ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE SIERRA BELLA SPECIFIC PLAN CORONA, CALIFORNIA



Prepared by:

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SCH#2004081061

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CITY OF CORONA

ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE SIERRA BELLA SPECIFIC PLAN (August 17, 2005)

A. PROJECT INFORMATION

1. Project Title: Sierra Bella Specific Plan Amendment

2. Lead Agency Name and Address: City of Corona,

400S. Vicentia Avenue, Corona, CA 92882

3. Contact Persons(s) and Phone Jason Moquin, Senior Planner

Numbers: City of Corona Community Development Department

Numbers: 951-736-2268

4. Project Location: The Project is located in the City of Corona at the

eastern terminus of Green River Road at Paseo Grande,

south of the Sierra del Oro community.

INTRODUCTION & PROJECT DESCRIPTION:

An Environmental Impact Report ("EIR") for the Sierra Bella Specific Plan ("SBSP") (State Clearinghouse No. 2004081061) was certified by the City of Corona on August 17, 2005. The EIR analyzed the environmental impacts of subdividing 319 acres inside the SBSP ("Project area") and 2.6 acres outside the project area into 249 residential lots and subsequently constructing 249 hillside residential units (single-family homes). The Project site also included 144 acres of open space, the potential for an additional 20 acres of offsite adjacent open space, and a 2.1 acre offsite neighborhood park. Under the original SBSP, roughly 45% of the Project site was reserved for open space. In connection with the EIR, many technical studies were completed, including biological reports, air quality impact reports, cultural reports, traffic impact analysis, geotechnical reports, an environmental site assessment, fiscal impact analysis, hydrology reports and a noise report.

The SBSP is now being amended (the "Amendment"). The only substantive change to the SBSP implemented by the Amendment is a reduction in the scope and footprint of the Project, as detailed in the revised Tentative Tract Map No. 36541. The Project will still consist of 249 residential units (single-family homes) on the Project site, but the minimum size of residential lots will more closely mirror the adjacent Sierra Del Oro community, and the residential lots will be concentrated into a smaller area. This will significantly increase the open space, as under the Amendment roughly 203 acres (or 62%) of the Project site will be reserved for open space (up from 144 acres or 45% open space under the original SBSP). Additionally, the Amendment's smaller footprint will significantly reduce the grading required and preserve a larger viewshed. Thus, as demonstrated below, the Amendment will reduce the Project's construction related air quality impacts and will also reduce visual impacts.

In connection with the Amendment, many of the previously approved EIR's technical studies have been updated to ensure the Amendment will not result in any environmental impacts not already analyzed in the EIR or that was not known or could have been known in 2005. These updated studies include a

biology report, an air quality report, a geotechnical report, and a traffic study. Additionally, the Addendum also includes a greenhouse gas study and a brush management plan. The Addendum results in no additional or increased significant environmental impacts than those discussed in the 2005 EIR or could have been discussed in 2005. However, the Amendment will reduce most, if not all of the impacts identified in the EIR.

Thus, the Addendum is fully addressed in the EIR, as all impacts of the Addendum are less than those analyzed in the EIR. Although the footprint has been reduced, the use remains unchanged. The Amendment does not result in new or increased significant impacts.

CEQA REQUIREMENTS FOR AN ADDENDUM:

When an EIR has already been certified for a Project, as is the case here, no subsequent EIR shall be prepared for that Project unless the lead agency determines that the Project or circumstances have changed such that major revisions are required to the certified EIR. (CEQA Guidelines, § 15162(a).) When only minor technical changes or additions to the EIR are necessary and none of the conditions described in section 15162 calling for the preparation of a subsequent EIR have occurred, CEQA allows the lead agency to prepare and adopt an addendum. (CEQA Guidelines, § 15164(a).)

Under section 15162, a subsequent EIR is only required when:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous 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 occur with respect to the circumstances under which the project is undertaken which will require major revisions of the negative declaration due to the involvement of any 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 negative declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (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 measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

ANALYSIS:

The applicant proposes to amend the SBSP to decrease the lot size of 237 of the previously approved residential units, located in PA 1, which increases the Project site's open space by reducing its footprint. The Project's residential units will not change in number, but rather will be more concentrated in one area of the Project site.

The following is an analysis of this Amendment and verification that it will not cause environmental impacts such that any of the circumstances provided in State CEQA Guidelines section 15162 are present.

Land Use and Planning

The EIR found that a General Plan amendment was required to increase the maximum allowable density at the Project site, but concluded this impact is less than significant. However, the EIR found that the Project was not fully consistent with all of the City's hillside policies (formally Corona Municipal Code ("CMC"), Ch. 17.62, now CMC § 17.59.130) because of the SBSP's mass grading. The EIR concluded this lack of consistency was significant impact. Despite this significant impact, the EIR did not propose any mitigation measures.

