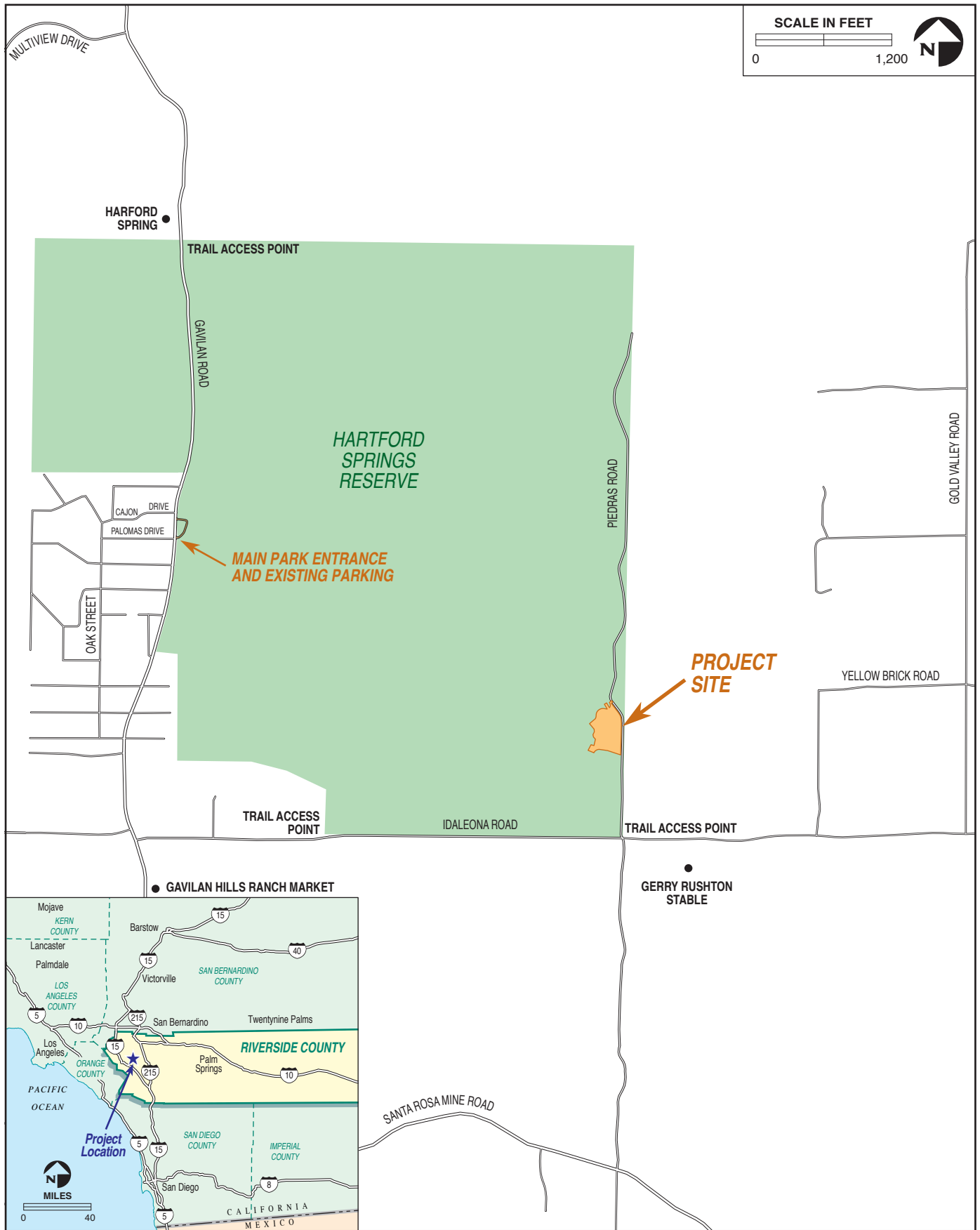
#### Project Description

Harford Springs Reserve (Park) is an approximately 325-acre undeveloped open space, located in the western region of unincorporated Riverside County, which is owned and managed by Riverside County Regional Park and Open-Space District (RivCoParks) (see Figure 1). The main entrance to the Park is located east of Gavilan Road between Palomas Drive and Cajon Drive, along the western border of the Park (see Figure 1). The unpaved gravel loop at this location provides informal parking for approximately 1 to 2 truck and horse trailer combinations as well as 4 to 6 passenger vehicles. During periods of peak demand (e.g., during the morning on the weekends in the Spring and Summer), many visitors park their vehicles on the street along Gavilan Road or in the dirt parking area at the Gavilan Ranch Market, located to the south at the corner of Gavilan Road and Idaleona Road (see Figure 1).



The proposed Project would create an approximately 1.8-acre day use parking and staging area (Project site) in the southeast corner of the Park, located immediately west of Piedras Road, approximately 750 feet from the intersection of Piedras Road and Idaleona Road. The proposed day use parking and staging area would provide additional parking for approximately 10 truck and horse trailer combinations, including 1 space that would meet Americans with Disability Act of 1990 (ADA) requirements, and 5 parking spaces for passenger vehicles, including 1 space that would meet ADA requirements. Additionally, the day use parking and staging area would provide additional recreational amenities including hitching posts and picnic tables.

Development of the proposed day use parking and staging area would involve minimal vegetation clearing and grubbing, rough and finish grading, base compaction, limited concrete paving for ADA spaces, delineation of individual parking spaces, and construction of a perimeter split rail fence.



Harford Springs Reserve  
Project Vicinity

**FIGURE  
1**

RivCoParks conducted several public outreach meetings to inform the community, identify public concerns, and provide an opportunity to gather comments and input on the scope of the proposed Project. The first public meeting on February 19, 2019 included several RivCoParks staff and approximately 50 community members. The primary community concerns that were identified during this initial public meeting included illegal activity (e.g., dumping, off-highway vehicle [OHV] use, etc.), speeding along Idaleona Road, security within the Park and at the private properties farther north off Piedras Road, and adding Park rangers. On April 25, 2019, RivCoParks hosted a subsequent meeting with the Greater Lake Mathews Rural Trail Association (GLMRTA) to present the preliminary project design for the proposed day use parking and staging area. The GLMRTA expressed concerns regarding line-of-sight truck and horse trailer combinations turning onto and off of Piedras Road. The GLMRTA also suggested the design remain minimal and to maximize parking at the site. During another meeting with the GLMRTA on February 27, 2020, RivCoParks presented a revised design. RivCoParks requested that the GLMRTA “adopt” the day use parking and staging area to assist with maintenance and discussed the GLMRTA’s concerns regarding site security.

### Project Site and History

As previously described the Park is located in the western region of unincorporated Riverside County, and generally boarded by unincorporated open space to the north, south, and west as well as a small rural residential neighborhood to the east. Regional access to the Park is provided by Interstate 215 (I-215), Interstate 15 (I-15), California State Route 74 (Route 74), and California State Route 91 (Route 91) (refer to Figure 1). Local access to the Park is provided by Gavilan Road, which is a two-lane roadway that provides local north-south access, and Idaleona Road, which is an unmarked paved road that provides local east-west access. As previously described, the main entrance to the Park is provided east of Gavilan Road between Palomas Drive and Cajon Drive, along the western border of the Park (see Figure 2). In addition to the unpaved gravel loop and informal parking, the main park entrance also includes a bulletin board and trails map, dumpster, and portable toilet for visitors.

A secondary entrance to the Park is provided by Piedras Road, located approximately 125 feet north of its intersection with Idaleona Road. Piedras Road begins as a paved road but becomes a dirt road shortly past a wooden gate that marks the entrance to the Park. The road is approximately 16 feet wide near the gate and extends for approximately 4,800 feet (0.90 miles), running along the eastern edge of the Park. This



*The main park entrance is an unpaved gravel loop located along Gavilan Road. This area is marked by a sign, but otherwise provides limited recreational amenities.*



*The day use parking and staging area would be located off of Piedras Road where it intersects Idaleona Road. A wooden gate marks the existing pedestrian entrance on the southern edge of the Park.*

secondary entrance serves as a trail access point for hikers and equestrians. However, no parking or other recreational amenities are provided.

The Park is named after the original property owner, Henry Morey Harford, a rancher, publisher, and realtor who moved to the City of Perris in 1900. His property was a popular spot for nature enthusiasts, and in 1960 the County was looking for potential park space in the region. The County and the property owner, Harford’s daughter, worked on an agreement for 10 years until the County’s purchase was finalized officially in 1970 (Lech 2020). The Park is currently owned and managed RivCoParks and is open every day from 8:00 AM to sunset.



*Harford Springs Reserve provides a variety of trails through diverse topographies and habitat types.*

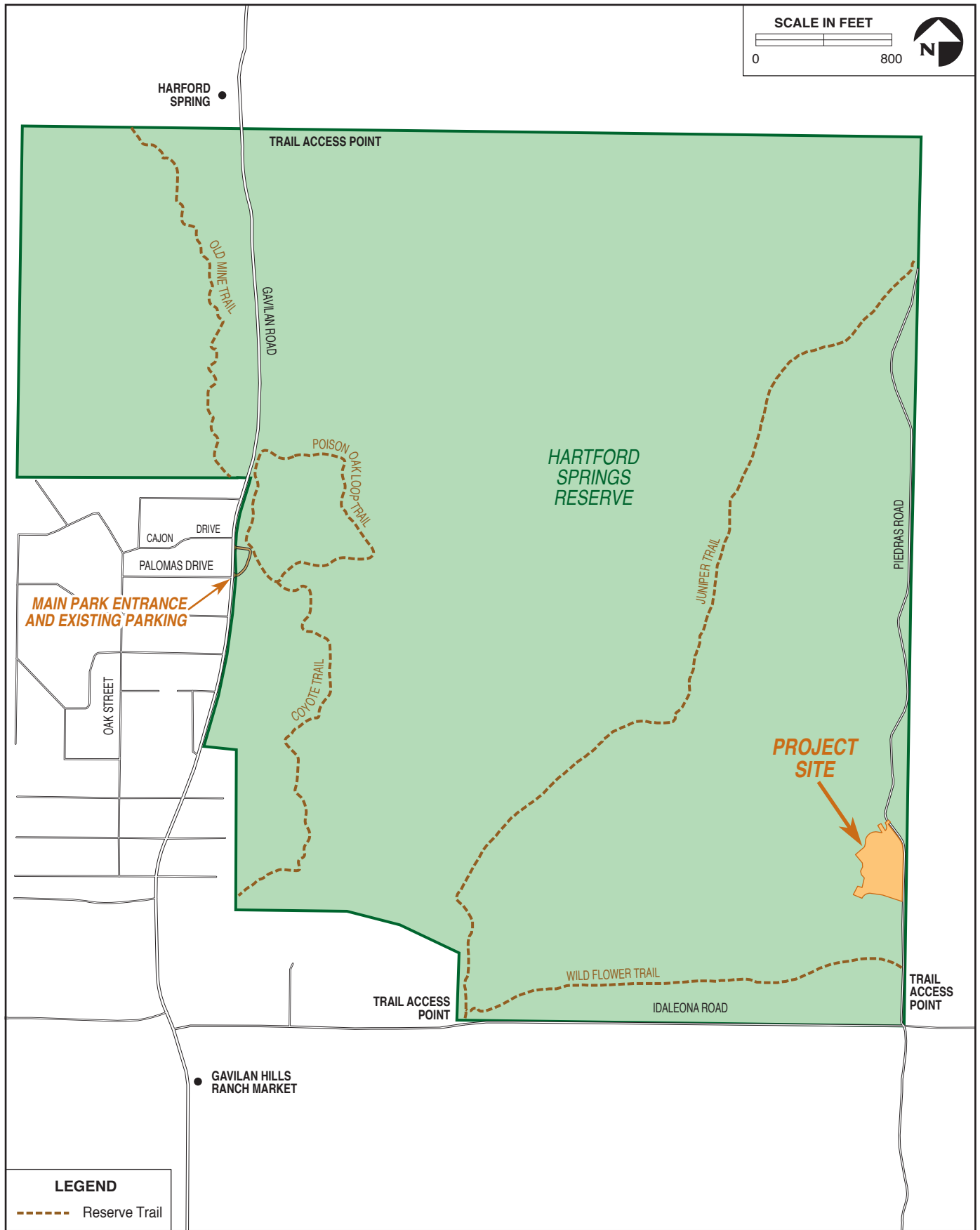
The Park provides 13 miles of trails (see Table 1 and Figure 2), which are popular for moderately challenging hiking, running, mountain biking, and equestrian use as well as wildlife viewing and nature photography.

**Table 1. Trails within Harford Springs Reserve**

Trail	Length (miles)	Trail Access Point
11 West	0.31	On Gavilan Road
11 East	0.35	On Gavilan Road
Connector C	0.06	Off 11 East
Trail 4	0.20	Off 11 East
Connector B	0.21	Off 11 East
Trail 1	1.08	Idaleona Road
Trail 14	0.31	Trail 1
Trail 15	0.26	Trail 1
Trail 6	0.29	Trail 1
Connector D	0.06	Piedras Road
Connector G	0.09	Piedras Road
Trail 3	0.51	Idaleona Road
Trail 12	0.61	Piedras Road
Trail 10	0.31	Trail 1, Trail 12
Trail 2	0.74	Trail 1
Trail 8	0.23	Trail 12, Trail 9
Trail 9	0.47	Gavilan Road
Connector E	0.15	Trail 8, Trail 16
Trail 16	0.36	Gavilan Road
Trail 13	0.23	Gavilan Road
Trail 5	0.22	Trail 2

Source: RivCoParks 2010.

RivCoParks conducts trails maintenance and erosion control activities, as necessary, on all trails at least once per year. Weed abatement is conducted near residential areas to remove potential ladder fuels. Additionally, RivCoParks conducts weed eating activities, trash pickup, and tree trimming approximately two to three times per year. Typically, work is completed by 2 rangers, 1 park maintenance worker, and 3 to 4 work release workers.



Approximately 1,000 to 1,500 people visit the Park annually, with more visitors during years with large wildflower blooms. Peak demand generally occurs in the Spring and Summer months, when between approximately 20 to 50 people visit the Park every week. However, during equestrian events at the Park, there can be up to 50 to 75 riders during a single day.

The number of visitors – particularly during the Spring and Summer months – overwhelm the limited number of informal parking spaces available at the main park entrance. Truck and horse trailer combinations as well as passenger vehicles often park on the side of Gavilan Road and Piedras Road, which can restrict access to the entrance for wider truck and horse trailer combinations. Visitors also park at the Gavilan Ranch Market, located



*During peak periods, visitors often park at Gavilan Ranch Market, located less than 1 mile from the southeastern edge of the Park.*

on Gavilan Road, approximately 600 feet south of Idaleona Road. During equestrian events or other peak periods, the store's parking lot has been completely full with 15 or more truck and horse trailer combinations. Not only does this interrupt business at the store, it also presents potential safety hazards for hikers, runners, mountain bikers, and equestrians traveling along Gavilan Road or across Idaleona Road to reach the trail access points (refer to Figure 2). To address the visitor parking constraints at the Park, RivCoParks, in conjunction with community members and the GLMRTA, began investigating the possibility of developing an equestrian, day use parking and staging area within the southeastern portion of the Park. The proposed Project site was chosen because it provides sufficient space, relatively flat terrain, minimal/disturbed vegetation, and an existing unpaved access road from Idaleona Road.

## **Proposed Project Components**

### *Vehicle Parking*

Under the proposed Project, the approximately 1.8-acre Project site would be cleared and grubbed and small to medium sized boulders encountered on-site would be relocated to the perimeter. Four California juniper trees (*Juniperus californica*) located within the footprint of the Project site would be removed with the stumps of these trees ground to 12 inches below the finished surface of the proposed day use parking and staging areas. The Project site would be leveled with minor grading necessary to maintain existing surface water drainage, which would continue to be directed from the east towards the interior of the Park to the northwest (see Section 23, *Water Quality Impacts*).

Concrete flatwork would be required for the ADA-accessible truck and horse trailer combination space as well as the ADA-accessible passenger vehicle space. Two 6-inch-thick reinforced concrete pads would be constructed in these areas and disable parking signs would be installed. The remainder of the proposed day use parking and staging area would be covered with native soil and stabilizers.

The unpaved loop would provide parking for approximately 10 truck and horse trailer combinations with trucks entering through the northernmost entry and parking along the edge of the loop. The passenger vehicle parking spaces would be located along the southern end of the proposed day use parking and staging area and would be striped or delineated using small rocks or down branches. Vehicles would exit the loop using the southernmost split exit, which would allow vehicles to turn left along Piedras Road

to re-enter the unpaved loop or turn right along Piedras road to exit the Park. Vehicles would be prevented from traveling past the day use parking and staging area into the Park by a pipe gate that would be installed as a part of the proposed Project (see Figure 3).

The proposed day use parking and staging area would be surrounded by split rail fencing and relocated boulders along the perimeter with entrances to the existing trails (see Figure 3).

### *Additional Recreational Amenities*

The proposed day use parking and staging area would include five precast concrete picnic tables located between the ADA-accessible truck and horse trailer combination and passenger vehicle parking spaces. This area would be covered by 3 inches of decomposed granite. One 6-inch by 6-inch wooden hitching post would be located to the north of the proposed day use parking and staging area, three hitching posts would be located to the south of the picnic tables, and five precast concrete trash receptacles would be located throughout the Project site near the hitching posts, parking areas, and trail access points (see Figure 3).

### **Construction**

The primary heavy construction activities associated with the proposed Project would be limited to grading and concrete flatwork associated with the ADA-accessible spaces. Installation of split rail fencing, picnic tables, trash receptacles, etc. would generally be accomplished using hand tools.

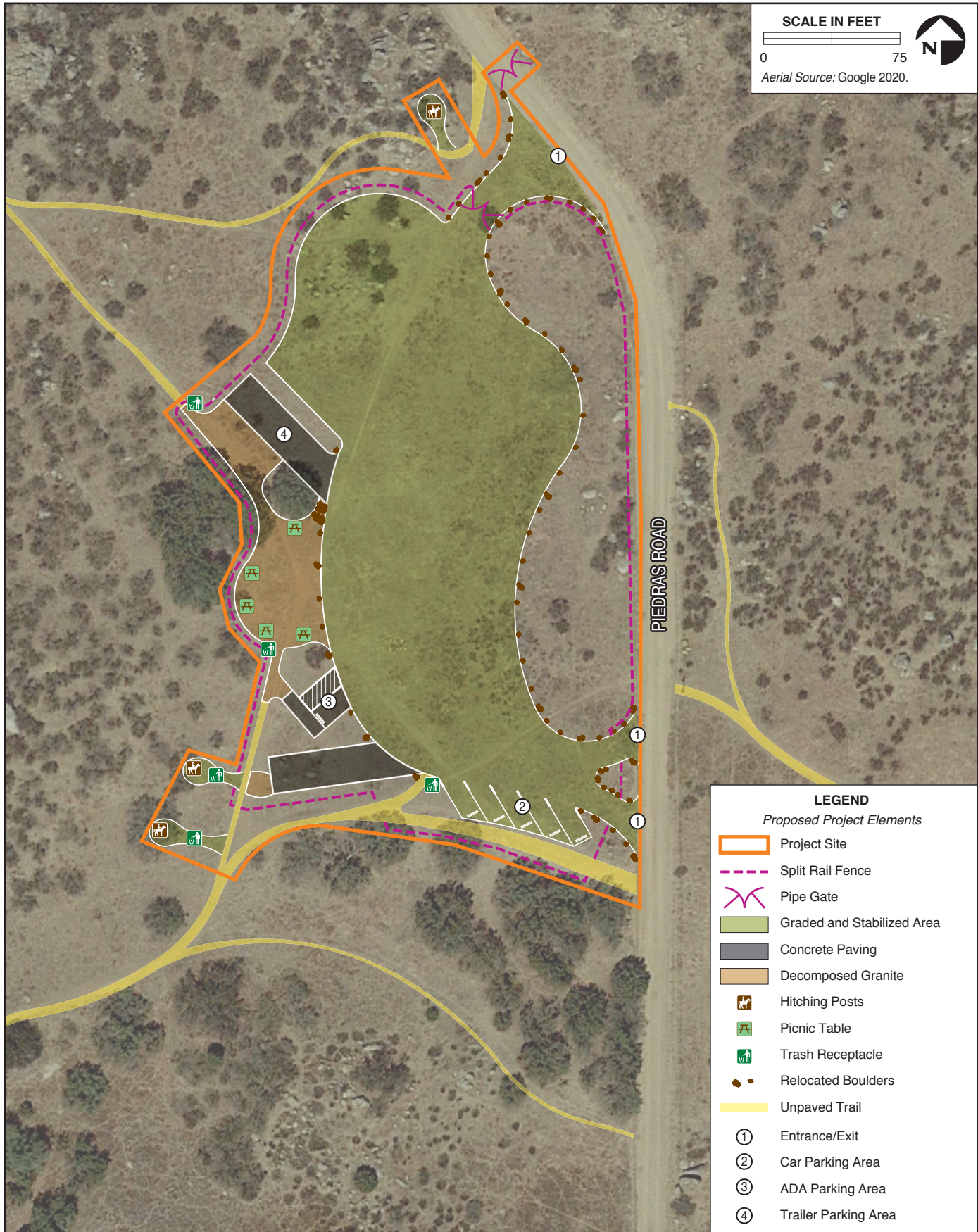
In total, the proposed construction activities would require approximately 1.8 acres of grading. The maximum depth of cut and fill would be approximately 2 feet, with 500 cubic yards (cy) of total earthwork. However, soil would be balanced site, with no soil export or import of fill material required for the proposed Project.