As stated in the EIR, the Project is subject to Land Use Policy 1.23.12 in addition to being subject to Land Use Policies 10.22.2 and 10.22.3 of the Environmental Resources Element. The EIR analyzes the previously approved SBSP's consistency with these policies as follows:

Policy 1.23.12

"Promote, and should the area be annexed to the City require, the development of the SOI foothills south of Coronita for low-density, rural housing that is designed to maintain the area's natural topography, drainage courses, and native landscapes in accordance with this Plan's Natural Resource and Public Safety policies. Housing should be clustered in lot patterns that complement development on adjoining lands in the City of Corona."

Analysis: The project involves low density residential in a rural environment at a density of 0.77 du/ac. The RR II of the City's General Plan is intended for large lot residential subdivisions that reflect estate and/or rural qualities. Of the 321 acres, the project preserves 144 acres of natural open space. The majority of the open space is located within the west and southwest portions of the site with additional clusters of natural open space located along the northerly perimeter of the project site, in the central portion of the project in between the proposed lots, and at the southeast corner of the site. Grading associated with the project affects 175 acres. The lotting design of the subdivision is similar in design to the adjoining residential neighborhood to the north as both areas are encumbered by natural hillsides.

Policy 10.22.2

"Require that project applicants identify and map all slopes greater than 15 percent on parcels within the City's hillside areas, referred to as the "Hillside Management District," in increments of 5 percent (e.g., 15 percent, 20 percent, 25 percent, and so on). Lands within this District shall be subject to administrative review to assure that development is located and designed to reflect its distinct environmental and topographic characteristics consistent with the policies of this Plan, under the provisions of a Hillside Development Ordinance."

Analysis: The project's applicant provided a slope analysis of the project site identifying slope areas greater than 15 percent (see Exhibit 5.1-1). The slope analysis demonstrates that 55 percent of the project area will be graded leaving 45 percent of the site in its natural condition. Thus, the project is consistent with the following hillside development policies prescribed in Corona Municipal Code Chapter 17.62, Hillside Development.

- a) The project preserves visually significant slope banks and ridge lines in their natural state by preserving 45 percent (144 acres) of the project site as natural open space and providing a rural residential low density development that does not exceed one du/ac.
- b) The project minimizes the effects of grading by preserving clusters of natural open space throughout the project site and having manufactured slopes adjoin natural areas to help maintain as much as possible the natural character of the hillsides.
- c) The project's 45 percent preservation of natural open space preserves visually significant rock outcroppings, native plant materials and natural hydrology.
- d) The project encourages variety in housing types by providing two different zoning designations within the project that will accommodate minimum lot sizes of 7,200 and 9,000 square feet. Housing pads are also being terraced to accommodate the contour of the project site with sections of the development separated by open space, both natural and manufactured.
- e) The project's specific plan encourages innovative architecture and landscaping as the Sierra Bella Specific Plan prescribes and sets guidelines for Tuscan/Italianate architecture. The landscape palette for the project includes both natural and ornamental plants with the addition of citrus and avocado orchards.
- f) The project provides for safe circulation of vehicular and pedestrian traffic and for emergency vehicles as the street sections within the project accommodate two lanes of safe travel for vehicles, sidewalks, and space for emergency vehicles, even in areas where parking is allowed on the street. The project also demonstrates a circuitous street design that is compatible with the hillside rather than implementing traditional residential grid and block streets.
- g) The project takes into account unstable slopes to protect project residents from erosion and deterioration. These areas are being graded as manufactured slopes with slope ratios not exceeding 2:1.
- h) The project has prepared a fuel modification plan to help minimize the project's danger from wildfire hazards by establishing special building setback zones from natural areas, restricting plant materials to those that are considered firewise plants and requiring annual thinning of natural vegetation within 100 feet of structures.

Policy 10.22.3

"Require that development in hillside areas with greater than 25 percent slope be clustered on the most gently sloping portions of the site, to the extent feasible, according to the following density limitations of the underlying Land Use Plan designations (Table 5.1-1 below)."

Analysis: The project clusters the development on 175 acres within 25 percent and greater slopes areas. Since 55 percent of the project area will be affected by grading, the project is limited to 80 percent of the density allowed by the RR II (max of one du/ac) designation of the General Plan. The project complies with the restricted density in the General Plan for hillside area as the density of the project is 0.77 du/ac.