Heavy haul trucks used to deliver equipment and materials to the Project site would access the Project site from Gavilan Road turning east onto Idaleona Road and turning north onto Piedras Road to access the Project site. The materials laydown and construction staging area would be located on the Project site in the area that would become the unpaved gravel loop. Heavy construction equipment would remain in the construction staging area throughout the duration of construction. It is estimated that 1 to 7 construction workers would be required depending of the phase of construction (see Table 2).

### *Construction Timing*

Construction activities would be minimal and the timeline would be heavily dependent on the lead time of purchasing and delivering precast concrete picnic tables and waste receptacles, which would take between 6 to 8 weeks. For the purposes of analysis, it has been assumed that construction activities would occur intermittently over an estimated 2- to 3-month period beginning in Summer 2020.

Public construction projects and facilities owned or operated by or for a governmental agency are exempt from the County's Noise Ordinance (Ordinance Number 847; Riverside County 2007). Although the proposed Project is exempt from limitations on construction hours, to the maximum extent feasible, RivCoParks would voluntarily limit construction activities to the hours between 6:00 AM and 6:00 PM during the months of June through September, and between 6:00 AM and 7:00 PM during the months of October through May, consistent with requirements codified in the County's Noise Ordinance for private construction projects located within 0.25 miles of a residence.





The proposed construction timeline, staffing, and equipment needs are described in Table 2 below:

**Table 2. Construction Activities and Timeline**

Activity	Timeframe	Equipment	Daily Workers
Mobilization and securing site	1 week	18-wheel truck for delivery of heavy equipment for grading, stake bed truck for bringing temporary fencing for staging/laydown area	3-5
Grading and boulder placement	3 weeks	Bulldozer, skiploader, motor grader, wheel compactor, 18-wheel truck/trailer to haul heavy equipment after grading is complete	3-5
Concrete forming and placing	2 weeks	Crew trucks, 10-wheel cement mixer	5-7
Fencing and hitching posts	3 weeks	Stake bed trucks, crew trucks	3-5
Installing site furnishings	1 week (concurrent with fencing)	Articulated lift, 18-wheel delivery truck, crew truck	3-5
Signage, striping	1 week (concurrent with fencing)	Crew trucks	1-2
Clean up and demobilization	1 week	Crew trucks	1-2

**Required Agency Approvals**

As discussed in Section 7, *Wildlife & Vegetation* the Project site located within the Criteria Area of the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP). Therefore, the proposed day use parking and staging area would be subject Joint Project Review (JPR) process by the Western Riverside County Regional Conservation Authority (RCA). The proposed Project would use the “take” permits granted under the MSHCP instead of having to obtain separate permits or negotiated with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW).

**A. Type of Project:** Site Specific ; Countywide ; Community ; Policy .

**B. Total Project Area:**

Residential Acres: N/A	Lots:	Units:	Projected No. of Residents:
Commercial Acres: N/A	Lots:	Sq. Ft. of Bldg. Area:	Est. No. of Employees:
Industrial Acres: N/A	Lots:	Sq. Ft. of Bldg. Area:	Est. No. of Employees:
Other: 1.8 acres			

**C. Assessor’s Parcel No(s):** 287-280-012-2

**Street References:** North of Idaleona Road and west of Piedras Road

**D. Section, Township & Range Description or Reference/Attach a Legal Description:** The Project site is located on the western edge of Section 19 in Township 4 South, Range 4 West, of the San Bernardino Baseline and Meridian, County of Riverside, State of California.

**E. Brief description of the existing environmental setting of the project site and its surroundings:**

The Park is located within unincorporated Riverside County, west of the City of Perris and the unincorporated area of Mead Valley, and south of the unincorporated area of Woodcrest. The Park is approximately 3 miles east of the Lake Mathews Estelle Mountain Reserve and 4 miles southeast of Lake Mathews. The Park is generally bordered by Gavilan Road to the west, Idaleona Road to the south, and Piedras Road to the east. Gavilan Hills Ranch Market is located approximately 0.25 miles from the southwestern corner of the Park (refer to Figure 1 and Figure 2). The Park is surrounded by undeveloped open space to the north, south, and east and a small rural residential neighborhood to the west. There is a horse stable and one single family rural residence within 0.25 miles of the Project site, located directly south across Idaleona Road. No other residences are located within 0.25 miles of the Project site.



*Existing parking at the main park entrance is limited to a small paved and gravel area off of Gavilan Road on the eastern border of the Park.*

Several field surveys and associated technical reports have been prepared for the proposed Project, including a MSHCP Consistency Analysis (Amec Foster Wheeler Environment & Infrastructure, Inc. [Amec Foster Wheeler] 2018b; see Appendix A), Jurisdictional Delineation (Wood Environment & Infrastructure Solutions, Inc. [Wood] 2020; see Appendix B), and Extended Phase I Cultural Resources Inventory (Amec Foster Wheeler 2018a; see Appendix C). These field surveys and technical reports provide the description of the existing setting for the Project site and the surrounding vicinity.

The Project site is generally located at an elevation of 2,000 to 2,050 feet above mean sea level. This area is characterized by the Vista soil series, which includes moderately deep, well drained soils that formed in material weathered from decomposed granitic rocks. Vista soils are generally located on hills and mountainous uplands and have slopes of 2 to 85 percent. In Southern California – including Riverside County – Vista soils are located on hilly slopes at elevations of 400 to 3,900 feet. They are well drained with slow to rapid runoff and moderately rapid permeability (Amec Foster Wheeler 2018b; U.S. Department of Agriculture Natural Resources Conservation Service 2017).

The Project site is located within the Santa Ana watershed, where the average rainfall is approximately 8.23 inches per year. Surface water runoff within the region generally originates from the south, flows to the north into Lake Mathews, and then flows to west for approximately 4 miles before reaching the Temescal Creek. The drainage continues for approximately 6 miles until it reaches the Prado Flood Control Basin. Water is then drained southwest by the Santa Ana River approximately 29 miles until it reaches the Pacific Ocean (Wood 2020).

The Project site is located approximately 300 feet to the north of an un-named drainage that conveys natural surface water flows and urban run-off from the surrounding single-family rural residences and commercial land uses (see Figure 4). However, this drainage path supports only intermittent flows that occur during and immediately following heavy storm events and shows no evidence of an ordinary-high-water mark (OHWM) and/or definable bed and bank feature. Two partially buried culverts are located beneath Piedras Road; however, these culverts have not conveyed any recent flows. A clearly defined

bed and bank feature is located approximately 0.5 miles downstream to the west, which is where the jurisdictional drainage feature begins (Wood 2020).

The Project site is located in an area known for underground springs, hence the name Harford Springs Reserve. There are sparse individual willows within the headwaters, but these are in extremely poor health and are likely associated with deep roots that tap into the underground springs. In years of drought, these trees die-back. During years of average to above average rainfall, these willows may show signs of recovery. Within the vicinity of the Project site, the individual willows are sparse and would not be classified as a riparian habitat (Wood 2020).

Four primary vegetation types are located within the vicinity of the Project area (see Figure 4), including:

- **Grassland:** The Project site generally is characterized by the grassland vegetation community (see Figure 4), which is primarily composed of annual plant species dominated by several grasses. These include slender wild oat (*Avena barbata*), red brome (*Bromus madritensis* ssp. *rubens*), and soft chess (*Bromus hordeaceus*). There is a component of native and non-native forbs such as Russian thistle (*Salsola tragus*), turkey mullein (*Croton setiger*), and Maltese star-thistle (*Centaurea melitensis*).

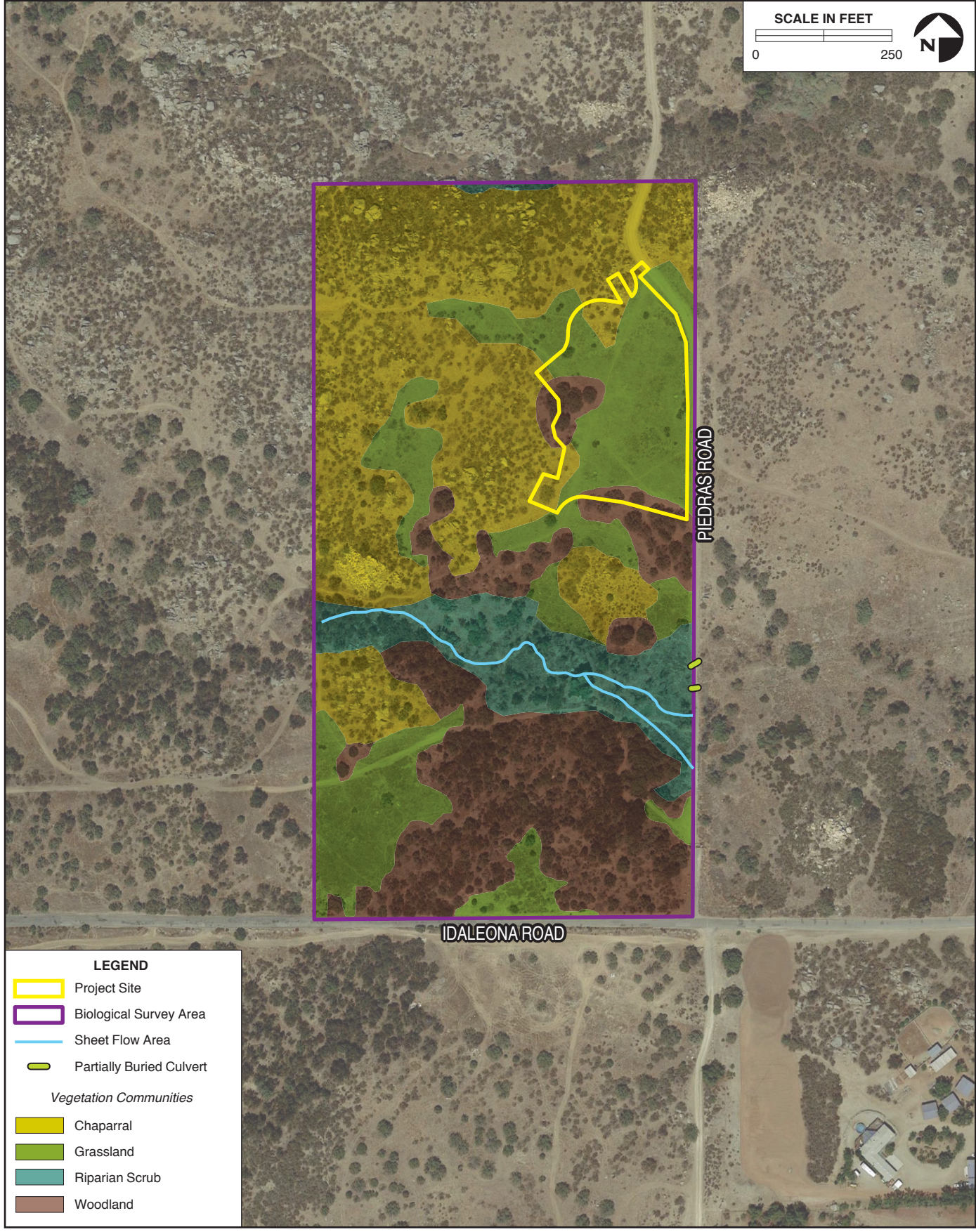


Existing vegetation at the Project site is generally limited to annual grasses and low growing shrubs.

- **Woodland and Forests:** The Project site includes small patches of the woodland and forests vegetation community. Within the Project site and the immediate vicinity this vegetative community includes scrub oaks (*Quercus berberidifolia*) and California juniper. Larger blocks of this vegetation community are located further south of the Project site adjacent to Idaleona Road (see Figure 4).



Juniper and oak dominated woodlands are located to the south of the Project site.



**LEGEND**

- Project Site
- Biological Survey Area
- Sheet Flow Area
- Partially Buried Culvert

*Vegetation Communities*

- Chaparral
- Grassland
- Riparian Scrub
- Woodland

- **Chaparral:** The Project site includes a small patch of chaparral to the southwest. This vegetation community occurs to the north and to the west of the Project site (see Figure 4). Chaparral is a shrub-dominated vegetation community that is composed relatively largely of evergreen species that range from 3 to 12 feet in height. The most common and widespread species within chaparral vegetation community is chamise (*Adenostoma fasciculatum*). Other common shrub species include oak (*Quercus* spp.) and redberry (*Rhamnus* spp.). Subshrubs are less common in this community but occur within canopy gaps of mature stands. Common species include California buckwheat (*Eriogonum fasciculatum*), sages (*Salvia* spp.), and monkeyflower (*Mimulus* spp.).



Chaparral and rock outcrops are located to the north and to the west of the Project site.

- **Riparian Scrub:** This vegetation community, which occurs approximately 300 feet to the south of the Project site, include elements of southern riparian scrub and southern cottonwood willow riparian forest, which are both considered special-status vegetation communities by the CDFW. These riparian communities are dominated by trees and shrubs, including willows (*Salix* spp.), mule fat (*Baccharis salicifolia*), Fremont cottonwood (*Populus fremontii*), blue elderberry (*Sambucus nigra* ssp. *caerulea*), and saltcedar (*Tamarix* spp.). As previously described, natural runoff in this area sheet flows during and immediately following heavy storm events; However, there is no evidence of an ordinary-high-water mark (OHWM) and/or definable bed and bank feature (see Section 7, *Wildlife & Vegetation*).

Some of the most common vertebrate species observed on the Project site and in the surrounding vicinity include red-tailed hawk (*Buteo jamaicensis*), Anna’s hummingbird (*Calypte anna*), mourning dove (*Zenaida macroura*), black phoebe (*Sayornis saya*), Audubon’s cottontail (*Sylvilagus audubonii*), California ground squirrel (*Otospermophilus beecheyi*), and western fence lizard (*Sceloporus occidentalis*). A literature review conducted in preparation of the MSHCP Consistency Analysis showed that there are 83 special status biological resources known to occur within a 5-mile radius of the Project site. These include 26 plant species, 4 vegetation communities, 2 invertebrates, 1 amphibian, 8 reptiles, 12 birds, and 4 mammals (Amec Foster Wheeler 2018b; see Section 7, *Wildlife & Vegetation*).

Two cultural resources – an isolated hole-in-top can (P-33-028090) and a campsite (P-33-028089) – were discovered during the Extended Phase I Cultural Resources Inventory (Amec Foster Wheeler 2018a). However, it was determined that neither the hole-in-top can nor campsite were eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) (Amec Foster Wheeler 2018a; see Section 8, *Historical Resources*). Therefore, these resources do not qualify as “historical resources” under the California Environmental Quality Act (CEQA) or as Riverside County Landmark. No other prehistoric or tribal cultural resources were encountered at the Project site (Amec Foster Wheeler 2018a; see Section 39, *Tribal Cultural Resources*).

## II. APPLICABLE GENERAL PLAN AND ZONING REGULATIONS

### F. General Plan Elements / Policies:

1. **Land Use:** The Project site is located within the Lake Mathews / Woodcrest Area Plan and is designated as Open Space-Conservation Habitat (OS-C H). This land use designation applies to public and private lands conserved and managed in accordance with an adopted MSHCP or other Conservation Plan(s) and in accordance with related Riverside County policies. Ancillary structures or uses may be permitted within this land use designation for the purpose of preserving or enjoying open space (Riverside County 2019a).
2. **Circulation:** All materials laydown and construction staging would occur with the Project site, limiting potential transportation impacts along Gavilan Road, Idaleona Road, and Piedras Road. The proposed Project would not measurably affect any other transportation facilities referenced in the General Plan and meets all applicable circulation policies (Riverside County 2017).
3. **Multipurpose Open Space:** The proposed Project does not include drinking fountains or permanent restrooms facilities. As such there would be no increase in demand for domestic water or wastewater facilities. There are no agricultural, forest, mineral, or energy resources at the Project site.
4. **Safety:** The proposed Project does not include any habitable structures that may be impacted by geologic and/or flood hazards. The Project is in a state-designated very high fire hazard severity zone; however, the entrance to the Park is located approximately 2.5 miles from the closest fire station and the implementation of the proposed Project would not increase the risk of fire hazards (Riverside County 2019b; see Section 44, *Wildfire Impacts*). The proposed day use parking and staging area would have a boundary sign prohibiting hunting, fires, shooting, and other potential ignition sources. Similar signage is also at the existing main park entrance and every 300 feet along Gavilan and Idaleona Road. Additionally, RivCoParks would continue to conduct regular weed abatement to reduce ladder fuels 100 feet from residences.
5. **Noise:** The Park is surrounded by undeveloped open space to the north, south, and east and a small rural residential neighborhood to the west. There is a horse stable and one single family rural residence within 0.25 miles of the Project site, located directly south across Idaleona Road. No other residences are located within 0.25 miles of the Project site. Construction activities would comply with the County Noise Ordinance (Riverside County 2007; see Section 27, *Noise Effects by the Project*) and long-term noise compatibility issues as a result of the proposed day use parking and staging area would not be anticipated.
6. **Housing:** The proposed Project does not include the construction of housing and would not create permanent employment opportunities which would require housing.
7. **Air Quality:** Construction activities would be short-term and temporary with emissions that would be below the South Coast Air Quality Management District (SCAQMD) thresholds (see Section 6, *Air Quality Impacts*). Operation of the proposed Project would not include activities that would result in additional new stationary or mobile air emissions. The proposed day use parking and staging area would provide parking for visitors that are already accessing the Park.
8. **Healthy Communities:** The proposed Project would provide increased access to recreational open space, providing safe opportunities for recreation and physical activities.

**9. Administration:** Not applicable to the proposed Project.

**10. Environmental Justice:** As of May 2020, the Environmental Justice Element has not been adopted.

**11. General Plan Area Plan(s):** Lake Mathews / Woodcrest Area Plan

**G. Foundation Component(s):** Open Space

**H. Land Use Designation(s):** Open Space-Conservation Habitat (OS-C H)

**I. Overlay(s), if any:** Western Riverside County Multiple Species Habitat Conservation Plan

**J. Policy Area(s), if any:** Gavilan Hills Policy Area

**K. Adjacent and Surrounding:**

**1. General Plan Area Plan(s):** Lake Mathews / Woodcrest Area Plan

**2. Foundation Component(s):** N/A

**3. Land Use Designation(s):** Open Space-Conservation Habitat (OS-C H)

**4. Overlay(s), if any:** N/A

**5. Policy Area(s), if any:** Gavilan Hills Policy Area

**L. Adopted Specific Plan Information**

**1. Name and Number of Specific Plan, if any:** Lake Mathews / Woodcrest Area Plan

**2. Specific Plan Planning Area, and Policies, if any:** Gavilan Hills Policy Area; policies focus on regulating future residential development in the area.

**M. Existing Zoning:** Natural Assets (N-A)

**N. Proposed Zoning, if any:** N/A

**O. Adjacent and Surrounding Zoning:** Specific Plan (S-P)

### III. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below ( x ) would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” or “Less than Significant with Mitigation Incorporated” as indicated by the checklist on the following pages.

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

### IV. DETERMINATION

On the basis of this initial evaluation:

<b>A PREVIOUS ENVIRONMENTAL IMPACT REPORT / NEGATIVE DECLARATION WAS NOT PREPARED</b>
<input type="checkbox"/> I find that the proposed project <b>COULD NOT</b> have a significant effect on the environment, and a <b>NEGATIVE DECLARATION</b> will be prepared.
<input checked="" type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project, described in this document, have been made or agreed to by the project proponent. <b>A MITIGATED NEGATIVE DECLARATION</b> will be prepared.
<input type="checkbox"/> I find that the proposed project <b>MAY</b> have a significant effect on the environment, and an <b>ENVIRONMENTAL IMPACT REPORT</b> is required.

<b>A PREVIOUS ENVIRONMENTAL IMPACT REPORT / NEGATIVE DECLARATION WAS PREPARED</b>
<input type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, <b>NO NEW ENVIRONMENTAL DOCUMENTATION IS REQUIRED</b> because (a) all potentially significant effects of the proposed project have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, (b) all potentially significant effects of the proposed project have been avoided or mitigated pursuant to that earlier EIR or Negative Declaration, (c) the proposed project will not result in any new significant environmental effects not identified in the earlier EIR or Negative Declaration, (d) the proposed project will not substantially increase the severity of the environmental effects identified in the earlier EIR or Negative Declaration, (e) no considerably different mitigation measures have been identified and (f) no mitigation measures found infeasible have become feasible.
<input type="checkbox"/> I find that although all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration pursuant to applicable legal standards, some changes or additions are necessary but none of the conditions described in California Code of Regulations, Section 15162 exist. An <b>ADDENDUM</b> to a previously certified EIR or Negative Declaration has been prepared and will be considered by the approving body or bodies.
<input type="checkbox"/> I find that at least one of the conditions described in California Code of Regulations, Section 15162 exist, but I further find that only minor additions or changes are necessary to make the previous EIR adequately apply to the project in the changed situation; therefore a <b>SUPPLEMENT TO THE ENVIRONMENTAL IMPACT REPORT</b> is required that need only contain the information necessary to make the previous EIR adequate for the project as revised.