The Amendment will not cause any new or increased significant impacts that contradict the above-articulated policies, as the Amendment is consistent with the General Plan's goals and policies. Specifically, unlike the SBSP, the Amendment is consistent with the City's hillside policies, due to the fact that Amendment calls for closer clustering of units and less grading (the Amendment will grade approximately 50 fewer acres than the SBSP analyzed by the previously approved 2005 EIR), thus reducing impacts on "mass grading." Thus, the Amendment does not result in any new or increased significant impacts.

Additionally, the Amendment does not increase the density previously analyzed by the EIR, but only concentrates the development in a smaller area and increases the open space. Thus, just as the previously approved EIR found the SBSP's density and open space to be consistent with the City's General Plan and surrounding uses, the Amendment is also consistent with the General Plan and surrounding uses. Thus, the Amendment does not result in any new or increased significant impacts on land use, and in fact the Amendment will not significantly impact land use and planning.

Population and Housing

The EIR concluded the original Project would not cause a significant impact on population, housing or employment due to the Project's limited share (249 residential units) of the percentage of population growth and limited effect on the jobs/housing ratio. Thus, the EIR did not propose any mitigation measures.

The proposed amendment fits within this analysis because it results in the same number of residences (249) previously analyzed by the 2005 EIR. Thus, the Amendment does not cause any new population or housing growth, and therefore no new or increased significant impacts will result. As concluded in the EIR, even without mitigation, the Amendment will not cause a significant impact on population and housing.

Geology and Soils

The EIR found that the SBSP caused a significant impact on geology and soils. Specifically, the EIR found the extensive grading, buttressing, and other supporting structures required to provide buildable pads for the 249 residential lots would cause a significant impact, even after mitigation.

The EIR proposed the following mitigation measures:

2-1 During grading, all recommendations of PSE relative to slope stability and geotechnical constraints shall be implemented to the satisfaction of the City Engineer. All recommendations

outlined in their investigation shall be implemented, to the extent they are not modified by more recent investigation or specific measures outlined below, in which case, recommendations shall be implemented as modified. The recommendations also include post construction measures, such as irrigation restrictions, which ensure that slope stability is not jeopardized by overwatering and eventual saturation. Post construction measures which are NOT temporary in nature shall be incorporated into the Home Owners Association as permanent requirements of private and HOA slope maintenance.

- 2-2 Prior to issuance of a construction permit, in order to confirm the gross stability of the natural and proposed cut slopes, additional borings shall be conducted at the grading plan review stage, and detailed geologic mapping shall be performed during grading to demonstrate that these conditions are prevalent throughout the site, and to identify localized slopes areas that may require remediation.
- 2-3 During the grading plan review stage, detailed in-grading geological mapping shall be conducted to address slope stability, seepage out of adjacent slopes, impacts to any perched ground water (deep canyon-bottom systems), and other issues such as percolation rates. This analysis shall be presented to the County's Environmental Health Services Department (Department) and City's Public Works Department, and the Applicant shall consult with the Department to ensure that any concerns they have regarding slope stability are appropriately remediated. Such remediation must be identified and addressed prior to issuance of grading permits.
- 2-4 Prior to issuance of a grading permit, a fault zone and setback shall be implemented for the Tin Mine Fault as identified in the PSE reports, unless it can be demonstrated through further investigation during excavation, that this fault is not active by California standards.
- 2-5 All geotechnical reports for the project, including previously submitted reports, future reports and the 40-scale grading plan shall be submitted for review by the City's geological reviewer. All plans shall incorporate notes or other assurances that the measures and construction methods recommended in the project geotechnical reports are implemented. This measure shall be implemented to the satisfaction of the City Public Works Director.
- 2-6 Prior to issuance of a grading permit, the developer shall conduct additional geotechnical evaluations of the Tin Mine Fault and other fault-related features onsite to demonstrate that all proposed residential lots are actually buildable. This additional investigation shall be conducted according to the peer review recommendations by Leighton Consulting, Inc. on the PSE geotechnical studies. This measure shall be implemented to the satisfaction of the City Engineer.

Even after implementation of all these mitigation measures, the EIR concluded the SBSP would still cause a significant impact on geology and soils.

An updated geotechnical study based on the Amendment (specifically, the amended tentative tract map No. 36541) was generated by Advanced Geotechnical Solutions, Inc. on August 21, 2012. This same group generated an amended its original study based on minor changes on October 31, 2012. According to the EIR, the August 21, 2012 study and the October 31, 2012 study, the source of the impacts on geology and soils result is grading and other related activities. The Amendment reduces the overall scale of grading and related activities from the level originally analyzed by previously approved 2005 EIR. In fact, the Amendment calls for approximately 50 fewer acres to be graded than the original SBSP. Thus,

the impacts on geology and soils will be reduced under the Amendment, and therefore the Amendment does not cause new or increased significant impacts on geology and soils.