I find that at least one of the following conditions described in California Code of Regulations, Section 15162, exist and a **SUBSEQUENT ENVIRONMENTAL IMPACT REPORT** is required: (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; (2) Substantial changes have occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any the following: (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration; (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR or negative declaration; (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measures or alternatives; or, (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects of the project on the environment, but the project proponents decline to adopt the mitigation measures or alternatives.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
For:

\_\_\_\_\_  
Printed Name

## II. ENVIRONMENTAL ISSUES ASSESSMENT

In accordance with CEQA (Public Resources Code Section 21000-21178.1), this Initial Study has been prepared to analyze the proposed Project and to identify any potentially significant temporary or long-term environmental impacts. In accordance with California Code of Regulations Section 15063, this Initial Study is a preliminary analysis prepared by Riverside County, the Lead Agency, to determine whether a Negative Declaration, Mitigated Negative Declaration, or an Environmental Impact Report is required for the proposed Project. The purpose of this Initial Study is to inform the decision-makers, affected agencies, and the public of potential environmental impacts associated with the implementation of the proposed project.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>AESTHETICS</b> Would the project:				
<b>1. Scenic Resources</b>				
a) Have a substantial effect upon a scenic highway corridor within which it is located?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and unique or landmark features; obstruct any prominent scenic vista or view open to the public; or result in the creation of an aesthetically offensive site open to public view?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

As previously described the Project site is located approximately 820 feet to the north of the intersection of Idaleona Road and Piedras Road (refer to Figure 1). The Project site is not located within the vicinity of any scenic highways designated by the California Department of Transportation (Caltrans) (Caltrans 2020). Additionally, Idaleona Road has not been designated as Eligible or Designated State or County Scenic Highway in the Riverside County General Plan (Riverside County 2017). Pedestrian facilities (e.g., sidewalks) are not provided along Idaleona Road. While pedestrians may walk along the shoulder of the paved roadway, views along the Idaleona Road are generally



*Foreground views along Idaleona Road include fencing and low growing vegetation. Midground and background views include trees and other shrubby vegetation as well as mountainous terrain and open sky.*

limited to drivers, who are traveling at speeds of 25 miles per hour (mph) or more. Views along Idaleona Road within the immediate vicinity of the Project site include trees and other shrubby vegetation along both sides of the paved roadway as well as a 4-foot tall barbed wire fencing along the northern side of

the road. Background views include rolling hills and mountainous topography. The Project site may be visible for short periods along Idaleona Road; however, due to existing topography and vegetation along the road, views of the Project site are largely obscured or completely blocked.

**Source(s):** Caltrans Scenic Highway System Lists; Riverside County General Plan Circulation Element Figure C-8, *Scenic Highways*

Findings of Fact:

a) **No Impact.** As previously described, there are no scenic highways located near the Project site (Caltrans 2020). The nearest locally designated scenic corridor is located on Cajalco Road, approximately 2.5 miles north of the Project site (Riverside County 2017). Therefore, there would be no impact associated with the implementation of the proposed Project.

b, c) **Less Than Significant.** The proposed Project would remove four existing California juniper trees at the Project site; however, the remaining trees within and surrounding the Project site, would be preserved in place, including the scrub oaks and California juniper trees that make up the patches of woodland and forest vegetation community to the west and to the south (refer to Figure 4). Additionally, the proposed Project would relocate existing small to medium sized boulders on the Project site but would not damage any scenic resources including rock outcroppings and unique or landmark features within the Park. Construction equipment would be visible from areas adjacent to the Project site, but potential impacts to surrounding views would be short-term and temporary, lasting for a period of 2- to 3-weeks. Following the completion of construction, the proposed day use parking and staging area would include rustic low-profile features (e.g., split rail fencing, 6-inch by 6-inch wooden hitching posts, relocated boulders, etc.). The unpaved areas within the Project site would be characterized by native soil and stabilizers as well as decomposed granite that would be generally compatible with the existing rural nature of the Park. As with the main park entrance, vehicles may be visible in the proposed day use parking and staging area, particularly in areas that are located immediately adjacent or at some higher elevations within the Park. However, due to the existing vegetation, rolling hills, and mountainous topography the views of the vehicles at the Project site would be limited throughout the entire 325-acre Park. Hikers, runners, mountain bikers, and equestrians traveling along Trail 12 to the west (refer to Figure 3) would descend to an elevation of 1,985 feet above mean sea level within less than 0.25 miles, after which the proposed day use parking and staging area would no longer be visible. Trail 1 rises in elevation to the north (refer to Figure 3); however, direct views of the proposed day use parking and staging area would be blocked by topographical features that reach elevations of over 2,050 feet above mean sea level. Closer to the Project site the western and southern boundary of the Project site would be bordered by scrub oaks and California juniper trees that would obscure views of parked vehicles. Therefore, the proposed Project would not degrade the existing visual character of the Park and impacts to scenic resources would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>2. Mt. Palomar Observatory</b>				
a) Interfere with the nighttime use of the Mt. Palomar Observatory, as protected through Riverside County Ordinance No. 655?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** County of Riverside Transportation and Land Management Agency GIS Data Downloads; County Ordinance Number 655

Findings of Fact:

a) **No Impact.** The Project site is located approximately 42 miles northwest of the Mt. Palomar Observatory. All construction activities at the Project site would take place during the daylight hours between 6:00 AM and 7:00 PM, and therefore, would not require nighttime lighting. Further, the proposed Project would not include permanent lighting since the Park closes at sunset every day. Therefore, the proposed Project would neither directly nor indirectly interfere with the nighttime use of the Mt. Palomar Observatory and there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>3. Other Lighting Issues</b>				
a) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Expose residential property to unacceptable light levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** County Ordinance Number 847

Findings of Fact:

a, b) **No Impact.** As previously described, all construction activities at the Project site would take place during the daylight hours between 6:00 AM and 7:00 PM, and therefore, would not require nighttime lighting. Further, the proposed Project would not include permanent lighting since the Park closes at sunset every day. Therefore, there would be no impact associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>AGRICULTURE &amp; FOREST RESOURCES</b> Would the project:				
<b>4. Agriculture</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing agricultural zoning, agricultural use or with land subject to a Williamson Act contract or land within a Riverside County Agricultural Preserve?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause development of non-agricultural uses within 300 feet of agriculturally zoned property (Ordinance No. 625 "Right-to-Farm")?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The Project site is located within the Lake Mathews / Woodcrest Area Plan and is designated as Open Space-Conservation Habitat (OS-C H) (Riverside County 2019a). The vegetation on the Project site consists of grassland as well as woodland and forest vegetation communities (Amec Foster Wheeler 2018b; refer to Figure 4). No current or historical agricultural and ranching operations are known to have occurred within the Project site (Amec Foster Wheeler 2018a).

**Source(s):** Riverside County General Plan Figure OS-2, *Agricultural Resources*

**Findings of Fact:**

- a) **No Impact.** The California Department of Conservation’s Farmland Mapping and Monitoring Program identifies categories of agricultural resources that are significant and require special consideration. According to the Farmland Map, the Project site is not located in an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (as defined by Government Code Section 51201[c] and 56064) or Agricultural Land (as defined by Government Code Section 56016) (California Department of Conservation 2016). Further, none of the proposed Project elements would convert existing farmland to non-agricultural use. Therefore, there would be no impact to farmland associated with the implementation of the proposed Project.
- b) **No Impact.** The Project site is neither zoned for agricultural uses nor under a Williamson Act Contract. Therefore, the proposed Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract and there would be no impact.
- c) **No Impact.** The Project site is not located within 300 feet of any property zoned for agricultural uses. The closest agriculturally zoned area is located approximately 4,400 feet (0.80 miles) to the southwest of the Project site near the Gavilan Hills Ranch Market. Therefore, there would be no impact associated with the implementation of the proposed Project.

d) **No Impact.** The proposed Project does not involve other changes to the existing environment which, due to their location or nature, would result in conversion of farmland, to non-agricultural use. Therefore, there would be no impact associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>5. Forest</b>				
a) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Govt. Code Section 51104[g])?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan Figure OS-3a, *Forestry Resources Western Riverside County Parks, Forests, and Recreation Areas*

Findings of Fact:

a-c) **No Impact.** As previously described, the Project site is located within the Lake Mathews / Woodcrest Area Plan and is designated as Open Space-Conservation Habitat (OS-C H) (Riverside County 2019a). Neither the Project site nor the surrounding vicinity is zoned as forest land or timberland. The implementation of the proposed Project would require removal of four California juniper trees; however, the Project site is not within a forested area. Therefore, the proposed Project would not conflict with existing zoning or otherwise result in the conversion of forest land to non-forest use.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>AIR QUALITY</b> Would the project:				
<b>6. Air Quality Impacts</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
attainment under an applicable federal or state ambient air quality standard?				
c) Expose sensitive receptors, which are located within one (1) mile of the project site, to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The Project site is located within the South Coast Air Basin (Basin), which is governed by the SCAQMD. Riverside County is currently in *nonattainment* for ozone (O<sub>3</sub>), both 1-hour and 8-hour, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particulate matter equal to or less than ten microns in diameter (PM<sub>10</sub>), and 2.5 microns in diameter (PM<sub>2.5</sub>) under the National Ambient Air Quality Standards (NAAQS) (U.S. Environmental Protection Agency [USEPA] 2019). Additionally, the Basin is in *nonattainment* for O<sub>3</sub>, PM<sub>2.5</sub>, and PM<sub>10</sub> under the California Ambient Air Quality Standards (CAAQS) (California Air Resources Board [CARB] 2018a). The SCAQMD has established significance thresholds for construction emissions and operational emissions for six categories of pollutants, including nitrous oxides (NO<sub>x</sub>), volatile organic compounds, (VOC), PM<sub>10</sub>, and PM<sub>2.5</sub>, sulfur oxides (SO<sub>x</sub>), CO, and lead (Pb) (see Table 3). These thresholds are based on the potential adverse short-term health effects of each pollutant.

**Table 3. Air Quality Significance Thresholds**

Pollutant	Pounds per Day
Carbon Monoxide (CO)	550
Nitrogen Oxides (NO <sub>x</sub> )	100
Respirable Particulate Matter (PM <sub>10</sub> )	150
Fine Particulate Matter (PM <sub>2.5</sub> )	55
Sulfur Oxides (SO <sub>x</sub> )	150
Lead (Pb)	3
Reactive Organic Gases (ROGs)	75

Sources: SCAQMD 2019.

The SCAQMD and the Southern California Association of Governments (SCAG) are responsible for formulating and implementing the Air Quality Management Plan (AQMP) for the Basin. A development or land use project is considered to be consistent with the AQMP if it furthers one or more policies or/and does not obstruct other policies. The SCAQMD's CEQA Air Quality Handbook (1993) identifies two key indicators of consistency:

- Whether the development or land use project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations or delay timely attainment of NAAQS or the interim emission reductions specified in the AQMP, except as provided for CO in Section 9.4 for relocating CO hot spots.
- Whether or not the development or land use project would exceed the assumptions in the AQMP in the year of build-out.

## Construction

Construction emissions were estimated for the proposed Project using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 (see Appendix D). The CalEEMod analysis conservatively assumed that construction would begin in July 2020, since air quality in Southern California tends to be worse during the Summer, when NO<sub>x</sub> more readily reacts with other chemicals and hydrocarbons in the sunlight to form O<sub>3</sub>. Construction activities would last for a total of 10 weeks, including mobilization, grading, concrete flatwork, fencing, and installation of site furnishings and signage. Table 4 presents the estimated maximum unmitigated daily construction emissions associated with the proposed Project, which includes emissions from on-site sources (i.e., construction equipment) and off-site sources (i.e., haul truck trips, concrete truck trips, and construction worker vehicles). Daily construction emissions would not exceed the SCAQMD thresholds for VOC, NO<sub>x</sub>, CO, SO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> (see Table 4).

**Table 4. Estimated Maximum Daily Construction Emissions (pounds per day)**

Peak Daily Total	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	Fugitive Dust	
					PM <sub>10</sub>	PM <sub>2.5</sub>
Summer 2020	3.88	18.64	8.45	0.02	12.69	2.47
SCAQMD Threshold	75	100	550	150	150	55
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Note: No mitigation measures were applied as estimated daily maximum construction emission are below SCAQMD thresholds.

Source: CalEEMod Version 2016.3.2; see Appendix D.

## Operation

Operation of the proposed Project would be limited to visitor trips to and from the proposed day use parking and staging area as well as periodic vehicle trips for maintenance. Visitor trips to the proposed day use parking and staging area were estimated in CalEEMod using the ITE trip generation rates for a 325-acre public park (see Appendix D). Therefore, Table 5 conservatively represents the total estimated annual operational emissions that would result from visitors traveling to and from Park. However, the proposed day use parking and staging area would provide parking for visitors that are already accessing the Park. Therefore, the net increase in operational emissions over the course of a year would be negligible. Nevertheless, even with this conservative assumption, total operational emissions would remain well below the SCAQMD thresholds and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

**Table 5. Estimated Daily Maximum Operational Emissions (pounds per day)**

Peak Daily Total	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	Fugitive Dust	
					PM <sub>10</sub>	PM <sub>2.5</sub>
Area	0.035	<0.00	0.008	0.000	<0.000	<0.000
Energy	0.000	0.000	0.000	0.000	0.000	0.000
Mobile	0.126	0.901	1.501	0.006	20.12	2.075
Overall	0.161	0.901	1.510	0.006	20.12	2.075
SCAQMD Threshold	75	100	550	150	150	55
<b>Significant?</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Note: No mitigation measures were applied as estimated daily maximum construction emission are below SCAQMD thresholds.

Source: CalEEMod Version 2016.3.2; see Appendix D.

**Source(s):** SCAQMD CEQA Air Quality Handbook



### Findings of Fact:

a) **No Impact.** As shown in Table 4, construction of the proposed Project would not substantially increase any sources of criteria pollutant emissions and construction emissions would remain well below the SCAQMD thresholds. As such, the minor, short-term construction emissions associated with the proposed Project would not conflict with or obstruct implementation of the AQMP. Implementation of the proposed Project would neither introduce new stationary sources of emissions nor substantially change existing mobile operations at the Park. The AQMP is based on emission projections, which assume land use composition and intensity from local general plan land use elements. Because the proposed Project does not include any change in land use or activities at the Project site and would not result in an increase in overall demand for the Park, the proposed Project would not induce growth (directly or indirectly) that might be inconsistent with the Riverside County General Plan or AQMP. Therefore, there would be no impact associated with the implementation of the proposed Project.

b) **Less Than Significant.** Due to the limited scope of the proposed construction activities – in terms of equipment, duration of construction, truck trips, and number of construction worker vehicle trips, etc. – short-term, temporary construction emissions would not violate air quality standards or contribute substantially to an existing air quality violation (refer to Table 4). As such, the proposed Project would result in less than significant impacts to air quality during construction. As the net increase in operational emissions would be negligible, the long-term operational impacts to air quality associated with the proposed Project would also be less than significant.

c) **Less Than Significant.** The nearest sensitive receptor to the Project site is the single-family rural residence located south of Idaleona Road (approximately 0.25 miles). The Park itself could also be considered a sensitive receptor; however, trail users within the 325-acre Park visit intermittently and would generally disperse quickly from the proposed day use parking and staging area.

Construction activities associated with the proposed Project would be short-term (i.e., between 2 to 3 months) and temporary. Due to the limited area of disturbance (i.e., 1.8 acres) and total earthwork (i.e., 500 cy), construction emissions would remain well below the SCAQMND thresholds (refer Table 4). Operational emissions associated with the proposed Project would be similar to existing conditions and would also remain well below SCAQMD thresholds (refer Table 5). Therefore, impacts to sensitive receptors would be less than significant.

d) **Less Than Significant.** Odors produced during the 2- to 3-month construction period would be localized and attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. Such odors would be temporary, consistent with standard construction activities, and would not affect substantial numbers of people in the vicinity of the Project site – particularly given that the construction areas would be located approximately 0.25 miles from the nearest sensitive receptor with intervening vegetation and roadways. Therefore, impacts associated with odors during construction would be considered less than significant. Operation odors associated with the proposed day use parking and staging area would be limited to vehicle emissions from truck and horse trailer combinations and passenger vehicles. These odors would be negligible, particularly given the intervening roadways and impacts would be less than significant.

Mitigation: The proposed Project would not result in significant impacts to air quality at the regional or local levels. However, to assure compliance with SCAQMD rules, the following Best Management Practices (BMPs) would be implemented as a part of the proposed Project:

**BMP AQ-1:** During clearing, grading, earth moving, or excavation operations, excessive fugitive dust emissions shall be controlled by regular watering or other dust preventive measures using the following procedures, as specified in SCAQMD Rule 403:

- All material excavated or graded shall be sufficiently watered to prevent excessive amounts of dust.
- Watering shall occur at least twice daily with complete coverage, preferable in the late morning and after work is done for the day.
- All material transported on- or off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust.
- The area disturbed by cleaning, grading, or earth moving operations shall be minimized so as to prevent excessive amounts of dust.

**BMP AQ-2:** Emissions from construction equipment vehicles shall be controlled by maintaining equipment engines in good operating condition and in proper tune per manufacturer’s specifications.

Monitoring: Compliance with these BMPs would be subject to periodic site inspections by the Riverside County Planning Department.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>BIOLOGICAL RESOURCES</b> Would the project:				
<b>7. Wildlife &amp; Vegetation</b>				
a) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state conservation plan?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect, either directly or through habitat modifications, on any endangered, or threatened species, as listed in Title 14 of the California Code of Regulations (Sections 670.2 or 670.5) or in Title 50, Code of Federal Regulations (Sections 17.11 or 17.12)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
California Department of Fish and Game or U. S. Fish and Wildlife Service?				
f) Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

An MSHCP Consistency Analysis was prepared for the proposed Project by Amec Foster Wheeler (Amec Foster Wheeler 2018b; see Appendix A). This analysis included a literature review and reconnaissance-level field survey, which was conducted on September 26, 2017, covering a 17-acre biological survey area (BSA) (refer to Figure 4). The entire Park, including the Project site, is a part of the Western Riverside MSHCP Conservation Area and occurs within the Public-Quasi-Public (PQP) lands. Section 4 of the MSHCP, states that the “conservation area incorporates maximum use of existing PQP lands to achieve conservation objectives” and specifically names the Park as land “that will contribute to the conservation of covered species.”

The BSA is located within MSHCP survey areas for several species including:

- Little mousetail (*Myosurus minimus* ssp. *apus*);
- Many-stemmed dudleya (*Dudleya multicaulis*);
- Munz's onion (*Allium munzii*);
- Round-leaved filaree (*California [Erodium] macrophyllum*);
- San Diego ambrosia (*Ambrosia pumila*);
- Smooth tarplant (*Centromadia pungens* ssp. *laevis*);
- Thread-leaved brodiaea (*Brodiaea filifolia*); and
- Burrowing owl (*Athene cunicularia*).

The entire BSA was surveyed for these special status plants and animals as well as any other special status species identified during the literature review. Representative photographs and a list of all plants and animals detected (e.g., through direct observation, vocalizations, presence of scat, tracks, and/or bones) within the BSA are included in Appendix A.

### *Critical Habitat*

The MSHCP Consistency Analysis found that no federally designated critical habitat occurs within the Project site or within the Park (Amec Foster Wheeler 2018b; USFWS 2017).

### *Vegetation*

Four vegetation communities were mapped within the BSA, including grasslands, woodland and forest, chaparral, and riparian scrub. Representative plant species observed in the BSA included, but were not limited to California juniper, scrub oak, chamise, small-flowered fiddleneck, Russian thistle, California buckwheat, red brome, mule fat, and red willow. Scrub oaks are not protected by the Riverside County Oak Tree Management Guidelines (Riverside County 1999) and no other oak species were detected in the BSA.

The Project site is primarily characterized by the grassland vegetation community, which consists of annual plant species dominated by several grasses including slender wild oat, red brome, and soft chess (Amec Foster Wheeler 2018b; refer to Figure 4). Small patches of woodland and forest, characterized by scrub oak and California juniper, occur at the western boundary and along the southern boundary of the Project site (Amec Foster Wheeler 2018b; refer to Figure 4). A small patch of chaparral, a shrub-dominated vegetation community that is composed relatively largely of evergreen species, is located at the southwestern corner of the Project site (Amec Foster Wheeler 2018b; refer to Figure 4).

### *Special Status Biological Resources*

The review of the California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants, and other sources identified a total of 83 special status biological resources known to occur within 5 miles of the Project site. These include 26 plants, 4 vegetation communities, 2 invertebrates, 1 amphibian, 8 reptiles, 12 birds, and 4 mammals (Amec Foster Wheeler 2018b). Amec Foster Wheeler conducted a reconnaissance-level field survey to inventory plants and animals within the BSA and to determine overall the habitat suitability for special status species. Of the special status species identified in the literature review, 11 plants, 1 invertebrate, 3 reptiles, 3 birds, and 2 mammals are considered to have a high potential to occur within the BSA (see Tables 6 and 7). Additionally, 1 amphibian, 4 reptiles, 4 birds, and 1 mammal are considered to have a moderate to occur within the BSA (see Tables 6 and 7).