The Amendment will implement the same mitigation measures proposed by the EIR, and while the impacts will be less under the Amendment than the SBSP, the conclusion will be the same as the EIR's conclusion - the Amendment will cause significant impacts on geology and soils even after mitigation. However, these significant impacts are not new or increased, and are fully covered by the previously approved 2005 EIR.

Hydrology

The EIR found that the SBSP would result in a significant reduction of the 100 year peak flow of several watersheds, due to increased time of concentration resulting from a longer meandering storm drain system in some cases, and reduction in the tributary area in others. The EIR also found that Peak runoff will remain the same for subareas not affected by development or grading. Grading and construction within the site will expose ground surfaces and increase the potential for erosion and the offsite transport of sediment in stormwater runoff. Additionally, the use of heavy equipment, machinery, and other materials during construction could result in adverse water quality impacts if spills come into contact with stormwater and polluted runoff enters downstream receiving waters. The EIR also found conversion of the Project site from an undeveloped condition to residential development would increase the pollutant load to surface runoff flowing through or originating from the site. Finally, the EIR found the SBSP was not in a flood zone and would not result in significant flood impacts.

The EIR proposed the following mitigation measures:

- 3-1 A retarding basin shall be designed for Watershed "J" for the purpose of mitigating the 100-year peak runoff. The other alternative would be to redefine drainage area boundaries or to include a small flow-by to Subareas "K" and "F" to balance the peak discharges. No mitigation measures are necessary for Subarea "D." The existing culvert is surrounded with a depressed area and will provide some peak reduction control.
- 3-2 The retarding basin facilities will be graded to provide sufficient storage capacity to regulate 100-year peak flows.
- 3-3 To prevent the retarding basins from being overtopped by a large storm event, a secondary overflow spillway shall be included in the design and construction of the onsite flood control facilities.
- 3-4 Maintenance access ramps shall be provided for all retarding basins and main outlet structures. Regular maintenance before and during the rainy season (October 15 –April 15) will be implemented, in order to maintain the design capacity of the retarding basins.
- 3-5 The developer shall install inlet structures behind the lots to drain the undeveloped mountain slopes, as shown on the hydrology map in the project hydrology study.
- 3-6 Due to the steep terrain of the proposed development, high water velocities in the storm drain systems are anticipated throughout the project site. Therefore, the developer shall construct the storm drain system of extra thick pipe. The outlet structures shall also be designed to provide embankment protection and erosion protection. Energy dissipater or/and velocity control rings,

and rip-rap will be utilized in order to reduce the water velocity at the outlets, and to protect from scour and erosion.

- 3-7 The developer shall coordinate design and construction around the retarding basin or culvert for the Watershed "F" outfall. This is the entrance to the project, and the embankment of the proposed roadway may fill or partially interfere with these existing facilities.
- 3-8 During final design calculations, a precise soils map will be incorporated into the final hydrology calculations so that reductions in peak flows may be obtained.
- 3-9 Prior to the issuance of a grading permit, the appropriate BMPs shall be implemented during construction to control the discharge of pollutants, and to avoid tracking of sediments to the streets, into storm water conveyance channels. This measure shall be implemented to the satisfaction of the City Planning and Public Works Directors.
- 3-10 Prior to the issuance of a grading permit for each phase, the developer shall prepare an Erosion and Sediment Control Plan (ESCP) to prevent any significant removal and/or downstream deposition of soil from the project site during construction. The ESCP shall contain a provision requiring that all erosion control measures and structures shall be maintained and repaired as needed for the life of the project. Prior to the issuance of a grading permit, the City Public Works Department shall approve the ESCP. At the request of the developer, the City Public Works Department may approve the Storm Water Pollution Prevention Plan (SWPPP) as a substitute for the ESCP as long as it fulfills the intent of this measure to an equivalent degree. The SWPPP or ESCP shall be coordinated with the BMPs outlined in Measure 3-9, to the satisfaction of the City Public Works Department. The ESCP shall include, but is not limited to, the following:
 - a.) Specify the timing of grading and construction to minimize soil exposure to winter rain period experienced in Southern California;
 - b.) The natural vegetation shall be retained to the extent feasible on all areas that will not be disturbed for grading, except areas that must be cleared and revegetated as part of a fuel modification program;
 - c.) All slopes greater than five (5) feet in height shall be evaluated to define the optimum length and steepness to minimize flow velocity and erosion potential. Lateral drainage collection systems shall be incorporated at the base of slopes, when determined appropriate, to transport flows in a controlled, non-erodable channel;
 - d.) Indicate where flows on the site can be diverted from denuded areas and carried in the natural channels on the site:
 - e.) Construct man-made channels to minimize runoff velocities;
 - f.) Disturbed areas shall be vegetated and mulched immediately after final grades have been established;
 - g.) Sediment traps, basins, or barriers (silt fences, hay bales, etc.) shall be established on the property to prevent the release of "first flush" urban pollutants, including sediment, from developed areas, including the emergency access roads. The design and location of these improvements shall be identified in the plan subject to review and approval by the City;
 - h.) Drainage facilities designed to transport flows shall be described and the adequacy of the channel shall be verified by City approval of a detailed drainage analysis;
 - i.) An inspection and maintenance program shall be included to ensure that any erosion, which does occur either on- or off-site as a result of the project, will be corrected through a remediation or restoration program within a time frame specified by the City; and