**Table 6. Special Status Plant Species with Moderate to High Potential for Occurrence in the BSA**

Species	Scientific Name	Federal Status	State Status	CRPR	Other Special Status	Habitat
Little mouseltail	<i>Myosurus minimus</i> ssp. <i>apus</i>	-	-	3.1	S2	<b>High Potential.</b> Vernal pools, valley and foothill grassland. Alkaline soils. 65 – 2,100 feet.
Long-spined spineflower	<i>Chorizanthe polygonoides</i> var. <i>longispina</i>	-	-	1B.2	S3	<b>High Potential.</b> Chaparral, coastal scrub, meadows and seeps, valley and foothill grassland, vernal pools. Gabbroic clay. 95 – 5,055 feet.
Munz's onion	<i>Allium munzii</i>	FE	ST	1B.1	S1	<b>High Potential.</b> Heavy clay soils; grows in grasslands and openings within shrublands or woodlands. 1,230 – 3,415 feet.
Palmer's grapplinghook	<i>Harpagonella palmeri</i>	-	-	4.2	S3	<b>High Potential.</b> Chaparral, coastal scrub, valley and foothill grassland. Clay soils. 65 – 3,135 feet.
Paniculate tarplant*	<i>Deinandra paniculata</i>	-	-	4.2	S4	<b>Occurs within BSA.</b> Coastal scrub, valley and foothill grassland, vernal pools. 80 – 3,085 feet.
Parry's spineflower	<i>Chorizanthe parryi</i> var. <i>parryi</i>	-	-	1B.1	S2	<b>High Potential.</b> Sandy or rocky openings in chaparral, coastal sage scrub, cismontane woodland, valley and foothill grassland. 900 – 4,005 feet.
Payson's jewlflower	<i>Caulanthus simulans</i>	-	-	4.2	S4	<b>High Potential.</b> Sandy, granitic areas in chaparral and coastal scrub. 295 – 7,220 feet.
Peninsular spineflower	<i>Chorizanthe leptotheca</i>	-	-	4.2	S3	<b>High Potential.</b> Alluvial fans, granitic areas in chaparral, coastal scrub, and lower montane coniferous forest. 980 – 6,235 feet.

Species	Scientific Name	Federal Status	State Status	CRPR	Other Special Status	Habitat
Small-flowered microseris	<i>Microseris douglasii</i> ssp. <i>platycarpha</i>	-	-	4.2	S4	<b>High Potential.</b> Cismontane woodland, coastal scrub, valley and foothill grassland, vernal pools. 45 – 3,515 feet.
Small-flowered morning-glory	<i>Convolvulus simulans</i>	-	-	4.2	S4	<b>High Potential.</b> Chaparral (openings), coastal scrub, valley and foothill grassland. 95 – 2,430 feet.
Smooth tarplant	<i>Centromadia pungens</i> ssp. <i>laevis</i>	-	-	1B.1	S2	<b>High Potential.</b> Annual herb found in alkaline areas within chenopod scrub, meadows, playas, riparian woodland, valley and foothill grassland below 3,000 feet.
Woven-spored lichen*	<i>Texosporium sanctijacobi</i>	-	-	3	S1	<b>High Potential.</b> Openings in chaparral on soil, small mammal pellets, dead twigs, and <i>Selaginella</i> spp. 950 – 2,170 feet.
<b>Federal Status</b> FE: Federally Endangered  <b>State Status</b> ST: State Threatened  <b>CDFW Status</b> S1: Critically Imperiled S2: Imperiled S3: Vulnerable S4: Apparently Secure		<b>California Native Plant Society</b> CRPR: California Rare Plant Rank 1B: Plants rare, threatened, or endangered in California and elsewhere 3: Plants about which more information is needed (Review List) 4: Plants of limited distribution (Watch List) 0.1: Seriously threatened in California 0.2: Moderately threatened in California  <b>MSHCP</b> * Species not included in the Western Riverside MSHCP				

Notes: The species included have been observed within the BSA or the Park or otherwise have a high potential for occurrence based on existing habitat within the BSA. For a complete list of specialist status species – including species that have been recorded in the vicinity but have a low potential to occur within the BSA – see Appendix A. Source: Amec Foster Wheeler 2018b.

**Table 7. Special Status Animal Species with Moderate to High Potential for Occurrence in the BSA**

Species	Scientific Name	Federal Status	State Status	Other Special Status	Habitat
<b>Invertebrates</b>					
Quino checkerspot butterfly	<i>Euphydryas editha quino</i>	FE	-	S1S2	<b>High Potential.</b> Occurs in sunny openings within chaparral and coastal sage shrublands in parts of Riverside and San Diego counties. Also occurs in hills and mesas near the coast. Requires high densities of food plants <i>Plantago erecta</i> , <i>P. insularis</i> , and <i>Orthocarpus purpurescens</i> .
<b>Amphibians</b>					
Western spadefoot	<i>Spea hammondi</i>	-	-	SSC, S3	<b>Moderate Potential.</b> Occurs primarily in grassland habitats but can be found in valley-foothill hardwood woodlands. Vernal pools are essential for breeding and egg laying.
<b>Reptiles</b>					
(Belding's) orange-throated whiptail	<i>Aspidoscelis hyperythra</i>	-	-	WL, S2S3	<b>High Potential.</b> Inhabits low-elevation coastal scrub, chaparral, and valley-foothill hardwood habitats. Prefers washes and other sandy areas with patches of brush and rocks.
California (coastal) glossy snake*	<i>Arizona elegans occidentalis</i>	-	-	SSC, S2	<b>Moderate Potential.</b> Reported from a range of scrub and grassland habitats, often with loose or sandy soils.
coast patch-nosed snake*	<i>Salvadora hexalepis virgultea</i>			SSC, S2S3	<b>Moderate Potential.</b> Brushy or shrubby vegetation in coastal Southern California. Requires small mammal burrows for refuge and overwintering sites.
Coast (San Diego) horned lizard	<i>Phrynosoma blainvillii</i>	-	-	SSC, S3S4	<b>High Potential.</b> Occurs in many scrub and woodland habitats, grasslands within loose soils. Prefers open sandy areas, washes, and floodplains.

Species	Scientific Name	Federal Status	State Status	Other Special Status	Habitat
					Requires open areas for sunning, bushes for cover, and ants or other prey items.
Coastal western whiptail	<i>Aspidoscelis tigris stejnegeri</i>	-	-	SSC, S3	<b>Moderate Potential.</b> Occurs in a wide variety of habitats including coastal sage scrub, sparse grassland, and riparian woodland; coastal and inland valleys and foothills.
(Northern) red-diamond rattlesnake	<i>Crotalus ruber</i>	-	-	SSC, S3	<b>High Potential.</b> Occurs in chaparral, woodland, grassland, and desert areas, particularly in rocky areas and areas with dense vegetation. Requires rodent burrows, cracks in rocks, or other surface cover objects.
San Bernardino ringneck Snake*	<i>Diadophis punctatus modestus</i>	-	-	SSC, S2?	<b>Moderate Potential.</b> Most common in open, relatively rocky areas. Often in somewhat moist microhabitats near intermittent streams. Avoids moving through open or barren areas by restricting movements to areas of surface litter or herbaceous vegetation.
<b>Birds</b>					
Bell's (sage) sparrow	<i>Artemisiospiza belli</i>	-	-	MBTA, BBC, FGC, WL, S3	<b>Moderate Potential.</b> Nests in chaparral, usually dominated by fairly dense stands of chamise. Found in coastal sage scrub in south of range.
Coastal California gnatcatcher	<i>Polioptila californica californica</i>	FT	-	MBTA, FGC, SSC, S2,	<b>Moderate Potential.</b> Inhabits sage scrub in low-lying foothills and valleys, and sparse chaparral habitats.
Cooper's hawk	<i>Accipiter cooperi</i>	-	-	MBTA, FGC, WL, S4	<b>Occurs within BSA.</b> Occurs in woodlands, chiefly of open, interrupted, or marginal type. Nest mainly in riparian growths of deciduous trees as well as in canyon bottoms along river flood plains.
Loggerhead shrike	<i>Lanius ludovicianus</i>	-	-	MBTA, BBC, FGC, SSC, S4	<b>Moderate Potential.</b> Found in open habitats with widely spaced vegetation.



Species	Scientific Name	Federal Status	State Status	Other Special Status	Habitat
Long-eared owl*	<i>Asio otus</i>	-	-	MBTA, BCC, FGC, SSC, S3	<b>High Potential.</b> Occurs in riparian bottomlands grown to tall willows and cottonwoods as well as belts of live oak paralleling stream courses. Requires adjacent open land, with mice for prey and the presence of old nests of crows, hawks, or magpies for breeding.
Southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	-	-	MBTA, FGC, WL, S3	<b>Moderate Potential.</b> Steep, rocky coastal sage scrub and open chaparral habitats, particularly scrubby areas mixed with grasslands. From Santa Barbara County to northwestern Baja California.
White-tailed kite	<i>Elanus leucurus</i>	-	-	MBTA, FP, FGC, S3S4	<b>High Potential.</b> Occurs in rolling foothills and valley margins with scattered oaks and river bottomlands or marshes next to deciduous woodland. Prefers open grasslands, meadows, or marshes for foraging close to trees for nesting and perching.
<b>Mammals</b>					
Northwestern San Diego pocket mouse	<i>Chaetodipus fallax fallax</i>	-	-	SSC, S3S4	<b>Moderate Potential.</b> Found in sandy herbaceous areas, usually associated with rocks or coarse gravel in coastal scrub, chaparral, grasslands, and sagebrush.
Stephens' kangaroo rat	<i>Dipodomys stephensi</i>	FE	ST	S3S4	<b>High Potential.</b> Primarily occurs in annual and perennial grasslands, but also occurs in coastal scrub and sagebrush with sparse canopy cover. Prefers buckwheat, chamise, brome grass, and filaree and will burrow into firm soil.
San Diego desert woodrat	<i>Neotoma lepida intermedia</i>	-	-	SSC, S3S4	<b>High Potential.</b> The subspecies "intermedia" is an animal that occurs within the coastal slope. Coastal sage

Species	Scientific Name	Federal Status	State Status	Other Special Status	Habitat
					scrub and chaparral with rock outcrops, boulders, cactus patches, or dense undergrowth. This subspecies is generally now considered a full species, Bryant's woodrat ( <i>Neotoma bryanti</i> ).
<p><b>Federal Status</b> FE: Federally Endangered</p> <p><b>State Status</b> ST: State Threatened</p> <p><b>CDFW Status</b> S1: Critically Imperiled S2: Imperiled S3: Vulnerable S4: Apparently Secure</p>		<p><b>Other Federal Designations</b> MBTA: Bird Species Protected under the Migratory Bird Treaty Act BCC: Bird of Conservation Concern</p> <p><b>Other CDFW Designations</b> FP: CDFW Fully Protected Species FGC: Bird Species Protected by the California Fish and Game Code SSC: CDFW Species of Special Concern</p> <p><b>MSHCP</b> * Species not included in the Western Riverside MSHCP</p>			

Notes: The species included have been observed within the BSA or the Park or otherwise have a high potential for occurrence based on existing habitat within the BSA. For a complete list of specialist status species – including species with moderate, low, and no potential to occur within the BSA – see Appendix A.  
Source: Amec Foster Wheeler 2018b

## *Jurisdictional Waters*

The Jurisdictional Delineation prepared for the proposed Project included a review of the National Wetlands Inventory (NWI) Mapper to identify potential wetland features within the BSA (Wood 2020). The BSA crosses one NWI feature categorized as riverine, intermittent streambed, seasonally flooded wetlands (R4SBC) (Wood 2020; USFWS 2019).

A field survey was conducted on September 18, 2019 to determine if the flows associated with potential drainage wetland feature met the minimum criteria to be considered under the jurisdiction of U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and CDFW. Visual observations of vegetation types, changes in hydrology and changes in soils texture were used to locate the areas to be evaluated. To determine jurisdictional boundaries, the surveyor walked the length of the drainage and recorded the centerline with a Trimble GeoXH global positioning system. The width of the drainage was determined by the OHWM and bankfull width measurements at locations where transitions were apparent. Other data recorded included bank height and morphology, substrate type, and all vegetation within the streambed and riparian vegetation adjacent to the streambed. Soils pits were dug in areas that contained hydrophytic vegetation and wetland hydrology to determine if hydric soils were present. Areas that lacked evidence of hydrophytic vegetation, lacked evidence of wetland hydrology, and had no recent disturbance, did not require a soil pit given that the other wetland indicators were not present (Wood 2020).

The BSA contains the headwaters of a downstream drainage feature, approximately 300 feet to the south of the Project site (refer to Figure 4). However, natural runoff in this area sheet flows across Piedras Road with no evidence of an OHWM and/or definable bed and bank feature. Two partially buried culverts were observed under the access road within the survey area (refer to Figure 4). These culverts have not recently conveyed any flows and showed no sign of OHWM. The sheet flow within the BSA is conveyed in an area that has scattered red willow (*Salix laevigata*) but does not have sufficient cover to be considered a riparian habitat. A soil pit was attempted, but the soil was extremely hard and a pit of approximately 3 to 4 inches was completed. There was no evidence of hydric soils or any noticeable wetland hydrology indicators. There was also no change in soil texture or vegetation coverage, often associated with a drainage feature with no definable bed and bank feature. Therefore, no areas within the BSA – including the Project site – meet the minimum criteria to be under the jurisdiction of USACE, RWQCB, or CDFW. Further, no areas within the BSA – including the Project site – meet the minimum criteria to be considered Riparian/Riverine under the Western Riverside County MSHCP (Wood 2020).

**Source(s):** Harford Springs Park Day Use Staging Area Project Environmental Constraints & Western Riverside County Multiple Species Habitat Conservation Plan Consistency Analysis; Harford Springs Park Day Use Staging Area Project Delineation of Jurisdictional Waters

### Findings of Fact:

a) **Less Than Significant with Mitigation Incorporated.** Section 7 of the MSHCP discusses covered activities and allowable uses in the Conservation Area. As described in the MSHCP Consistency Analysis, the proposed Project appears to qualify as a “conditionally compatible use” under Section 7.4.2 of the MSHCP. Although the main goal of the Conservation Area is to protect sensitive biological resources, another primary objective is to provide recreational and educational opportunities within the Conservation Area, while providing adequate protection for special status species and their habitats. Public access is a very important part of the MSHCP because it gives the public an opportunity to

experience and appreciate the natural environment that is being protected. The primary public access component within the Conservation Area is trails; however, three other types of public access facilities can also be located within the Conservation Area: trailheads, interpretive centers, and maintenance facilities (Amec Foster Wheeler 2018b).

Trailheads provide trail access points and recreational amenities for day use activities that can be selectively specialized to accommodate hikers, runner, mountain biker, and/or equestrians. The MSHCP includes the assumption that 14 trailheads will be constructed within the Conservation Area, each being approximately 5 acres. It is unclear from the MSHCP whether these facilities are conceptual or if they have already been identified and sited. Vegetation communities identified by the MSHCP as anticipated to be impacted included agricultural land, chaparral, coastal sage scrub, and grassland. Two of those communities, chaparral and grassland, occur within the BSA and one of those communities, grassland, occurs within the Project site (Amec Foster Wheeler 2018b). With the implementation of Mitigation Measure BR-1, which would require compliance with the construction guidelines provided in Section 7.5.3 of the MSHCP, the impacts would be less than significant with mitigation incorporated.

In the event that the proposed Project is not considered a covered “conditionally compatible use” by the RCA as described in Section 7.4.2 of the MSHCP, it could still be approved under the process described in Section 7.2.4 of the MSHCP: “Future Facilities Within PQP Lands.” While this section specifically mentions facilities for water, sewer, electrical, gas and solid waste, it identifies a process of equivalent conservation provided through individual mitigation. The process would require an equivalency analysis which would address the following categories:

- Effects on habitats;
- Effects on covered species;
- Effects on core areas;
- Effects on linkages and constrained linkages;
- Effects on MSHCP Conservation Area configuration and management; and
- Effects on ecotones (defined as areas of adjoining vegetation communities, generally characterized by greater biological diversity) and other conditions affecting species diversity (such as invasion by exotics).

The equivalency analysis would be provided for review and concurrence by the RCA and would compare the effects/benefits of the proposed Project including specific mitigation and compensation for lost conservation values, with the conditions prior to facility implementation. The analysis would need to consider specific design features of the proposed Project, including consideration of MSHCP siting and design guidelines as well as MSHCP BMPs. In this case, impacts to habitats within the existing PQP lands would be compensated by purchase and dedication into the MSHCP Conservation Area of land elsewhere consistent with the requirement of Mitigation Measure BR-1. As such, impacts associated with the proposed Project would be less than significant with mitigation incorporated.

The Project site is located along the Urban/Wildlands Interface. Therefore, potential indirect edge effects, which include noise, trash/debris, urban and stormwater runoff, toxic materials, exotic plant and animal infestations, dust, trampling and unauthorized recreational use, and their relation to the functions

and values of the areas to be conserved, must be minimized or eliminated. Compliance with Mitigation Measure BR-2 would address these indirect effects and would reduce impacts to less than significant with mitigation incorporated.

b, c) **Less Than Significant with Mitigation Incorporated.** As previously described Amec Foster Wheeler conducted a reconnaissance-level field survey to inventory flora and fauna within the BSA and to determine overall habitat suitability for special status plants and animals. Of the special status species identified in the literature review, 11 plants, 1 invertebrate, 3 reptiles, 3 birds, and 2 mammals are considered to have a high probability of being present in the BSA (see Tables 6 and 7). Additionally, 1 amphibian, 4 reptiles, 4 birds, and 1 mammal are considered to have a moderate probability of being present in the BSA (refer to Tables 6 and 7).

#### *Federally and State Listed Species*

The literature review and reconnaissance-level field survey indicate that the following federally and/or state listed species have the potential to occur within the Project site or the immediate vicinity:

**Quino checkerspot butterfly** – The Quino checkerspot butterfly is a federally endangered species that occurs in sunny openings within chaparral and coastal sage shrublands. Quino checkerspot butterflies require high densities of food plants *Plantago erecta*, *P. insularis*, and *Orthocarpus purpureus*. This species is managed for in the Subunit 3 of the Lake Mathews / Woodcrest Area Plan: “Gavilan Hills West,” which calls for reintroduction within the Northwest Riverside County Recovery Unit and the Gavilan Hills Habitat Complex as identified in the January 2001 USFWS Draft Recovery Plan for the Quino Checkerspot Butterfly. This species is managed for at the Park under the terms of the MSHCP and has been previously recorded within the BSA (Amec Foster Wheeler 2018b).

**Coastal California Gnatcatcher** – The coastal California gnatcatcher is a federally threatened species that inhabits sage scrub in low-lying foothills and valleys, and sparse chaparral habitats. This species has been previously recorded within the Park and in the surrounding vicinity. However, the Project site does not include high quality chaparral habitat. Therefore, while coastal California gnatcatchers have a moderate potential to occur within the BSA, they are unlikely to occur within the Project site (Amec Foster Wheeler 2018b).

**Stephens’ Kangaroo Rat** – Stephens’ kangaroo rat is a federally endangered and state-listed threatened species that occur in primarily annual and perennial grasslands, but also occurs in coastal scrub and sagebrush habitats with sparse canopy cover. Specifically, this species prefers buckwheat, chamise, brome grass, and filaree. Stephens’ kangaroo rats are managed for in the Subunit 3 of the Lake Mathews / Woodcrest Area Plan: “Gavilan Hills West,” which calls for maintaining the linkage area in this area. During the reconnaissance-level field survey kangaroo rat sign was widespread in the BSA (Amec Foster Wheeler 2018b).



*Kangaroo rat burrows were observed to the east of the Project site indicating the potential presence of Stephens’ Kangaroo Rat.*

**Munz's Onion** – Munz's onion occurs in heavy clay soils in grassland vegetation communities and in openings within shrublands or woodlands. This species is managed for in the Subunit 3 of the Lake Mathews / Woodcrest Area Plan: "Gavilan Hills West," which calls for conservation of clay soils supporting Munz's onion. Additionally, this species has been previously recorded within the southwestern corner of the BSA within Bosanko clay soils. However, as described in Section 18, *Soils* the Project site is characterized by the Vista soil series, which includes moderately deep, well drained soils that formed in material weathered from decomposed granitic rocks (Amec Foster Wheeler 2018b; U.S. Department of Agriculture Natural Resources Conservation Service 2017). Therefore, Munz's onion is not likely to occur within the Project site.