j.) Confirmed observations by the City of uncontrolled runoff being carried onsite will be grounds for suspension or revocation of any grading or building permit in process, or any discretionary permit subsequently applied for until the problem is resolved to the satisfaction of the City Public Works Department. This will prevent runoff that could contain sediment or urban pollutants from being carried onsite.

The EIR concluded that after these mitigation measures are implemented, the SBSP's impacts on hydrology would be reduced to less than significant levels.

The proposed Amendment is consistent with this analysis. All hydrology impacts identified by the EIR would result from long storm drains, reduction of tributary area, construction/grading activities, and urbanization of previously undeveloped land. The Amendment's concentration of residential units in a smaller area will decrease the length of the required storm drains. The Amendment results in less area graded and developed while increasing open space, reducing impacts on tributary areas and impacts from construction/grading activities. The Amendment's reduced footprint also results in the urbanization of less undeveloped land, and the increased open space will result in less runoff under the Amendment than the SBSP previously analyzed by the EIR. Finally, the Amendment does not impact any watersheds not previously analyzed by the EIR. Thus, no new or increased significant impacts will result from the Amendment.

The Amendment will implement all of the mitigation measures under the EIR. After implementation, the conclusion under the Amendment will be the same as the EIR - all impacts on hydrology will be mitigated to a less than significant level.

Air Quality

Short Term/Construction Impacts

The EIR identified significant short term impacts on air quality. The short term impacts result from construction, while the long term impacts result from the operation of the site. Short term impacts identified in the EIR included fugitive dust and other particulate matter, as well as exhaust emissions generated by earthmoving activities and operation of grading equipment during site preparation.

In connection with the EIR, Michael Brandman Associates completed an Air Quality Impact Analysis in April 2005. The assumptions made by Michael Brandman Associates in generating its analysis for construction emissions were as follows: (1) total site area: 174 acres; (2) daily area to be disturbed: 43.5 acres; (3) number of dwelling units: 250 single-family homes; (4) SCAQMD Rule 403 Compliance; and (5) area to be paved: 12.4 acres. The EIR concluded that before mitigation, the short term emissions produced during construction of the project exceed SCAQMD thresholds for NOx, PM10, ROC and CO.

The EIR proposed several mitigation measures, which were as follows:

- 6-1 Prior to issuance of grading permits, the developer shall submit a Dust Control Plan for review and approval by the City and SCAQMD that will describe the application of standard best management practices to control dust during construction, as outlined in General Plan Policy 10.20.8. Best management practices will include but are not limited to:
 - a) The application of water on disturbed soils and unpaved roadways a minimum of three times per day;

- b) Use of track-out prevention devices at construction site access points, stabilizing construction area exit points;
- c) Covering haul vehicles;
- d) Cover all stockpiles of soil;
- e) Restricting vehicle speeds on unpaved roads to 15 mph;
- f) Replanting disturbed areas as soon as practical, and other measures, as deemed appropriate to the site, to control fugitive dust; and
- g) Provide on-site electrical hook ups for electric hand tools such as saws, drills, and compressors, to eliminate the need for diesel powered electric generators.
- 6-2 During construction of the proposed improvements, the developer shall make arrangements to have a lunch wagon visit the construction site during work breaks, including the lunch break.
- 6-3 Prior to construction, the project proponent will provide a traffic control plan that will describe in detail safe detours around the project construction site and provide temporary traffic control (i.e. flag person) during concrete transport and other construction related truck hauling activities.
- 6-4 During all phases of construction, construction equipment will be properly maintained with all maintenance repairs completed at an offsite location and the engines shall have proper tuning and timing.
- 6-5 During construction, all contractors shall not idle construction equipment on site for more than ten minutes.
- 6-6 During grading activities, construction equipment shall be equipped with diesel particulate filters.
- 6-7 During construction of the proposed improvements, only low volatility paints and coatings as defined in SCAQMD Rule 1113 shall be used. All paints shall be applied using either high volume low pressure (HVLP) spray equipment or by hand application.
- 6-8 Prior to issuance of the first occupancy permit in Phase 1, the developer shall install, participate in the installation of, or make a fair share contribution to install at least 25 park and ride spaces within approximately a half mile of the SR-91 Freeway (primary location would be along Green River Road south of the freeway). These spaces could be provided in conjunction with development of another project in this general area. This measure shall be implemented to the satisfaction of the City Planning Director.