#### *Other Special Status Species Identified in the MSHCP*

Protection of Narrow Endemic Plant Species is discussed in Section 6.1.3 of the MSHCP. The plan states that the existing MSHCP database does not provide the level of detail sufficient to determine the extent of presence or distribution of certain Narrow Endemic Plant Species. As such, survey areas have been established within the Criteria Area of the MSHCP for locations where appropriate habitat may be present. Habitat assessment for four of these species was required within the BSA: Munz's onion, San Diego ambrosia, slender-horned spineflower, and many-stemmed dudleya. Potential habitat was present within the BSA for all of these except slender-horned spineflower. However, only Munz's onion has a high potential for occurrence within the BSA. As previously described the Project site is characterized by the Vista soil series, which includes moderately deep, well drained soils that formed in material weathered from decomposed granitic rocks (Amec Foster Wheeler 2018b; U.S. Department of Agriculture Natural Resources Conservation Service 2017). Therefore, Munz's onion is not likely to occur within the Project site.

In addition to Narrow Endemic Plant Species, portions of the BSA are in Criteria Area Species Survey Area 1, which includes the following seven species: round-leaved filaree, smooth tarplant, thread-leaved brodiaea, Davidson's saltscale (*Atriplex serenana* var.  *davidsonii*), Parish's brittlescale (*Atriplex parishii*), Coulter's goldfields (*Lasthenia glabrata* ssp.  *coulteri*), and little mousetail. Portions of the BSA are also in the designated survey area for the burrowing owl. Potential habitat is present in the BSA for all of these species except Davidson's saltscale, Parish's brittlescale, and Coulter's goldfields. However, only smooth tarplant and little mousetail have a high potential for occurrence.

#### *Potential Impacts*

Implementation of the proposed Project would involve vegetation removal and minor grading activities throughout the 1.8-acre Project site. These activities would have the potential to directly impact special status plants (e.g., removal or trampling) and animals (e.g., mortality or injury) with moderate to high potential to occur on the Project site. All federally listed and state-listed species with potential to occur within the Project site are covered under the MSHCP. Therefore, with the implementation of Mitigation Measure BR-3 and approval of the proposed Project the RCA through the JPR review process, "take" permits granted under the MSHCP. Additionally, Stephens' kangaroo rat is covered by a separate habitat conservation plan administered by the Riverside County Habitat Conservation Agency (RCHCA) (RCHCA 1990). Under Mitigation Measure BR-4, RivCoParks shall consult with the RCA and the RCHCA and negotiate payment of the Stephens' Kangaroo Rat Habitat Conservation Plan (SKRHCP) fee. With the implementation of Mitigation Measures BR-3 and BR-4, construction-related impacts to federally and state listed species would be less than significant with mitigation measures incorporated.

The majority of other special status species with moderate to high potential to occur on the Project site are also covered in the MSHCP. Given that the proposed Project is consistent with the MSHCP, potential impacts to these species would be less than significant. Special status species with moderate to high potential to occur on the Project site that are not covered in the MSHCP include the following:

- Paniculate tarplant
- Woven-spored lichen
- California (coastal) glossy snake
- Coast patch-nosed snake
- San Bernardino ringneck snake
- Long-eared owl

Paniculate tarplant and woven-spored lichen are CRPR 4.2 (Watch List) and CRPR 3 (Review List), respectively. Potential impacts to these species would not have a substantial impact on the overall health or future growth of the population within the region. The four special status animal species not covered under the MSHCP are CDFW Species of Special Concern (SSC). Additionally, the long-eared owl is protected by the California Department of Fish and Game Code. With the implementation of Mitigation Measure BR-5 and BR-6, which require pre-construction surveys, a Worker Environmental Awareness Program (WEAP) training, and biological monitoring during vegetation removal and initial ground disturbance potential construction-related impacts to these species would be less than significant with mitigation incorporated.

The Federal Migratory Bird Treaty Act (MBTA) and Section 3503 of the California Fish and Game Code prohibit the knowing disruption of an active nest of virtually any native bird species. Construction activities associated with the proposed Project could result in the disruption of one or more active nests of regulated bird species, particularly during vegetation removal. Construction activities associated with the proposed Project may also result in indirect impacts to nesting birds due to increased construction noise levels in the immediate Project vicinity. With the implementation of Mitigation Measure BR-7, which would require nesting bird surveys and monitoring, if necessary, potential impacts to nesting birds would be avoided and impacts would be less than significant with mitigation incorporated.

Following the completion of construction activities, operation of the proposed day use parking and staging area would not result in substantial new disturbance to special status species within the vicinity. The proposed day use parking and staging area is located adjacent to Piedras Road approximately 820 feet to the north of its intersection of Idaleona Road. These roads already experience vehicle traffic and associated vehicle-generated noise. Additionally, the proposed day use parking and staging area would be integrated with the existing trail system. As such, hikers, runners, mountain bikers, and equestrians would be using existing established trails and there would be less than significant impacts on surrounding biological resources, including special status species.

d) **Less Than Significant with Mitigation Incorporated.** The BSA is located in the Lake Mathews / Woodcrest Area Plan, which is discussed in Section 3.3.7 of the MSHCP. Cores and linkages within the Lake Mathews / Woodcrest Area Plan include a small portion of Proposed Core 1, a portion of Proposed Extension of Existing Core 2, and a portion of Proposed Linkage 3. Only Proposed Linkage 3 is located within the vicinity of the BSA (see Appendix A). This proposed linkage is generally comprised of upland habitats in the Gavilan Hills, Harford Springs, and proposed North Peak Conservation Bank

under PQP and private ownership. This linkage is one of two connections between the Lake Mathews / Estelle Mountain Reserve and core areas in Alberhill.

Part of the BSA is located in Subunit 3 of the Lake Mathews / Woodcrest Area Plan: “Gavilan Hills West.” The BSA intersects three criteria cells with defined MSHCP goals (see Appendix A). Cells 2738, which is the only criteria cell located within the Project site, is located in Cell Group L. Conservation within this cell group will contribute to assembly of Proposed Linkage 3. Conservation will focus on a mosaic of habitat types including chaparral, coastal sage scrub, grassland, woodland, and forest habitat. Areas conserved within this group will be connected to chaparral, coastal sage scrub, woodland and forest habitat proposed for conservation in Cell Group I to the north, to coastal sage scrub habitat proposed for conservation in Cell 2629 to the west, and to chaparral, grassland, woodland, and forest habitat proposed for conservation in Cell Group M to the east.

The implementation of the proposed Project would have a minimal effect on Proposed Linkage 3. Construction and operation of the proposed Project would result in disturbance, but neither block the proposed linkage nor substantially interfere with the movements of any native or migratory animal species. The implementation of Mitigation Measures BR-1 and BR-2 would require RivCoParks to comply with siting and construction requirements established in the MSHCP and compensate habitat within the Conservation Area at a 1:1 ratio in the event that the proposed Project is not considered a “conditionally compatible use” by the RCA as described in Section 7.4.2 of the MSHCP. With these mitigation measures, any impacts to wildlife corridors or linkages would be less than significant with mitigation incorporated.

e, f) **No Impact.** According to the Jurisdictional Delineation prepared for Project site, there are no wetlands or riparian habitats within the Project site (Wood 2020; see Appendix B). Therefore, there would be no impact to wetlands associated with the implementation of the proposed Project.

g) **No Impact.** County Ordinance Number 559 requires a tree removal permit for living native trees on any parcel or property greater than 0.5 acre in size, located in an area above 5,000 feet in elevation and within the unincorporated area of the County (Riverside County 1985). While the proposed Project would require the removal of four trees, a permit pursuant to County Ordinance Number 559 would not be required as the Project site is located below 5,000 feet above mean sea level. Therefore, there would be no impact to protected biological resources that may conflict with local ordinances.

Mitigation: The following mitigation measures include recommendations from the MSHCP Consistency Analysis (Amec Foster Wheeler 2018b; see Appendix A). The potential adverse impacts to biological resources would be mitigated to a less than significant level through implementation of the measures described below.

**Mitigation Measure BR-1:** If the proposed Project is approved as a “conditionally compatible use” by the RCA, RivCoParks would be required to comply with the guidelines provided in the Section 7.4.2 of the MSHCP for siting and design. These guidelines address ways to avoid and minimize impacts to natural resources within the conservation area as a result of the placement and design of such facilities. RivCoParks would also be required to comply with the construction guidelines provided in Section 7.5.3 of the MSHCP for facilities within the criteria area and PQP lands.

In the event that the proposed Project is not considered a “conditionally compatible use” by the RCA and is instead pursued as a “future facility within PQP lands,” impacts to habitats within the Park would



be compensated by purchase and dedication into the MSHCP Conservation Area of land at not less than a ratio of 1:1.

**Mitigation Measure BR-2:** The proposed Project would be required to follow the MSHCP guidelines intended to address indirect effects associated with locating development in proximity to the Conservation Area, or within the Conservation Area:

1. Drainage: Proposed developments in proximity to the MSHCP Conservation Area shall incorporate measures, including measures required through the National Pollutant Discharge Elimination System (NPDES), to ensure that the quantity and quality of runoff discharged to the MSHCP Conservation Area is not altered in an adverse way when compared with existing conditions. In particular, measures shall be put in place to avoid discharge of untreated surface runoff from developed and paved areas into the MSHCP Conservation Area. Stormwater systems shall be designed to prevent the release of toxins, chemicals, petroleum products, exotic plant materials or other elements that might degrade or harm biological resources or ecosystem processes within the MSHCP Conservation Area. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. Regular maintenance shall occur to ensure effective operations of runoff control systems.
2. Toxics: Land uses proposed in proximity to the MSHCP Conservation Area that use chemicals or generate bioproducts such as manure that are potentially toxic or may adversely affect wildlife species, habitat, or water quality shall incorporate measures to ensure that application of such chemicals does not result in discharge to the MSHCP Conservation Area. Measures such as those employed to address drainage issues shall be implemented.
3. Lighting: Night lighting shall be directed away from the MSHCP Conservation Area to protect species within the Conservation Area from direct night lighting. Shielding shall be incorporated in project designs to ensure ambient lighting in the MSHCP Conservation Area is not increased.
4. Noise: Proposed noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on Conservation Area resources pursuant to applicable rules, regulations and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards.
5. Invasives: When approving landscape plans for development that is proposed adjacent to the MSHCP Conservation Area, permittees shall avoid the use of invasive species for the portions of development that are adjacent to the Conservation Area.
6. Barriers: Proposed land uses adjacent to the MSHCP Conservation Area shall incorporate barriers, where appropriate in individual project designs to minimize unauthorized public access, domestic animal predation, illegal trespass or dumping. Such barriers may include native landscaping, rocks/boulders, fencing, walls, signage and/or other appropriate mechanisms.

7. Grading/Land Development: Manufactured slopes associated with proposed site development shall not extend into the MSHCP Conservation Area.

**Mitigation Measure BR-3:** As discussed in Section 7, *Wildlife & Vegetation* the Project site located within the Criteria Area of the MSHCP. Therefore, the proposed day use parking and staging area would be subject to the JPR process by the RCA. The proposed Project would use the “take” permits for federally listed and state-listed species granted under the MSHCP.

**Mitigation Measure BR-4:** Stephens’ kangaroo rat is covered by a separate habitat conservation plan administered by the RCHCA (RCHCA 1990). Prior to the initiation of construction activities RivCoParks shall consult with the RCA and the RCHCA and negotiate payment of the SKRHCP fee. If it is determined by either the RCA or the RCHCA that the SKRHCP does not apply, then RivCoParks shall retain a qualified biologist to conduct focused nocturnal live-trapping surveys, necessary to conclusively determine whether the on-site kangaroo rat is Stephens’ kangaroo rat.

**Mitigation Measure BR-5:** The Project site is located within the MSHCP designated burrowing owl survey area and potential habitat, albeit low quality, is present within the vicinity. Therefore, pre-construction burrowing owl surveys shall be conducted by a qualified biologist in compliance with the MSHCP guidelines. During pre-construction surveys for burrowing owls, any other special status plant and wildlife species that are encountered shall also be identified. Any special status animal species found in the Project site during the pre-construction survey shall be left to leave on its own or shall be relocated prior to construction by the qualified biologist to an off-site area that provides suitable habitat conditions, as determined by the qualified biologist in coordination with RivCoParks and the RCA.

**Mitigation Measure BR-6:** Prior to the initiation of construction-related activities, a Worker Environmental Awareness Program (WEAP) training shall be provided by a qualified biologist to ensure that work crews know how to identify and avoid special status plant and animal species that could occur within the Project site during construction. Additionally, a qualified biologist shall be present during all vegetation clearing and initial soil disturbance to monitor these construction activities and identify any special status plant and wildlife species that may occur within the Project site. Any special status animal species found in the Project site during the construction shall be left to leave on its own or shall be relocated prior to construction by the qualified biologist to an off-site area that provides suitable habitat conditions, as determined by the qualified biologist in coordination with RivCoParks and the RCA.

**Mitigation Measure BR-7:** To the maximum extent feasible, construction activities shall be conducted outside of the local nesting season for birds, which can be expected in the region from approximately February 15 through August 31. If construction activities are scheduled to occur during the nesting season, a qualified biologist shall conduct a nesting bird survey no more than 3 days prior to the start of construction. Consistent with CDFW recommendations, if any nesting birds or raptors are observed, the biologist shall clearly mark the location of the nest (e.g., with staking and flags), which should be avoided until the nestlings have fledged (i.e., left the nest), as determined by the biologist. Further, the biologist, in coordination with RivCoParks and the RCA, shall identify any additional measures necessary to avoid potential adverse impacts on nesting birds. Appropriate measures may include attenuating construction noise (through sound-dampening boards or other equipment) to a level of 60 A-weighted decibels (dBA) (1-hour  $L_{eq}$ ) or otherwise limiting disturbances within a buffered distance of the nest – to be determined by the biologist in coordination with the RCA – until nesting is complete. If the level of 60 dBA cannot be achieved, the biologist shall be present during construction activities to ensure that nesting birds are not disturbed. The biologist shall halt any construction activity determined to be potentially disturbing for any nesting bird. Construction may continue when the biologist

determines the activity can be carried out without disruption of nesting, or when the nestlings have fledged.

**Monitoring:** Compliance with these mitigation measures would be subject to periodic site inspections by the Riverside County Planning Department.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>CULTURAL RESOURCES</b> Would the project:				
<b>8. Historic Resources</b>				
a) Alter or destroy a historic site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of a historical resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Between September 2017 and March 2018, Amec Foster Wheeler conducted an intensive Phase I cultural resources survey and subsequent Extended Phase I Cultural Resources excavation. The intensive ground surface survey was conducted throughout the entire the Area of Project Effect (APE), including 1.8 acres of undeveloped and semi-developed land at the southeastern corner of the Park. Amec Foster Wheeler conducted an archaeological and historical resources records search as an element of the investigations (Amec Foster Wheeler 2018a), consultation with the Native American Heritage Commission (NAHC) and appropriate tribal representatives (see Section 39, *Tribal Cultural Resources*).

**Records Search**

The background archaeological record search was conducted on September 8, 2017 at the Eastern Information Center (EIC) of the University of California, Riverside. The records search identified 18 previously completed cultural resource inventory surveys within and extending 1 mile from the APE, but none were conducted within the APE. A total of 33 prehistoric resources and two historic-era resources have been recorded within 1 mile of the APE, but none of these are recorded within the APE. A majority of the recorded prehistoric resources consisted of bedrock milling features associated with seed and vegetable processing, while the recorded historic-era resources included a refuse scatter, mining features, a bridge, and a dam. Given the results of the previous cultural resource inventory surveys conducted in the vicinity of the APE, the prehistoric sensitivity of the APE was determined to be high, while the historic-era archaeological sensitivity of the APE was determined to be low to moderate (Amec Foster Wheeler 2018a).

**Native American Consultation**

On September 27, 2017, Amec Foster Wheeler submitted a Sacred Lands File request to the NAHC to determine the presence of any tribal cultural sites recognized within or in the vicinity of the Project APE. On September 29, 2017, the NAHC responded that the Sacred Lands File records search did identify tribal cultural sites within the APE that may be impacted by the proposed Project. The NAHC provided a list of 37 tribal representatives to contact regarding the proposed Project. Amec Foster Wheeler sent letters to the 37 tribal representatives on October 27, 2017, to request specific information regarding cultural resources within or near the APE (see Section 39, *Tribal Cultural*). Of the 37 tribal representatives contacted, 12 tribal representatives responded to the letter, including the Pechanga Band, Soboba Band, Viejas Band, Augustine Band, La Jolla Band, Manzanita Band, Morongo Band,

Ramona Band, Agua Caliente Band, Rincon Band, Santa Rosa Band, and Pauma Band. The majority of responses deferred to a later time or to the local tribes. Joseph Ontiveros of the Soboba Band asked that Riverside County initiate and continue correspondence with the Tribe, that he receive project information, that the Tribe have the opportunity to monitor any ground disturbing activities during implementation of the proposed Project, that the proper procedures and requests of the Tribe be honored and included a regulatory framework for the treatment of cultural items and human remains. Planning Specialist Tuba Ebru Ozdil of the Pechanga Band stated that the APE is in a highly sensitive area for cultural resources and human remains and asked that a qualified archaeologist and Pechanga Band tribal monitor be present during future earthmoving activities, including tree removal. She also asked to be notified of the entitlement process and to receive all pertinent archaeological reports, resource files, and grading plans. Ms. Ozdil also requested formal government-to-government consultation with Riverside County, the Lead Agency. The remaining Tribal representatives were called on November 15, 2017, but have not replied as of this time. See Section 39, *Tribal Cultural Resources* for further discussion of the Native American consultation efforts conducted for the proposed Project.

### *Intensive Field Survey*

An intensive ground surface survey of the APE was conducted on November 22, 2017. The pedestrian survey included walking east-west transects of the entire APE, spaced no more than 50 feet apart. The ground surface was visually inspected for any signs of human use dating to more than 50 years old. Areas with disturbed or exposed soils were particularly scrutinized for indications of cultural materials. Modern trash, including rusted metal objects and cans used for target practice, were observed on the ground surface within the APE; however, these items were determined not any have historic value. Two historic-era resources were encountered during the field survey: an isolated hole-in-top can; and a campsite, consisting of of a metal can scatter and two fire pits. The two resources were documented on California Department of Parks and Recreation Series 523 site forms.

### *Extended Phase I Excavation*

A focused Extended Phase I subsurface excavation was conducted on February 23, 2018 with a tribal representative of the Pechanga Band. Two 20-inch diameter shovel test probes (STPs) were excavated within the area where historic period campsite surface artifacts had been recorded to determine whether or not the resource contained a subsurface cultural resource component and evaluate the function and age of the rock assemblages. Soils from the STPs were systematically screened and recovered charcoal, ash, melted glass, a wire nail, and a staple, which are all indicative of a localized camp fire and associated camping activities. No other cultural materials were encountered during the subsurface testing effort. No artifacts were able to provide a specific date as to when the campsite was occupied.

As defined by CEQA Public Resources Code Section 5020.1(j), a historical resource consists of, but is not limited to, "any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California." In addition, CEQA Guidelines define historical resources as: 1) resources listed in or eligible for listing in the CRHR; 2) listed in a local register of cultural resources; or 3) determined to be significant by a Lead Agency (California Code of Regulations 15064.5[a][1]-[3]). A resource may be eligible for listing in the CRHR if it meets any one of the ensuing criteria (Public Resources Code 5024.1[c]):

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to CEQA Guidelines Criteria, Riverside County has established the following criteria for listing a resource as a Riverside County Historical Landmark (Riverside County Historical Commission 2008):

1. Is associated with events that have made a significant contribution to the broad patterns of Riverside County's history and cultural heritage.
2. Is associated with the lives of persons important to the history of Riverside County or its communities.
3. Embodies the distinctive characteristics of a type, period, Riverside County region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.
4. Has yielded or may be likely to yield, information important in Riverside County, state of California, or national prehistory or history.

The hole-in-top can is an isolated artifact and does not have the potential to yield unique information about significant events, persons, time periods, the County, or the State. Therefore, this feature is not eligible for the CRHR. The campsite is older than 50 years; however, it is not associated with a significant historic event or broad patterns in history (Criterion 1 of the CRHR), is not associated with persons of historical significance (Criterion 2 of the CRHR), does not have distinctive characteristics (Criterion 3 of the CRHR), and is not likely to yield important data about prehistory or history (Criterion 4 of the CRHR). Therefore, the campsite is not eligible for the CRHR and does not qualify as a "historical resource" under CEQA. Additionally, the campsite is not eligible as a Riverside County Historical Landmark. Therefore, the Phase I intensive surface survey and subsequent focused Extended Phase I Cultural Resources Inventory did not identify and potentially significant prehistoric or historic-era resources within the APE.

**Source(s):** Phase I and Extended Phase I Cultural Resources Investigation

**Findings of Fact:**

a, b) **Less Than Significant with Mitigation Incorporated.** No potentially significant prehistoric or historic sites or resources eligible for listing in the CRHR or as a Riverside County Historical Landmark were identified within the Phase I ground surface survey and subsequent Extended Phase I Cultural Resources Inventory prepared for the proposed Project (Amec Foster Wheeler 2018a). Additionally, construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. Therefore, the potential to encounter previously unknown buried archaeological resources would be low. Nevertheless, due to the undeveloped nature of the Project site, Mitigation Measures CUL-1 through CUL-6 would ensure that construction workers would be prepared in the event that a previously unknown buried archaeological resource is encountered during grading activities. Mitigation Measures CUL-1 through CUL-6 describe the standard protocols for evaluation and recovery of archaeological resources at the Project site. With implementation of Mitigation Measures CUL-1 through CUL-6, impacts would be less than significant with mitigation incorporated.

Mitigation: The potential adverse impacts to cultural resources would be mitigated to a less than significant level through implementation of the measures described below.

**Mitigation Measure CUL-1:** Prior to issuance of grading permits, RivCoParks shall retain a Riverside County-certified Registered Professional Archaeologist to develop and implement a Cultural Resource Monitoring Program (CRMP). The CRMP shall address the details of all activities; provide procedures that must be followed in order to reduce the impacts to cultural and historic resources to a level that is less than significant; and address potential impacts to undiscovered buried archaeological resources associated with the proposed Project. The CRMP shall be provided to the RivCoParks for review and approval prior to issuance of the grading permit.

The CRMP shall contain at a minimum the following:

- a. Qualified Archaeological Monitor – An adequate number of Qualified Archaeological Monitors shall be on-site to ensure all earth moving activities are observed for areas being monitored. This includes all grubbing, grading, and trenching on-site. Inspections shall vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections shall be determined and directed by the Registered Professional Archaeologist. The Registered Professional Archaeologist may submit a detailed letter to RivCoParks during grading requesting a modification to the monitoring program if circumstances are encountered that reduce the need for monitoring.
- b. Cultural Sensitivity Training – The Registered Professional Archaeologist, and a representative of the consulting tribe(s), shall attend the pre-grading meeting with the contractors to provide Cultural Sensitivity Training for all construction personnel. Training shall include a brief review of the cultural sensitivity of the Project site and the surrounding area; the areas to be avoided during grading activities; what resources could potentially be identified during earthmoving activities; the requirements of the monitoring program; the protocols that apply in the event unanticipated cultural resources are identified, including who to contact and appropriate avoidance measures until the find(s) can be properly evaluated; and any other appropriate protocols. This shall be a mandatory training and all construction personnel must attend prior to beginning work on the Project site. A sign-in sheet for attendees of this training shall be included in the Cultural Resources Monitoring Report.

**Mitigation Measure CUL-2:** Unanticipated Resources – If unanticipated cultural resources are discovered during ground disturbing activities, the following provisions shall apply:

- a. All ground disturbing activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the Registered Professional Archaeologist, the Native American monitor, and RivCoParks to discuss the significance of the find. At the meeting, the significance of the discoveries shall be discussed and after consultation with the Registered Professional Archaeologist and the Native American monitor, a decision shall be made, with the concurrence of RivCoParks, as to the appropriate mitigation (e.g., documentation, recovery, avoidance, etc.) for the cultural resources.
- b. Ground disturbance shall not resume within the area of the discovery until RivCoParks, in consultation with the Registered Professional Archaeologist and the Native American

monitor, has reached a decision as to the appropriate mitigation. Work shall be allowed to continue outside of the buffer area and will be monitored by tribal monitor(s), if needed.

- c. If the find is determined to be significant and avoidance is infeasible, a Phase III Data Recovery Plan shall be prepared by the Registered Professional Archeologist, in consultation with the Native American monitor, and shall be submitted to RivCoParks for review and approval prior to implementation of the plan.
- d. Pursuant to California Public Resources Code Section 21083.2(b), avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the Registered Professional Archeologist and the Native American monitor cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues shall be presented to RivCoParks. RivCoParks shall make the determination based on the provisions of CEQA with respect to archaeological resources, recommendations of the Registered Professional Archeologist and shall take into account the cultural and religious principles and practices of the tribe(s).

**Mitigation Measure CUL-3:** Prior to the issuance of grading permits, RivCoParks shall enter into an agreement with the consulting tribe(s) or (a) Native American monitor(s). The Native American monitor(s) shall be on-site during all initial ground disturbing activities and excavation of each portion of the project site including clearing, grubbing, tree removals, grading, and trenching. In conjunction with the Qualified Archaeological Monitor, the Native American monitor(s) shall have the authority to temporarily divert, redirect, or halt the ground disturbance activities to allow identification, evaluation, and potential recovery of cultural resources. RivCoParks shall submit a fully executed copy of the agreement to the Registered Professional Archeologist as verification of compliance with this requirement.

**Mitigation Measure CUL-4:** Cultural resources shall be preserved in place, where feasible. Preservation in place is defined as avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resource. When preservation in place is not feasible, upon completion of ground disturbing activities, resources recovered during construction activities and made available by the affected landowner(s), the following procedures shall be carried out for final disposition of the discoveries:

- a. Historic Resources – All historic archaeological materials recovered during the archaeological investigations shall be curated at a Riverside County curation facility that meets State Resources Department office of Historic Preservation Guidelines for the Curation of Archeological Resources ensuring access and use pursuant to the Guidelines.
- b. Prehistoric Resources (reburial of the resources on the Project site) – Any reburial of resources on the Project site shall be performed in a manner and location that shall ensure they are protected from any future impacts in perpetuity. Reburial shall not occur until all legally required cataloguing, analysis, and studies have been completed on the cultural resources, with an exception of sacred items, grave goods, and Native American human remains. Human remains and grave goods shall not be subjected to testing, cataloguing, studies, or laboratory analysis unless approved in writing by the Most Likely Descendant. Listing of contents and location of the reburial shall be included in the confidential Cultural Resources Monitoring Report. The Cultural Resources Monitoring Report shall be filed with the District under a confidential cover and not subject to a Public Records Request.

- c. Prehistoric Resources (if reburial is not agreed upon by the consulting tribes) – The resources shall be curated at a culturally appropriate manner at a Riverside County curation facility that meets State Resources Department office of Historic Preservation Guidelines for the Curation of Archeological Resources ensuring access and use pursuant to the Guidelines. The collection and associated records shall be transferred, including title, and are to be accompanied by payment of the fees necessary for permanent curation. Evidence of curation in the form of a letter from the curation facility stating that subject archaeological materials have been received and that all fees have been paid, shall be maintained on file at RivCoParks.

**Mitigation Measure CUL-5:** Upon completion of ground disturbing activities, a Phase IV Cultural Resources Monitoring Report shall be prepared, consistent with the County of Riverside Planning Department Cultural Resources (Archaeological) Investigations Standard Scope of Work. The report shall include results of any feature relocation or residue analysis required as well as evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting and evidence that any artifacts have been treated in accordance to procedures stipulated in the Cultural Resources Monitoring Program. Once the report is determined to be adequate, two (2) copies shall be submitted to the Eastern Information Center (EIC) at the University of California Riverside (UCR) and one (1) copy shall be submitted to the consulting tribe(s).

**Mitigation Measure CUL-6:** If human remains are encountered, California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the Riverside County Coroner has made the necessary findings as to origin. Further, pursuant to Public Resource Code Section 5097.98(b), remains shall be left in place and free from disturbance until a final decision as to the treatment and disposition has been made. If the Riverside County Coroner determines the remains to be Native American, the NAHC shall be contacted within the period specified by law (i.e., 24 hours). Subsequently, the NAHC shall identify the "most likely descendant." The most likely descendant shall then make recommendations and engage in consultation concerning the treatment of the remains as provided in Public Resources Code Section 5097.98.

Monitoring: Compliance with these mitigation measures would be subject to periodic site inspections by the Riverside County Planning Department.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>9. Archaeological Resources</b>				
a) Alter or destroy an archaeological site?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to California Code of Regulations, Section 15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Source(s):** Extended Phase I Cultural Resources Inventory

Findings of Fact:



a, b) **Less Than Significant with Mitigation Incorporated.** As described in Section 8, *Cultural Resources*, the Phase I Extended Cultural Resources Inventory determined that no prehistoric or historic archaeological resources or sites have been previously recorded within the APE and none were encountered during the pedestrian field survey conducted within the APE (Amec Foster Wheeler 2018a). Additionally, construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. Therefore, the potential to encounter previously unknown buried archaeological resources would be low. Nevertheless, due to the undeveloped nature of the Project site, Mitigation Measures CUL-1 through CUL-6 would ensure that construction workers would be prepared in the event that a previously unknown buried archaeological resource is encountered during grading activities. Mitigation Measures CUL-1 through CUL-6 describe the standard protocols for evaluation and recovery of archaeological resources at the Project site. With implementation of Mitigation Measures CUL-1 through CUL-6, impacts would be less than significant with mitigation incorporated.

c) **Less Than Significant with Mitigation Incorporated.** The NAHC was contacted on September 27, 2017 to determine if there were any known Native American resources within or immediately adjacent to the APE. On September 29, 2017, the NAHC responded that the Sacred Lands File records search did identify sites within the APE that may be impacted by the proposed Project. The NAHC provided a list of 37 tribal representatives – including the Pechanga Band of Luiseno Indians – to contact regarding the proposed Project. Planning Specialist Tuba Ebru Ozdil of the Pechanga Band stated that the APE is in a highly sensitive area for cultural resources and human remains and asked that a qualified archaeologist and Pechanga Band tribal monitor be present during future earthmoving activities, including tree removal. Implementation of TC-1, which would require monitoring by a qualified archaeologist and Pechanga Band tribal monitor during all ground disturbing activities as requested, would reduce the potential for construction to disturb human remains. In the event that Native American resources or human remains are discovered during construction activities, implementation of Mitigation Measure CUL-3 and TC-1 would reduce potential impacts to less than significant levels with mitigation incorporated.

**Mitigation:** Refer to Mitigation Measures CUL-1 through CUL-6 and see Mitigation Measure TC-1.

**Monitoring:** Compliance with these mitigation measures would be subject to periodic site inspections by the Riverside County Planning Department.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>ENERGY</b> Would the project:				
<b>10. Energy Impacts</b>				
a) Result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a State or Local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan; Riverside County Climate Action Plan

**Findings of Fact:**

a) **Less Than Significant.** Consumption of energy resources associated with the proposed Project would be generally limited to the minor amount haul truck trips, concrete truck trips, and construction worker commutes. Additional consumption of energy resources would occur as a result of the operation of heavy construction equipment and the watering of on exposed soils during grading consistent with SCAQMD Rule 403 (refer to BMP AQ-1). The proposed Project does include permanent restrooms or lighting and therefore, there would be no additional operational energy use. Any consumption of energy resources associated with Park visitors and maintenance activities would be negligible as the proposed day use parking and staging area is not anticipated to substantially increase Park visitation or maintenance requirements (refer to Section 6, *Air Quality*). Therefore, potential impacts related to energy use would be less than significant.

b) **No impact.** Based on the limited scope of the proposed Project, neither construction nor operation of the proposed day use parking and staging area would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, there would be no impact associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>GEOLOGY AND SOILS</b> Would the project directly or indirectly:				
<b>11. Alquist-Priolo Earthquake Fault Zone or County Fault Hazard Zones</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?				

**Source(s):** Riverside County General Plan Figure S-2, *Earthquake Fault Study Zones*; Fault Activity Map of California (2010)

Findings of Fact:

a) **Less Than Significant.** The Project site is not located within an Alquist-Priolo Earthquake Fault Zone. The nearest active faults to the Project site are the Glen Ivy North Fault, located approximately 8 miles from the Project site, and the Casa Loma Fault, located approximately 16 miles from the Project site (California Department of Conservation 2010). Therefore, the likelihood of surface fault rupture and related hazards at the Project site is considered to be low and impacts would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

	Mitigation Incorporated			
<b>12. Liquefaction Potential Zone</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be subject to seismic-related ground failure, including liquefaction?				

**Source(s):** Riverside County General Plan Figure S-3, *Generalized Liquefaction*

Findings of Fact:

a) **No Impact.** Liquefaction occurs when saturated, cohesionless soils temporarily lose shear strength (i.e., liquefy) due to increased pore water pressures induced by strong, cyclic ground motion during an earthquake. According to the California Department of Conservation’s Earthquake Zones of Required Investigation, the Project site is not within an area susceptible to liquefaction (California Department of Conservation 2020b). Therefore, there would be no impact associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>13. Ground-shaking Zone</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be subject to strong seismic ground shaking?				

**Source(s):** California Geological Survey (CGS) Earthquake Shaking Potential for California Map

Findings of Fact:

a) **Less Than Significant.** According to CGS maps, the Park is located in an area with low to moderate risk of ground shaking (CGS 2014). As previously described, the nearest fault is approximately 8 miles from the Project site. No habitable structures are proposed and as such the proposed Project would have limited potential for structural damage or loss of life related to seismic activity. Conformance with standard engineering practices and design criteria (e.g., California Building Code, etc.) would reduce potential impacts related to earthquake faults or seismic ground shaking to less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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<b>14. Landslide Risk</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, collapse, or rockfall hazards?				

**Source(s):** Riverside County General Plan Figure S-4, *Earthquake-Induced Slope Instability Map*; California Geological Survey Deep-Seated Landslide Susceptibility Map; California Department of Conservation Landslide Information Warehouse

Findings of Fact:

a) **No impact.** According to the CGS Deep-Seated Landslide Susceptibility Map the closest historical landslide was documented approximately 9 miles southeast of the Park in the Santa Ana Mountain Range (California Department of Conservation 2020a). The northern and western areas of the Park have higher hills and a moderate landslide susceptibility; however, the Project site and the entire southeast corner of the Park are relatively flat and do not have any landslide susceptibility (CGS 2018). Additionally, construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. As such implementation of the proposed Project would not introduce engineered slopes or otherwise increase the potential for landslide risk and there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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<b>15. Ground Subsidence</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in ground subsidence?				

**Source(s):** Riverside County General Plan Figure S-7, *Documented Subsidence Areas Map*

Findings of Fact:

a) **No Impact.** The Project site is characterized by the Vista soil series, which includes moderately deep, well drained soils that formed in material weathered from decomposed granitic rocks (Amec Foster Wheeler 2018b; U.S. Department of Agriculture Natural Resources Conservation Service 2017). According to the County General Plan Documented Subsidence Areas Map, the Project site is not located within a subsidence area (Riverside County 2019a). Therefore, there would be no impact associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>16. Other Geologic Hazards</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Be subject to geologic hazards, such as seiche, mudflow, or volcanic hazard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Safety Element

Findings of Fact:

a) **No Impact.** The Project site is located approximately 4 miles from Lake Mathews, the closest water body, and is not susceptible to seiches. The Project site is relatively flat and the entire surrounding southeast corner of the Park, including the Project site, has a low risk of landslides (refer to Section 14, *Landslide Risk*). The closest volcano is Salton Buttes, which is over 100 miles from the Project site. The most recent eruptions, which took place about 1,800 years ago, started explosively, then progressed to relatively gentle effusion of dense, glassy-looking (obsidian) lava domes. The Salton Sea Geothermal Field, which currently produces enough power to supply about 325,000 homes (U.S. Geological Survey [USGS] 2020). Therefore, the Project site is not susceptible to seiche, mudflow, or volcanic hazards and there would be no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>17. Slopes</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Change topography or ground surface relief features?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create cut or fill slopes greater than 2:1 or higher than 10 feet?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in grading that affects or negates subsurface sewage disposal systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Safety Element

Findings of Fact:

a) **Less Than Significant.** The Project site is generally located at an elevation of 2,000 to 2,050 feet above mean sea level. The proposed changes in topography associated with the proposed day use parking and staging area would be minor and impacts would be less than significant.

b, c) **No Impact.** Construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. The proposed Project would not create cut or fill slopes greater than 2:1 or higher than 10 feet. Additionally, the proposed Project would not include the construction of permanent restrooms or otherwise require or affect sewage disposal systems. Therefore, there would be no impacts associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>18. Soils</b>				
a) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Be located on expansive soil, as defined in Section 1802.3.2 of the California Building Code (2007), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have soils incapable of adequately supporting use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** U.S. Department of Agriculture Natural Resources Conservation Service Web Soil Survey, MSHCP Consistency Analysis

Findings of Fact:

a) **Less Than Significant.** Implementation of the proposed Project would result in soil disturbance from minor grading activities during the construction phase. However, all construction activities would be required to comply with standard engineering practices for erosion control (refer to discussion of SCAQMD requirements in Section 6, *Air Quality*; see also Section 23, *Water Quality Impacts*). Any minor potential for soil erosion impacts would be effectively avoided through implementation of these procedures. Following construction, the proposed Project would not increase the potential for soils to be subject to erosion. Overall, it is anticipated that impacts to substantial erosion or the loss of topsoil as a result of the proposed Project would be less than significant.

b, c) **No Impact.** Expansive soils have a significant amount of clay particles which can give up water (i.e., shrink) or take on water (i.e., swell). The change in volume exerts stress on buildings and other loads placed on these soils. The occurrence of these soils is often associated with geologic units having marginal stability (Riverside County 2019a). The Project site is characterized by the Vista soil series, which includes moderately deep, well drained soils that formed in material weathered from decomposed granitic rocks (Amec Foster Wheeler 2018b; U.S. Department of Agriculture Natural Resources Conservation Service 2017). The Project site is not located on expansive soil and no habitable structures are proposed. Additionally, the proposed Project would not include the construction of permanent restrooms that would require septic tanks or alternative waste water systems. Therefore, there would be no impacts associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>19. Wind Erosion and Blows and from project either on or off site.</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Be impacted by or result in an increase in wind erosion and blows and, either on or off site?				

**Source(s):** Riverside County General Plan Figure S-8, *Wind Erosion Susceptibility Map*; County Ordinance Number 460, Article XV; County Ordinance Number 484

Findings of Fact:

a) **Less Than Significant.** According to the Riverside County General Plan Wind Erosion Susceptibility Map, the Project site is located within an area considered to have a moderate wind erodibility rating. However, construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. construction activities. Additionally, all exposed soils would be watered during grading consistent with SCAQMD Rule 403 (refer to BMP AQ-1). Following the completion of construction activities, the proposed day use parking and staging area would be covered with native soil and stabilizers as well as decomposed granite in the picnic table area. Therefore, the potential for wind erosion as a result of the proposed Project would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>GREENHOUSE GAS EMISSIONS</b> Would the project:				
<b>20. Greenhouse Gas Emissions</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Greenhouse gases (GHGs) trap heat in the atmosphere and occur from natural processes as well as human activities. Human activities that produce GHGs are the burning of fossil fuels (e.g., coal, oil, and natural gas for heating and electricity, gasoline and diesel for transportation); methane (CH<sub>4</sub>) from landfill wastes and raising livestock, deforestation activities; and some agricultural practices. Scientific evidence indicates a correlation between the worldwide proliferation of GHG emissions by mankind

over the past century and increasing global temperatures (Intergovernmental Panel on Climate Change [IPCC] 2014). The principal GHGs that enter the atmosphere because of human activities are:

- **Carbon dioxide (CO<sub>2</sub>)** enters the atmosphere through the burning of fossil fuels (e.g., oil, natural gas, and coal), agriculture, irrigation, and deforestation, as well as the manufacturing of cement.
- **Methane (CH<sub>4</sub>)** is emitted through the production and transportation of coal, natural gas, and oil, as well as from livestock. Other agricultural activities (e.g., ranching, dairy production, and fertilizer) influence CH<sub>4</sub> emissions as well as the decay of waste in landfills.
- **Nitrous oxide (N<sub>2</sub>O)** is released most often during the burning of fuel at high temperatures. This GHG is caused mostly by motor vehicles, which also include non-road vehicles, such as those used for agriculture.
- **Fluorinated Gases** are emitted primarily from industrial sources, which often include hydrofluorocarbons (HFC), perfluorocarbons (PFC), and sulfur hexafluoride (SF<sub>6</sub>). Though they are often released in smaller quantities, they are referred to as High Global Warming Potential Gases because of their ability to cause global warming.

These gases have different potentials for trapping heat in the atmosphere, called global warming potential (GWP). For example, 1 pound of CH<sub>4</sub> has 21 times more heat capturing potential than 1 pound of CO<sub>2</sub>. When dealing with an array of emissions, the gases are converted to carbon dioxide equivalents (CO<sub>2</sub>e) for comparison purposes. The analysis for this Initial Study uses the screening threshold recommended by the SCAQMD of 3,000 metric tons of CO<sub>2</sub>e (MT CO<sub>2</sub>e) per year (SCAQMD 2008).

The greatest GHG emissions source associated with development and land use projects in California is vehicle emissions. The second greatest source is energy consumption, including natural gas and electricity use. As described under Section 6, *Air Quality*, the proposed Project would require haul truck trips, concrete truck trips, construction worker commutes, and heavy construction equipment use. These sources of GHG emissions were included in CalEEMod to accurately estimate the worst-case emissions for the proposed Project (see Table 8). The GHG emissions are expressed in units of MT CO<sub>2</sub>e per year. Construction-related GHG emissions for the proposed Project in 2020 from on-site (i.e., construction equipment) and off-site (i.e., haul trucks, vendor trucks, construction worker vehicles) emission sources would not exceed the SCAQMD threshold (see Table 8).

**Table 8. Estimated Annual Construction GHG Emissions**

		MT CO <sub>2</sub> e per year
Construction Emissions	2020	32.70
	Amortized over 30 Years	<b>1.09</b>
Operational Emission	Area	<0.00
	Energy	0.00
	Mobile	92.65
	Overall	<b>92.65</b>
<b>Total</b>		<b>93.74</b>
SCAQMD Threshold of Significance		3,000
<b>Significant?</b>		<b>No</b>
Source: CalEEMod Version 2016.3.2; see Appendix D.		