Even with the implementation of the proposed mitigation measures, the EIR found the SBSP's short term impacts remain significant and unavoidable. While the mitigation measures reduce ROC and CO to a less than significant level, the EIR concluded both NOx and PM10 emissions remain in excess of the SCAQMD regional emissions thresholds under the SBSP after mitigation and therefore cause significant impacts.

On September 14, 2012, Michael Brandman Associates performed an updated Construction Air Quality Analysis for the Project based on the changes made by the Amendment. Under the Amendment, the number of acres to be graded are reduced from 182.2 to approximately 107 acres. Grading activities are the main driver of short term air quality impacts, not only from the particulate matter produced by

grading, but also from emissions produced by construction equipment and vehicles. Thus, less grading activity will result in less impacts, but the impacts will remain significant.

The September 14, 2012 study did not identify any short term impacts not already identified in the EIR. In fact, the study found the Amendment will result in less air quality impacts, as the amended Project will not exceed the SCAQMD regional emission significance thresholds for PM10, unlike the original Project. However, the amended Project will still exceed SCAQMD regional emission significance thresholds for NOx. The Amendment will implement all of the mitigation measures proposed in the 2005 EIR. While the Amendment causes significant short term impacts on air quality, no new or increased significant impacts will result.

The following tables demonstrate that the Amendment has no new or increased significant impacts by comparing the emissions under the SBSP and the emissions under the Amendment. Both these tables show the emissions levels after the above-cited mitigation measures have been implemented. Further, these Tables reflect that the Amendment will generally result in reduced overall construction air emissions.

Unmitigated Emissions (Pounds per Day) from Sierra Bella Specific Plan, as Analyzed in the 2005 EIR

Pollution Source	ROC	NOx	CO	PM10
Grading				
Emissions Totals	80.56	602.49	615.08	731.22
Significance Threshold	75	100	550	150
Exceed Threshold?	Yes	Yes	Yes	Yes
Paving				
Emissions Totals	11.69	76.05	78.53	3.13
Significance Threshold	75	100	550	150
Exceed Threshold?	No	No	No	No
Construction 2006				
Emissions Totals	54.85	415.19	406.93	18.70
Significance Threshold	75	100	550	150
Exceed Threshold?	No	Yes	No	No
Construction 2007				
Emissions Totals	106.94	397.70	431.91	17.48
Significance Threshold	75	100	550	150
Exceed Threshold?	Yes	Yes	No	No
Construction 2008				
Emissions Totals	106.76	379.55	442.55	15.87
Significance Threshold	75	100	550	150
Exceed Threshold?	Yes	Yes	No	No

Unmitigated Emissions (Pounds per Day) from the Amendment

Pollution Source	VOC	NOx	CO	PM10
Grading				
Emissions Totals	13.66	118.17	63.25	109.59
Significance Threshold	75	100	550	150
Exceed Threshold?	No	Yes	No	No
Construction/Paving/Coating	16.01	71.49	55.30	6.89
Phase 1 and Overlaps				
Significance Threshold	75	100	550	150
Exceed Threshold?	No	No	No	No
Construction/Paving/Coating	13.92	58.92	52.90	5.87
Phase 2 and Overlaps				
Significance Threshold	75	100	550	150
Exceed Threshold?	No	No	No	No
Construction/Paving/Coating	12.67	47.74	50.66	4.96
Phase 3				
Significance Threshold	75	100	550	150
Exceed Threshold?	No	No	No	No
Maximum Daily Emissions	16.01	118/17	63.25	109.59
Significance Threshold	75	100	550	150
Exceed Threshold?	No	Yes	No	No

Long Term/Operational Impacts

The EIR identified operational impacts resulting from motor vehicle traffic and stationary sources. No mitigation measures were proposed, as the EIR concluded all long term impacts resulting from the SBSP were less than significant.