The proposed Project would result in a negligible increase in long-term GHG emissions due to visitor trips to and from the proposed day use parking and staging area as well as periodic vehicle trips for site maintenance. As described in Section 6, *Air Quality*, visitor trips to the Project site were modeled in CalEEMod based on the ITE trip generation rates for a 325-acre public park (see Appendix D). However, the proposed day use parking and staging area would provide parking for visitors that are already accessing the Park. Therefore, the net increase in operational emissions over the course of a year would be negligible. Nevertheless, this conservative analysis assesses the operational emissions as if all of these visitors would be newly generated by the proposed Project. Even with this conservative assumption, total operational emissions would be well below the SCAQMD thresholds and would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

**Source(s):** Riverside County General Plan; Riverside County Climate Action Plan

Findings of Fact:

a) **Less Than Significant.** According to the CalEEMod analysis conducted for the proposed Project, construction and operation of the proposed day use parking and staging area would result in a total of 93.74 MT CO<sub>2</sub>e of GHG emissions. Therefore, the total GHG emissions would be well below the applicable screening threshold of 3,000 MTCO<sub>2</sub>e and impacts related to GHG emissions would be less than significant.

b) **No Impact.** The proposed Project does not include any new uses or facilities that would generate a substantial increase in operational GHG emissions. GHG emissions from construction and operation would be negligible and would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the GHG emissions.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>HAZARDS AND HAZARDOUS MATERIALS</b> Would the project:				
<b>21. Hazards and Hazardous Materials</b>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
it create a significant hazard to the public or the environment?				
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Government Code Section 65962.5 requires the California Environmental Protection Agency (Cal EPA) to develop and annually update the Hazardous Waste and Substances List – Site Cleanup (Cortese) List. Information on the location of hazardous material sites contained in the Cortese List is provided by the California Department of Toxic Substances Control (DTSC). A review of the Cortese List indicates that there are no identified hazardous materials release sites located within the Project site or immediate vicinity. In addition, a review of the DTSC EnviroStor Database did not identify any cleanup sites or hazardous waste facilities within the immediate Project vicinity (DTSC 2020). The former Idaleona Mine is located approximately 0.7 miles southeast of the Project site, but contamination related to this site is not known and not likely to have migrated to the Project site.

The closest school is Columbia Elementary School, which is located approximately 4 miles northeast of the Project site. The closest public airport, Perris Valley Airport, is located in the City of Perris approximately 8 miles southeast of the Project site. The Project site is not located within the vicinity of a private airstrip. Public access to the Park is limited to Gavilan Road or Idaleona Road. The California Department of Forestry and Fire Protection (CAL FIRE) designates the Project site and the surrounding area as a Local Responsibility Area Very High Fire Hazard Severity Zone (Riverside County 2019b).

**Source(s):** Riverside County General Plan Safety Element; DTSC EnviroStor Database

**Findings of Fact:**

a, b) **Less Than Significant.** During construction activities, typical construction-related hazardous materials would be used at the Project site, including petroleum, oils, and lubricants as well as hydraulic fluids for heavy construction equipment. The construction phase may include the transport and on-site storage of petroleum products for the purpose of fueling construction equipment. However, the use and transport of these materials during construction activities would be short-term in nature and would occur in accordance with standard construction BMPs included in the Storm Water Pollution Prevention Plan (SWPPP) required in accordance with the NPDES Construction General Permit to control the discharge of material from the Project site (see Section 23, *Hydrology and Water Quality*). All transport, handling, use, and disposal of substances such as petroleum products related to construction of the proposed day use parking and staging area would comply with applicable Federal, State, and local health and safety regulations. All vehicle fueling and maintenance would occur off-site. Additionally, RivCoParks

would be required to develop and implement a SWPPP per the requirements of the NPDES Construction General Permit to ensure that reasonably foreseeable risks of upset involving the release of hazardous materials into the environment are avoided and minimized. Following the completion of construction activities these materials would be removed from the Project site and no hazardous materials would be required for operation of the proposed day use parking and staging area. Therefore, impacts associated with the proposed Project would be less than significant.

c) **No Impact.** The Project site is not located within 0.25 miles of a school. Therefore, there would be no impact associated with the implementation of the proposed Project.

d) **No Impact.** According to the Cortese List and the DTSC EnvirStor Database, the Project site is not located within the vicinity of a contaminated site. Therefore, there would be no impact associated with the implementation of the proposed Project.

e) **No Impact.** The Project site is not located within an airport land use plan. Therefore, there would be no impact associated with the implementation of the proposed Project.

f) **No Impact.** Neither construction nor operation of the proposed day use parking and staging area would result in a significant increase in traffic congestion that might impede mobility during an emergency (see Section 37, *Transportation* and Section 44, *Wildfire*). Further, the proposed Project would not result in physical obstruction of any street or highway that is critical to evacuation in the event of an emergency. Therefore, there would be no impact associated with the implementation of the proposed Project.

g) **Less Than Significant.** While the Project site is located within a very high fire hazard severity zone, construction and operation of the proposed day use parking and staging area would not result in exposure of people or structures to risk of loss, injury or death involving wildland fires. The proposed Project would provide additional vehicle parking and limited recreational amenities (e.g., picnic tables); however, the proposed Project would not include any habitable structures. Further, the proposed day use parking and staging area would have a boundary sign prohibiting hunting, fires, shooting, and other potential ignition sources. Similar signage is also at the existing main park entrance and every 300 feet along Gavilan and Idaleona Road. Additionally, RivCoParks would continue to conduct regular weed abatement to reduce ladder fuels 100 feet from residences. Therefore, impacts associated with the proposed Project would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>22. Airports</b>				
a) Result in an inconsistency with an Airport Master Plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require review by the Airport Land Use Commission?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
d) For a project within the vicinity of a private airstrip, or heliport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan Figure S-20, *Airport Locations*; County of Riverside Transportation and Land Management Agency GIS Data Downloads

**Findings of Fact:**

a-d) **No Impact.** The Project site is located approximately 8 miles from the closest airport and is not covered by any Airport Master Plan. Therefore, there would be no impacts associated with the implementation of the proposed Project.

**Mitigation:** No mitigation is required.

**Monitoring:** No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>HYDROLOGY AND WATER QUALITY</b> Would the project:				
<b>23. Water Quality Impacts</b>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in substantial erosion or siltation on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-site or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
h) In flood hazard, tsunami, or seiche zones, risk the release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Source(s):** Riverside County General Plan Figure S-9, *Special Flood Hazard Areas*, Figure S-10, *Dam Failure Inundation Zone*; Riverside County Flood Control District Flood Hazard Report / Condition; County of Riverside Transportation and Land Management Agency GIS Data Downloads GIS Database; Jurisdictional Delineation

Findings of Fact:

a, d) **Less Than Significant.** As described in Section 7, *Wildlife & Vegetation*, the Project site is located approximately 300 feet to the north of an un-named drainage that conveys natural surface water flows and urban run-off from the surrounding single family rural residences and commercial land uses (refer to Figure 4). However, this drainage path supports only intermittent flows that occur during and immediately following heavy storm events and shows no evidence of an OHWM and/or definable bed and bank feature. Natural runoff in the vicinity of the Project site sheet flows across Piedras Road with no evidence of an OHWM and/or definable bed and bank feature

The 1.8-acre Project site would be leveled with minor grading necessary to maintain existing surface water drainage, which would continue to be directed from the east towards the interior of the Park to the northwest. Therefore, there is a potential for erosion and sedimentation during construction associated with the proposed Project. Because construction activities would disturb more than 1 acre, RivCoParks would be required to develop and implement a SWPPP prior to the commencement of any construction-related activities in accordance with the NPDES Construction General Permit. The SWPPP would include standard construction BMPs (e.g., off-site fueling and maintenance of construction equipment), which would be in place for the duration of the construction activities to avoid potential impacts to surface water quality due to potential pollutant discharge during construction activities. If construction becomes necessary during the rainy season. All required erosion control materials (e.g., straw bales, wattles, silt fence materials, etc.) would be available on-site and stockpiled at convenient locations to facilitate rapid installation of temporary devices or to repair any damaged erosion control measures when rain is imminent.

Following the completion of construction activities, the proposed day use parking and staging area would be covered with native soil and stabilizers as well as decomposed granite in the picnic table area. Surface water drainage continue to be directed from the east towards the interior of the Park to the northwest. Therefore, the potential for impacts related to erosion and water quality would be less than significant.

b) **No Impact.** Short-term water demand for construction-related activities (e.g., watering exposed soils pursuant to SCAQMD Rule 403) would be minimal. Given the location of the Project site, water would likely be imported to the Project site using a water truck. The proposed Project does not include permanent restrooms, water fountains, or any other facilities that require the use of water, therefore the proposed Project would not result in increased operation demand for domestic water. Given the limited

scope of the proposed Project, this demand would be minor and would have a negligible effect on local groundwater supplies.

The proposed Project would include an incremental increase in impervious surfaces at the Project site associated with the two ADA-accessible parking spaces. The remainder of the 1.8-acre Project site would include pervious ground cover – including native soil and decomposed granite. The proposed incremental increase in impervious surfaces would have a negligible effect on the potential for groundwater recharge within the groundwater basin. Therefore, the proposed Project would have no impact on groundwater supplies, groundwater recharge, or aquifers.

c, e-g) **Less Than Significant.** The Jurisdictional Delineation identified the headwaters of a downstream drainage feature, approximately 300 feet to the south of the Project site (refer to Figure 4). As described in Section 7, *Biological Resources*, natural runoff in the vicinity of the Project site flows across Piedras Road with no evidence of an OHWM and/or definable bed and bank feature. The 1.8-acre Project site would be leveled with minor grading necessary to maintain existing surface water drainage, which would continue to be directed from the east towards the interior of the Park to the northwest. Additionally, the proposed Project would not include any habitable structures that could be impacted by flooding during heavy storm events. Therefore, implementation of the proposed Project would result less than significant impacts related to stormwater drainage and flooding.

h) **No Impact.** No topographical features or water bodies capable of producing seiche, tsunami, or mudflow events are present within the vicinity of the Project site (refer to Section 11, *Geology and Soils*). The proposed Project would not increase the risk associated with seiche, tsunami, or mudflow beyond those of the existing conditions. Therefore, there would be no impact associated with the implementation of the proposed Project.

i) **Less Than significant.** Construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. The proposed day use parking and staging area would be covered with native soil and stabilizers as well as decomposed granite in the picnic table area. The implementation of standard construction BMPs from the SWPPP (e.g., off-site fueling and maintenance of construction equipment), would avoid potential impacts to surface water quality due to potential pollutant discharge during construction activities. The proposed Project does not include permanent restrooms, water fountains, or any other structures that require the use of domestic water. Therefore, the proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan because it would not increase demand for water supply at the Project site.

Mitigation: No monitoring is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>LAND USE/PLANNING</b> Would the project:				
<b>24. Land Use</b>				
a) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

adopted for the purpose of avoiding or mitigating an environmental effect?

b) Disrupt or divide the physical arrangement of an established community (including a low-income or minority community)?

The Project site is located within the Lake Mathews / Woodcrest Area Plan and is designated as Open Space-Conservation Habitat (OS-C H). This land use designation applies to public and private lands conserved and managed in accordance with an adopted MSHCP or other Conservation Plan(s) and in accordance with related Riverside County policies. Ancillary structures or uses may be permitted within this land use designation for the purpose of preserving or enjoying open space (Riverside County 2019a).

The entire Park, including the Project site, is located within the Gavilan Hills Policy Area. The Lake Mathews / Woodcrest Area Plan policies for the Gavilan Hills Policy Area encourages the construction of a day use parking area to serve peak parking demand at the Park. Existing and proposed uses and facilities are consistent with current zoning and General Plan designations for the Project site.

**Source(s):** Riverside County General Plan; Lake Mathews / Woodcrest Area Plan

Findings of Fact:

a) **No Impact.** The proposed Project would not change the existing land use of the Project site, and new recreational facilities would not conflict with the Riverside County General Plan policies. The proposed Project would implement a goal of the Lake Mathews / Woodcrest Area Plan, which encourages the construction of a day use parking area at the Park to accommodate peak parking demand.

b) **No Impact.** No long-term separation of land uses between land use types would occur as a result of the proposed Project. Temporary disruption of access along Piedras Road (e.g., haul truck trips or concrete truck trips) during construction would not disrupt recreational activities at the Park. Therefore, implementation of the proposed Project would not divide an established community and no impact would occur.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>MINERAL RESOURCES</b> Would the project:				
<b>25. Mineral Resources</b>				
a) Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Potentially expose people or property to hazards from proposed, existing, or abandoned quarries or mines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan Figure OS-6, Mineral Resources Area

**Findings of Fact:**

a-c) **No Impact.** According to the CGS referenced in the Riverside County General Plan (Riverside County 2015a), there are no mineral recovery sites on or near the Project site. The entire Park is in an area where the significance of mineral deposits are undetermined. However, given the nature of the proposed Project, it would not result in the permanent loss of availability of a potential mineral resource recovery site. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource and there would be no impact to mineral resources.

**Mitigation:** No mitigation is required.

**Monitoring:** No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>NOISE</b> Would the project result in:				
<b>26. Airport Noise</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) For a project located within an airport land use plan or, where such a plan has not been adopted, within two (2) miles of a public airport or public use airport would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan Figure S-20, *Airport Locations*

**Findings of Fact:**

a-b) **No Impact.** The nearest public airport, Perris Valley Airport, is located in the City of Perris approximately 8 miles southeast of the Project site. The Project site is not located within the planning area of an airport land use plan or within 2 miles of a public airport or public use airport; therefore, the proposed Project would not expose people residing or working within the vicinity of the Project site to excessive noise levels. The Project site is not within the vicinity of a private airstrip or heliport; therefore, the proposed Project would not expose people residing or working in the Project area to excessive noise levels and there would be no impact.

**Mitigation:** No mitigation is required.



Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>27. Noise Effects by the Project</b>				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan, noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive ground-borne vibration or ground-borne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*Construction Noise*

As previously described, there is one single family rural residence within 0.25 miles of the Project site, located directly south across Idaleona Road. Other sensitive receptors include Columbia Elementary School and Mead Valley Library, which are approximately 4 miles northeast of the Project site. Construction-related noise would be generated by minor grading activities, the operation of power tools, and truck trips. Construction noise levels were evaluated using data published by the U.S. Department of Transportation (DOT), as indicated in Table 9.

**Table 9. Noise Ranges of Typical Construction Equipment**

Construction Equipment	Noise Levels in dBA $L_{eq}$ at 50 Feet
Heavy Haul Trucks	82–95
Compressors	75–87
Concrete Mixers	75–88
Concrete Pumps	81–85
Back Hoe	73–95

Notes:

dBA: A-weighted decibels

$L_{eq}$ : Equivalent continuous sound level

Source: U.S. DOT Construction Noise Handbook 2006.

The noise generated by the use of heavy construction equipment would result in a temporary increase in ambient noise levels consistent with the general noise levels presented in Table 9. However, this increase would be intermittent, short-term (i.e., between 2 to 3 months), and temporary. Additionally, to the maximum extent feasible, RivCoParks would voluntarily limit construction activities to the hours between 6:00 AM and 6:00 PM during the months of June through September, and between 6:00 AM and 7:00 PM during the months of October through May, consistent with requirements codified in the County’s Noise Ordinance (Riverside County 2007). The County’s Noise Ordinance does not identify maximum noise levels for construction; however, given the distance to the existing sensitive receptors as well as the intervening topography, vegetation, and roadways that would dampen and/or attenuate construction-related noise, increases in ambient noise levels would not be noticeable.

## *Operational Noise*

Consistent with existing conditions at the Park, the proposed day use parking and staging area would be used during daytime hours only. Truck and horse trailer combinations and passenger vehicles may generate additional noise at the Park. The General Plan Noise Element states that stationary source land use noise cannot exceed 65 dBA  $L_{eq}$  for longer than 10 minutes from 7:00 AM to 10:00 PM outside within residential areas. No noise standards are provided for other non-residential land uses (Riverside County 2015b). Although rural residences are present to the east, west, and south of the Park, operational noise associated with vehicle trips to and from the proposed day use parking and staging area would be buffered by the surrounding topography, vegetation, and roadways and would not exceed those standards for residential uses.

**Source(s)**: Riverside County General Plan Noise Element

### Findings of Fact:

a) **Less Than significant.** During construction activities involving the use of the loudest piece of construction equipment (e.g., back hoe, which can generate noise levels of approximately 95 dBA at 50 feet), exterior noise levels at the nearest sensitive receptor would be approximately 67 dBA. This conservatively represents the construction noise levels based on attenuation with distance only and does not include additional noise dampening from topography, vegetation, and roadways that would further reduce potential increases in ambient noise. Additionally, to the maximum extent feasible, RivCoParks would voluntarily limit construction activities to the hours between 6:00 AM and 6:00 PM during the months of June through September, and between 6:00 AM and 7:00 PM during the months of October through May, consistent with requirements codified in the County's Noise Ordinance (Riverside County 2007).

Consistent with existing conditions at the Park, the proposed day use parking and staging area would be used during daytime hours only. Truck and horse trailer combinations and passenger vehicles may generate additional daytime noise at the Park. The General Plan Noise Element states that stationary source noise cannot exceed 65 dBA  $L_{eq}$  for longer than 10 minutes from 7:00 AM to 10:00 PM outside within residential areas. No noise standards are provided for other non-residential land uses (Riverside County 2015b). Although rural residences are present to the east, west, and south of the Park, operational noise associated with vehicle trips to and from the proposed day use parking and staging area would be buffered by the surrounding topography, vegetation, and roadways and would not exceed those standards for residential uses. Operational noise would be limited to truck and horse trailer combinations and passenger vehicles parking at the proposed day use parking and staging area as well as minor noise from talking and animals (e.g., horses, dogs, etc.). However, long-term operational activities associated with the proposed staging area would not generate substantial noise at or in the vicinity of the Park. Noise levels at the nearest sensitive receptor would continue to be dominated by vehicle traffic along Idaleona Road. As such, the proposed Project would not result in a temporary or permanent increase in ambient noise levels in excess of any established standards and impacts would be less than significant.

b) **Less Than Significant.** No permanent increase in groundborne vibration or groundborne noise levels would result from the implementation of the proposed Project. The proposed Project would involve intermittent use of heavy construction equipment for short-term construction activities, which has potential to cause a temporary increase in groundborne vibration. However, no excavation or pile driving would be required and groundborne vibrational from construction equipment would be minimal.