The September 14, 2012 study did not identify any long term impacts not identified in the EIR. As under the EIR, long term impacts from mobile emissions (motor vehicle traffic) and stationary emissions (use of landscape equipment and the consumption of natural gas, electricity, and consumer products) will result from the Amendment, but they will have a less than significant impact. The September 14, 2012 study concluded the Amendment's long term emissions are expected to be below the SCAQMD regional emissions thresholds. By concentrating the same number of residential units approved in the SBSP into a smaller area, the Amendment reduces the amount of land that will be disturbed while still maintaining the same number of residents previously analyzed by the EIR. Thus, the Amendment will result in a lower level of stationary emissions than previously analyzed by the EIR. The Amendment will also reduce the motor vehicle traffic on the Project site by virtue of its compressed footprint. Thus, the Amendment will not result in any new or increased significant long term impacts on Air Quality.

Traffic and Circulation

The EIR found the original Project would cause significant impacts on local streets, even after mitigation, until proposed improvements for Green River Road at SR-91 are completed. The EIR found the total trip generation resulting from the SBSP would be as follows: 2,770 daily two-way trips, 191 AM Peak Hour trips, and 299 PM Peak Hour trips. The EIR found mitigation will be required for certain impacted intersections to operate at an acceptable level of service (LOS).

To that end, the EIR proposed the following mitigation measures:

5-1 Prior to issuance of building permits, the developer shall pay the following fair share contributions to help fund various identified improvements:

KeyIntersections/Links	Improvement Description	Fair-Share %
	- Install five-phase traffic signal at Tanglewood Dr.	100%
Green River Rd Project	(2008)	
Frontage	- Widen Green River to provide WBL and 2 nd EBT	100%
	(2008).	
Green River Road at	- Install three-phase traffic signal (2008).	100%(28.1%)
SR-91 WB Ramps	- Install SB free-right turn lane (2025).	2.7%
	- Install three-phase traffic signal (2008).	100% (5.5%)
Green River Road at	- Install EB free-right turn lane (2025).	3.5%
SR-91 EB Ramps	- Convert NBR to a shared through-right turn lane	3.5%
	(2025).	
Paseo Grande at Ontario	- Install three-phase traffic signal (2008).	2.8%
Avenue	- Instan three-phase traffic signal (2006).	
Palisades Drive at	- Install three-phase traffic signal (2008).	4.1%
Serfas Club Drive	instant tince phase traine signar (2000).	
Green River Road at	- Install three-phase traffic signal (2008).	10.5%
Montana Ranch	instan tince phase traine signar (2000).	10.570
Green River Rd between		
Serfas Club/Ridgeline	- Install capacity enhancing improvements (2025).	31.7%
Drive East		

The percentages shown in parentheses indicate the fair-share responsibility based on traffic volume at the SR-91/Green River Road Interchange ramps should traffic signals be installed by others prior to completion of the Sierra Bella project. In addition, the westbound queue from installation of a traffic signal at the Project Access/Tanglewood Drive intersection will not block access to San Simeon Drive.

- 5-2 Prior to issuance of the first occupancy permits, the developer shall install interim traffic signals at the SR-91 Freeway ramps at Green River Road. This measure shall be implemented to the satisfaction of the City Public Works Department.
- 5-3 Prior to issuance of building permits, the developer shall pay or provide proof of payment for all applicable TUMF fees through Riverside County. This measure shall be implemented to the satisfaction of the City Public Works Director.
- 5-4 Prior to issuance of the first occupancy permit for each phase, the developer shall install and demonstrate installation of all onsite improvements identified in the project traffic study (LLG 2005 EIR Appendix G).

As mentioned above, the EIR concluded that after mitigation, the SBSP would have significant impacts on local streets until the proposed improvements for Green River Road at the SR-91 Freeway are constructed.

The Amendment is within the analysis of the EIR with regard to transportation issues. On August 7, 2012, Linscott, Law & Greenspan performed an updated traffic study. This August 7, 2012 study found the Amendment will result in the following trip generation: 2,494 daily two-way trips, 188 AM Peak

Hour Trips, and 271 PM Peak Hour trips. The Amendment reduces trip generation across the board compared to the levels of trip generation analyzed under the previously approved EIR. The updated study also found the internal roadway proposed by the Amendment was well within the City's LOS requirements. The Amendment will not increase the number of residents, or result in any other factors that would increase impacts on traffic and circulation that were not previously analyzed by the EIR. Thus, no new or increased significant impacts will result from the Amendment.