Additionally, no operational or maintenance activities associated with the proposed day use parking and staging area would result in groundborne vibration or groundborne noise. Therefore, impacts associated with the proposed Project would be less than significant.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>PALEONTOLOGICAL RESOURCES:</b>				
<b>28. Paleontological Resources</b>				
a) Directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Figure OS-8, *Paleontological Sensitivity*

Findings of Fact:

a) **No Impact.** According to the Riverside County General Plan, the entire Park, including the Project site, is in an area that is considered to have low paleontological sensitivity (Riverside County 2015a). Construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. Therefore, construction of the proposed day use parking and staging area would result in no impact.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>POPULATION AND HOUSING</b> Would the project:				
<b>29. Housing</b>				
a) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a demand for additional housing, particularly housing affordable to households earning 80% or less of the County's median income?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Source(s): Riverside County General Plan Housing Element

Findings of Fact:

a-c) **No Impact.** The proposed day use parking and staging area would not displace any existing people, establish new housing, or extend any roads or urban services. The proposed Project would not create demand for additional housing or induce substantial unplanned population growth because of its limited scale. Therefore, there would be no impact associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**PUBLIC SERVICES** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services:

**30. Fire Services**

Source(s): Riverside County General Plan Safety Element

Findings of Fact:

**No Impact.** The Riverside County Fire Department provides fire protection and emergency medical (i.e., paramedic) services within unincorporated portions of the County. Riverside County Fire Department Station 4, located approximately 3 miles north of the Project site, is the closest station to the Project site. During construction, emergency access to the Project site would be maintained along roadways, and there would be no lane closures. Following the completion of construction-related activities, the proposed Project would not result in a change in land use or activities. Nor would the proposed Project induce growth or substantially increase, either directly or indirectly, the need for fire protection services over existing conditions. The existing main park entrance and the proposed day use parking and staging area would have boundary sign states no hunting, no fires, no shooting, and etc. Similar signage is also located every 300 feet along Gavilan and Idaleona Road. Additionally, RivCoParks conducts regular weed abatement to reduce ladder fuels 100 feet from residences. Therefore, there would be no impact on fire services associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>31. Sheriff Services</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan Safety Element

Findings of Fact:

**No Impact.** The closest police station to the Project site is the City of Perris Police Station, located approximately 7 miles east of the Project site. Construction of the proposed day use parking and staging area is not anticipated to result in temporary interruption or delays for law enforcement response times. Additionally, operational of the proposed day use parking and staging area would neither measurably increase the demand for law enforcement nor require the construction of new facilities (i.e., police or sheriff stations). Therefore, there would be no impact on sheriff services associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>32. Schools</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Findings of Fact:

**No Impact.** No new residential units would be constructed as a part of the proposed Project, and the proposed Project would not result in new permanent populations that would require school facilities. Therefore, there would be no impact on schools associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>33. Libraries</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan

Findings of Fact:

**No Impact.** No new residential units would be constructed as a part of the proposed Project, and the proposed Project would not result in new permanent populations would increase demand on libraries or any other public services or facilities. Therefore, there would be no impact on libraries associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>34. Health Services</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Source(s): Riverside County General Plan

Findings of Fact:

**No Impact.** No new residential units would be constructed as a part of the proposed Project, and the proposed Project would not result in new permanent populations would increase demand on health services. Therefore, there would be no impact on health services associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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<b>RECREATION</b> Would the project:				
<b>35. Parks and Recreation</b>				
a) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located within a Community Service Area (CSA) or recreation and park district with a Community Parks and Recreation Plan (Quimby fees)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Source(s): County of Riverside Transportation and Land Management Agency GIS Data Downloads; County Ordinance Number 460, Section 10.35 (Regulating the Division of Land – Park and Recreation Fees and Dedications); County Ordinance Number 659 (Establishing Development Impact Fees)

Findings of Fact:

a) **Less Than Significant.** The proposed day use parking and staging area would provide a formal day use parking area for the Park as well as limited recreational amenities, including picnic tables and hitching posts for equestrian use. The proposed day use parking and staging area would provide connections to existing trails within the Park. However, the proposed day use parking and staging area would be an ancillary use intended to support the existing Park. Therefore, it would not require the construction or expansion of recreational facilities that could have an adverse physical effect on the environment and impacts would be less than significant

b) **Less Than Significant.** The proposed Project would provide formal parking for hikers, runners, mountain bikers, and equestrians that are already using the Park, but are parking in informal or undesignated overflow parking areas. As such, the implementation of the proposed Project would relieve congestion at the main park entrance and associated trail access points and improve overall operation of the Park. While the proposed Project may increase the use of the existing trails on the eastern side of the Park, implementation of the proposed Project would not result in any physical deterioration of these established trails. Therefore, impacts associated with the implementation of the proposed Project would be less than significant.

c) **No Impact.** The Project is not located within a Community Service Area (CSA) or a Community Parks and Recreation Plan. No development is proposed, therefore there would be no Quimby fees associated with the Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>36. Recreational Trails</b>				
a) Include the construction or expansion of a trail system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan Figure C-6, *Trails and Bikeway System*, Harford Springs Reserve Trail Map

Findings of Fact:

a) **No Impact.** The proposed Project would be limited to the construction of a day use parking and staging area, which would provide connections to existing trails on the eastern side of the Park, but would not include the construction of new trails or the expansion of the trail system. The proposed Project would include trail connections to existing trails near the Project site. Therefore, there would be no impact on recreational trails associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>TRANSPORTATION</b> Would the project:				
<b>37. Transportation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Cause an effect upon, or a need for new or altered maintenance of roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Cause an effect upon circulation during the project's construction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate emergency access or access to nearby uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Source(s):** Riverside County General Plan

**Findings of Fact:**

a, b) **No Impact.** Construction and operation of the proposed Project would not conflict with adopted policies, plans, and programs supporting alternative transportation. During construction activities, there would 500 cy of total earthwork; however, soil would be balanced site, with no soil export or import of fill material required for the proposed Project. A limited number of heavy haul trucks used to deliver equipment and materials to the Project site would access the Project site from Gavilan Road turning east onto Idaleona Road and turning north onto Piedras Road to access the Project site. Heavy construction equipment would remain in the construction staging area throughout the duration of construction and would further limit trips to and from the Project site. It is estimated that 1 to 7 construction workers would be required depending of the phase of construction (refer to Table 2), which would result in a maximum of 14 round trips per day during construction period. According to a technical advisory on evaluating transportation impacts from the State of California Governor's Office of Planning and Research (OPR), "[a]bsent substantial evidence indicating that a project would generate a potentially significant level of vehicle miles traveled (VMT), or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, projects that generate or attract fewer than 110 trips per day<sup>1</sup> generally may be assumed to cause a less than significant transportation impact" (OPR 2017). Therefore, because the proposed

<sup>1</sup> "CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area. (CEQA Guidelines Section 15301[e][2]) Typical project types for which trip generation increases relatively linearly with building footprint (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact" (OPR 2017).



construction activities would generate fewer trips than the OPR's threshold of 110 trips per day and impacts related to VMT would be less than significant.

The proposed Project would not conflict with any policies for roadways near the Project site and would not conflict with any congestion management programs within the County. The proposed Project would accomplish a goal of the Lake Mathews / Woodcrest Area Plan, which encourages the construction of a day use parking area at the Park to accommodate peak parking demand. The proposed Project would also reduce congestion on Gavilan Road and Idaleona Road during peak periods, which can be exacerbated by visitors parking vehicles along the side of the roadway when the informal parking area at the main park entrance is full.

Implementation of the proposed Project would have no adverse impacts on transportation.

c-f) **No Impact.** Local access to the Park is provided by Gavilan Road, which is a two-lane roadway that provides local north-south access, and Idaleona Road, which is an unmarked paved road that provides local east-west access. As previously described, the main entrance to the Park is provided east of Gavilan Road between Palomas Drive and Cajon Drive, along the western border of the Park (refer to Figure 2). A secondary entrance to the Park is provided by Piedras Road, located approximately 125 feet north of its intersection with Idaleona Road. Piedras Road begins as a paved road but becomes a dirt road shortly past a wooden gate that marks the entrance to the Park. The road is approximately 16 feet wide near the gate and extends for approximately 4,800 feet (0.90 miles), running along the eastern edge of the Park.

The unpaved loop would provide parking for approximately 10 truck and horse trailer combinations with trucks entering through the northernmost entry and parking along the edge of the loop. The passenger vehicle parking spaces would be located along the southern end of the proposed day use parking and staging area and would be striped or delineated using small rocks or down branches. Vehicles would exit the loop using the southernmost split exit, which would allow vehicles to turn left along Piedras Road to re-enter the unpaved loop or turn right along Piedras Road to exit the Park. Vehicles would be prevented from traveling past the day use parking and staging area into the Park by a pipe gate that would be installed as a part of the proposed Project (refer to Figure 3).

The proposed Project would not result in changes to the design of existing roadway configurations or other transportation infrastructure within the vicinity of the Project site. Given that Piedras Road is an existing unpaved roadway, no new road maintenance would be required as a result of the proposed Project. The proposed Project vehicle entrance and exits associated with the proposed day use parking and staging area would not introduce incompatible uses or line-of-sight issues. Additionally, the proposed Project would not result in traffic delays that could substantially increase emergency response times or reduce emergency vehicle access. Therefore, there would be no impact on recreational trails associated with the implementation of the proposed Project.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>38. Bike Trails</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
a) Include the construction or expansion of a bike system or bike lanes?				

**Source(s):** Riverside County General Plan

**Findings of Fact:**

a) **No Impact.** The proposed Project would be limited to the construction of the proposed day use parking and staging area and would not include the construction or expansion of a bike system or bike lanes (refer to Section 36, *Recreational Trails*).

**Mitigation:** No mitigation is required.

**Monitoring:** No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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**TRIBAL CULTURAL RESOURCES** Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

<b>39. Tribal Cultural Resources</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Source(s):** Extended Phase I Cultural Resources Inventory; Assembly Bill 52 Tribal Consultation Correspondence

Assembly Bill (AB) 52, which went into effect on July 1, 2015, established a consultation process with all California Native American tribes and required consideration of Tribal Cultural Resources in the determination of potential environmental impacts. Tribal Cultural Resources are defined as a site feature, place, cultural landscape, sacred place or object, which is of cultural value to a Tribe that is either: 1) on or eligible for the California Historic Register or a local historic register; or 2) treated by the

lead agency, at its discretion, as a traditional cultural resource per Public Resources Code 21074 (a)(1)(A)-(B).

As described in Section 8, *Cultural Resources*, Amec Foster Wheeler submitted a Sacred Lands File request to the NAHC on September 27, 2017, to determine whether their files indicate the presence of cultural sites within or immediately adjacent to the APE. On September 29, 2017, the NAHC responded that the Sacred Lands File records search did identify sites within the APE that may be impacted by the proposed Project. The NAHC provided a list of 37 tribal representatives from 24 Native American tribes to contact regarding the proposed Project. Amec Foster Wheeler sent letters to the 37 tribal representatives on October 27, 2017, to request specific information regarding cultural resources within or near the APE. The 24 tribes contacted during the Native American consultation process include:

- Agua Caliente Band of Cahuilla Indians
- Augustine Band of Cahuilla Mission Indians
- Cabazon Band of Mission Indians
- Cahuilla Band of Mission Indians
- Campo Band of Mission Indians
- Ewiiapaayp Tribal Office
- Jamul Indian Village
- La Jolla Band of Luiseno Indian
- La Posta Band of Mission Indian
- Los Coyotes Band of Mission Indians
- Manzanita Band of Kumeyaay Nation
- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pauma Band of Luiseno Indians-Pauma & Yuima Reservation
- Pechanga Band of Luiseno Indians
- Ramona Band of Cahuilla Mission Indians
- Rincon Band of Mission Indians
- San Pasqual Band of Mission Indians
- Santa Rosa Band of Mission Indians
- Soboba Band of Luiseno Indians
- Sycuan Band of the Kumeyaay Nation
- Sycuan Band of the Kumeyaay Nation
- Torres-Martinez Desert Cahuilla Indians
- Viejas Band of Kumeyaay Indians

Of the 37 tribal representatives contacted, 12 tribal representatives responded to the letter, including the Pechanga Band, Soboba Band, Viejas Band, Augustine Band, La Jolla Band, Manzanita Band, Morongo Band, Ramona Band, Agua Caliente Band, Rincon Band, Santa Rosa Band, and Pauma Band.

The replies made by mail included those from the Pechanga Band, Soboba Band, and the Viejas Band. Viejas Band Resource Manager Ray Teran stated that the Project site is of little cultural significance to the Tribe but requested to be notified of any cultural resources discovered. Joseph Ontiveros of the Soboba Band stated that the project location is in proximity to known sites, is a shared use area that was used in ongoing trade between the tribes, and is considered to be culturally sensitive by the people of Soboba. He asked that Riverside County initiate and continue correspondence with the Tribe, that he receive project information, that the Tribe have the opportunity to monitor any ground disturbing activities during implementation of the proposed Project, that the proper procedures and requests of the Tribe be honored and included a regulatory framework for the treatment of cultural items and human remains. Planning Specialist Tuba Ebru Ozdil of the Pechanga Band stated that the APE is in a highly sensitive area for cultural resources and human remains and asked that a qualified archaeologist and Pechanga Band tribal monitor be present during future earthmoving activities, including tree removal. She also asked to be notified of the entitlement process and to receive all pertinent archaeological reports, resource files, and grading plans. Ms. Ozdil also requested formal government-to-government consultation with Riverside County, the Lead Agency.

The administrative assistant to Joseph Hamilton, Chairperson of the Ramona Band deferred to Environmental Coordinator John Gomez. A voicemail was left with Mr. Gomez the same day. On behalf of the Agua Caliente Band, Patricia Garcia-Plotkin deferred to local tribes. The administrative assistant to Chairperson Bo Mazzetti of the Rincon Band deferred to Cultural Resources Department, who stated that they reply to the letter at a later time. The administrative assistant to Chairperson Steven Estrada of the Santa Rosa Band asked that any follow up questions be emailed to him. An email was sent to Chairperson Estrada on November 15, 2017. On behalf of the Pauma Band, Chris Devers stated via email that they would like copy of cultural report when completed and wanted to confirm the Project Area footprint. Reply was sent on November 20, 2017 confirming the APE footprint and offering report once finalized.

RivCoParks distributed tribal consultation notification letters pursuant to AB 52 on June 9, 2020 and received requests for formal government-to-government consultation from the following tribes:

- Morongo Band of Mission Indians
- Pala Band of Mission Indians
- Pechanga Band of Luiseno Indians
- Rincon Band of Mission Indians
- Soboba Band of Luiseno Indians

RivCoParks parks hosted virtual consultation meetings with these tribes in July and August 2020. The proposed cultural resources mitigation measures (Mitigation Measure CUL-3) and tribal cultural resources mitigation measure (Mitigation Measure TC-1) were revised consistent with input from the Soboba Band of Luiseno Indians.

#### Findings of Fact:

a, b) **Less Than Significant with Mitigation Incorporated.** While the Project site and APE contain no previously recorded tribal cultural resources, the Project site and surrounding vicinity are considered by the local Native American tribes to be highly sensitive areas for tribal sites and resources. No tribal cultural resources were encountered at the Project site during the intensive field survey prepared for the Extended Phase I Cultural Resources Inventory. Potential impacts would be mitigated through the implementation of Mitigation Measures CUL-1 through CUL-6 and TC-1. These mitigation measures would include construction training and would also require both archaeological and Native American monitors to be present during ground disturbing activities, including grading and tree removal. In the unlikely event that previously unknown archaeological resources are discovered during ground-disturbing activities associated with the proposed Project, construction activities would temporarily cease within the vicinity until a qualified archaeologist could evaluate the significance of the resource(s) in consultation with the RivCoParks and an appropriate Native American representative(s). With the implementation of the Mitigation Measures CUL-1 through CUL-6 and TC-1, potential impacts to tribal cultural resources would be less than significant within mitigation incorporated.

#### Mitigation:

**Mitigation Measure TC-1:** At the request of the Soboba Band of Luiseno Indians and Pechanga Band of Luiseno Indians during consultation under AB 52, RivCoParks shall enter into an agreement with the consulting tribe(s) for (a) Native American monitor(s) to provide Luiseno Tribal Monitoring services including observation of all soil disturbance activities (e.g., grading, tree removal, etc.). The frequency of inspections will be based on the rate of excavation, the materials excavated, and the potential

presence and abundance of artifacts and features. In the event that a previously unknown buried archaeological resource or human remains are encountered during grading activities, the standard protocols for evaluation and recovery described in CUL-2 through CUL-6 would be implemented.

Monitoring: Compliance with this mitigation measure would be subject to periodic site inspections by the Riverside County Planning Department.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>UTILITIES AND SERVICE SYSTEMS</b> Would the project:				
<b>40. Water</b>				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, or storm water drainage systems, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Findings of Fact:

a, b) **No Impact.** The proposed Project would not include the construction of permanent restrooms, water fountains, or any other structures that require the use of domestic water. Therefore, the Project would not require new water, wastewater, or drainage systems and would not have any impacts on water supplies.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>41. Sewer</b>				
a) Require or result in the construction of new wastewater treatment facilities, including septic systems, or expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in a determination by the wastewater treatment provider that serves or may service the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Findings of Fact:

a, b) **No Impact.** The proposed Project would not include the construction of permanent restrooms, water fountains, or any other structures that require the use of domestic water. Therefore, the proposed Project would not require new wastewater treatment facilities and would not strain existing systems.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>42. Solid Waste</b>				
a) Generate solid waste in excess of State or Local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Comply with federal, state, and local management and reduction statutes and regulations related to solid wastes including the CIWMP (County Integrated Waste Management Plan)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Findings of Fact:

a, b) **No Impact.** Construction of the proposed Project would be limited to minor grading activities at shallow depths (i.e., maximum cut of 2 feet), necessary to level the Project site. No building demolition or other solid waste generating activities would be required during construction. The proposed Project would provide trash receptacles for Park visitors; however, solid wastes generated at the proposed day use parking and staging area would be minor and would be well within the existing capacity of landfills in the region. For example, Lamb Canyon Landfill, located approximately 21 miles east of the Project site, permits 5,000 tons of solid waste per day (California Department of Resources Recycling and Recovery [CalRecycle] 2018). Therefore, the proposed Project would not have impacts on solid waste generation and complies with regulations around solid waste.

Mitigation: No mitigation is required.

Monitoring: No monitoring is required.

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>43. Utilities</b>				
Would the project impact the following facilities requiring or resulting in the construction of new facilities or the expansion of existing facilities, whereby the construction or relocation would cause significant environmental effects?				
a) Electricity?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Natural gas?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Communications systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Street lighting?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Maintenance of public facilities, including roads?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Other governmental services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Findings of Fact:**

a-d) **No Impact.** The proposed Project would not include structures that would use electricity, natural gas, communication systems, or lighting. Minimal activities would be required to maintain the Project site and Piedras Road.

e) **Less Than Significant.** The proposed day use parking and staging area would trash removal and other minor maintenance activities (e.g., cleaning off picnic tables, etc.). Service would be required intermittently, and mostly often during peak use in the peak Spring and Summer months. However, the impacts of these maintenance would be less than significant. As described in Section 37, *Transportation*, given that Piedras Road is an existing unpaved roadway, no new road maintenance would be required as a result of the proposed Project.

f) **No Impact.** No other government services would be required as a result of the proposed Project and there would be no impact.

**Mitigation:** No mitigation is required.

**Monitoring:** No monitoring is required.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>WILDFIRE</b> If located in or near a State Responsibility Area (SRA), lands classified as very high fire hazard severity zone, or other hazardous fire areas that may be designated by the Fire Chief, would the project:				
<b>44. Wildfire Impacts</b>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Expose people or structures either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The main park entrance and trail access points throughout the parks have signs that state that hunting, fires, and shooting are prohibited within the Park. Similar signage is also placed every 300 feet along Gavilan and Idaleona Road. The Park is also regularly cleared of ladder fuels 100 feet from residences. RivCoParks staff also regularly conduct mowing, weeding, and tree trimming near residences.

**Source(s):** Riverside County General Plan Figure S-11, *Wildfire Susceptibility*

**Findings of Fact:**

a) **No Impact.** As described in Section 37, *Transportation* the proposed Project would not include any change to roadway designs and would not introduce incompatible uses or line-of-sight issues. The proposed Project would not conflict with an emergency response plan and traffic flows would not be interrupted on any roadway such that they would impair or otherwise interfere with emergency access to local roads. Additionally, the proposed Project would not result in traffic delays that could substantially increase emergency response times or reduce emergency vehicle access. Construction vehicles would not park on roadways and, thus, would not create a hazard, interrupt vehicle line-of-sight, or otherwise block emergency access. Therefore, the proposed Project would have no impact.

b) **No Impact.** As previously described, the Project site is immediately surrounded by open space. Rural residences, as well as recreational open space, are located in the vicinity of the Project site, including across Idaleona Road. The Project site is located within the Local Responsibility Area Very High Fire Hazard Severity Zone as identified by the CAL FIRE Fire Hazard Severity Zones Map (Riverside County 2019b). However, no new habitable are included as a part of the proposed Project; therefore, no new people or structures would be exposed to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. The proposed Project would have no impact with respect to the potential uncontrolled spread of a wildfire.

c) **No Impact.** The proposed day use parking and staging area does not propose any new infrastructure that would exacerbate fire risk. Picnic tables and trash receptables would be constructed from concrete. Wood pole fencing and existing on-site boulders would border the perimeter of the Project site. Therefore, there would be no infrastructure that would exacerbate fire risks.

d, e) **No Impact.** The proposed Project is relatively flat and would be leveled as during Project construction. Therefore, the proposed Project would not expose people or structures to flooding or landslides (refer to Section 11, *Geology and Soils* and Section 26, *Hydrology and Water Quality*). As previously described, the proposed Project would not result in increased risk of wildfire. Therefore, the implementation of the proposed Project would result in no impact.



Mitigation: No mitigation is required.

Monitoring: No monitoring is required

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>MANDATORY FINDINGS OF SIGNIFICANCE Does the Project:</b>				
<b>45.</b> Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Findings of Fact:

**Less Than Significant with Mitigation Incorporated.** With the implementation of Mitigation Measures BIO-1 through BIO-7, Mitigation Measures CUL-1 through CUL-6, and Mitigation Measure TC-1 implementation of the proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife populations to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. Therefore, impacts would be less than significant with mitigation incorporated.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>46.</b> Have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects and probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Findings of Fact:

**Less Than Significant with Mitigation Incorporated.** As discussed in this Initial Study, the proposed Project would result in no impacts or less than significant impacts to aesthetics, agriculture and forestry resources, air quality, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, utilities and service systems, and wildfire.

With the implementation of BMPs described in Section 3, *Air Quality* as well as Mitigation Measures BIO-1 through BIO-7, Mitigation Measures CUL-1 through CUL-6, and Mitigation Measure TC-1,

impacts associated with the implementation of the proposed Project would be less than significant. Since these impacts associated with the proposed Project would not be significant when compared to applicable thresholds, none of the impact associated with the proposed Project would make cumulatively considerable, incremental contributions to significant cumulative impacts.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
47. Have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Findings of Fact:

**Less Than Significant.** Construction of the proposed Project would generate temporary criteria pollutant emissions and noise. However, as described in Section 6, *Air Quality*, and Section 26, *Noise*, the impacts to construction workers and surrounding residents would be less than significant. The proposed Project would not cause substantial adverse effects on human beings, either directly or indirectly.

**III. EARLIER ANALYSES**

Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration as per California Code of Regulations Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

Earlier Analyses Used, if any: N/A

Location Where Earlier Analyses, if used, are available for review: N/A

Location: County of Riverside Planning Department  
77588 El Duna Court Unit H  
Palm Desert, CA 92211

#### IV. AUTHORITIES CITED

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