Like the 2005 EIR, the August 7, 2012 study concluded that after implementation of its recommended mitigation measures, all the impacted intersections are forecast to operate at an acceptable LOS, consistent with the EIR's analysis. The Amendment will implement all of the mitigation measures recommended by the August 7, 2012 study. Therefore, the significance conclusion under the Amendment remains the same as under the EIR, and the Amendment will not cause new or increased significant impacts on traffic and circulation.

Additionally, all the physical improvements on Green River Road at the SR-91 Freeway contemplated by the 2005 EIR have since been completed. In order to mitigate traffic impacts caused by this intersection, the applicant only needs to perform some re-striping in this area. The Amendment will also implement all of the other mitigation measures proposed in the EIR. The Amendment does not change the EIR's conclusion - the Amendment will create significant traffic impacts on local streets, but only until striping has been completed on the River Road at the SR-91 Freeway.

Biological Resources

The EIR found that the SBSP had potentially significant impacts on sensitive species, nesting birds, MSHCP consistency and vectors.

The EIR proposed the following mitigation measures:

- 4-1 During grading of and construction on the site that involves the Phase 4 area, the developer shall retain a biological monitor to evaluate the wildland interface to minimize impacts to biological resources. The monitor shall be empowered to temporarily halt grading or construction activities in areas where impacts are identified. The monitor shall prepare and file monthly reports and a final report with the City Planning Department upon completion of their monitoring effort.
- 4-2 Prior to completion of construction, fencing shall be installed along the boundaries of the site sufficient to prevent unauthorized access to the Cleveland National Forest lands to the south. This measure shall be implemented to the satisfaction of the City Planning Director in consultation with the NFS District Manager or their designee.
- 4-3 Prior to issuance of grading permits, the developer shall coordinate with the City and County Resource Conservation Agency and complete the HANS process for this site, subject to any conditions imposed by the City and/or County in this regard.
- 4-4 The HOA shall provide information to new residents upon move-in, and to all project residents at least annually, on the dangers associated with the urban-wildland interface, including pet predation and indirect impacts to sensitive species. This measure shall be incorporated into the CC&Rs for the project, to the satisfaction of the City Planning Director.

- 4-5 The HOA shall regularly maintain the onsite detention basins and other drainage control structures that contain standing water to minimize the risk of vector-borne disease or pathogens. This measure shall be incorporated into the CC&Rs for the project, to the satisfaction of the City Planning Director.
- 4-6 Prior to issuance of grading permits, the developer shall obtain necessary Clean Water Act and related permits from USACE, CDFG, and/or the RWQCB, as needed. The developer shall implement any additional requirements of the permits relative to biological species and/or jurisdictional land at a minimum 2:1 ratio if on or offsite land is involved.
- 4-7 Prior to the issuance of building permits, the developer shall submit street lighting plans to the City for review in terms of indirect impact to natural areas. This measure shall be implemented to the satisfaction of the Planning Director. The EIR concluded that after mitigation, any impacts on biological resources would be reduced to a less than significant level.
- 4-8 The HOA shall provide information to new residents upon move-in, and all project residents at least annually, on the need to minimize lighting impacts on adjacent natural areas, especially for those residents living adjacent to such areas. The HOA shall incorporate lighting restrictions into its CC&Rs, subject to the review and approval of the City Planning Director.

The EIR concluded that after mitigation, the SBSP's impacts on biology would be reduced to a less than significant level.

The Amendment significantly reduces the amount of land that would have been developed under the original SBSP analyzed by the EIR, resulting in more open space and therefore preserving more biological resources. Thus, the Amendment will not result in any new or significantly increased impacts on biology.

This conclusion is supported by an updated biological analysis by Helix Environmental Planning, completed on October 30, 2012. This study concludes the Amendment, as detailed in the revised Tentative Tract Map No. 36541, will result in impacts to approximately 130 acres (which includes approximately 7 offsite acres) while preserving approximately 194 acres of habitat. In contrast, the biological study performed by VHBC, Inc. in August of 2004 in support of the original EIR concluded that the SBSP would impact approximately 210 acres while preserving only 109 acres. The October 30, 2012 study concludes that even before mitigation, impacts on vegetation from this level of development is less than significant.

As illustrated by the table below, the 2012 study shows that the Amendment will impact less jurisdictional waters than the previously approved SBSP. Thus, no new or increased impacts on jurisdictional waters will result from the Amendment.

	APPROVED PROJECT IMPACTS	AMENDED PROJECT IMPACTS
Acreage Impacted Under U.S. Army Corps		
of Engineers Jurisdiction		
Mule Fat Scrub	0.02	0.02
Ephemeral Drainage	0.77	0.35
Disturbed Wetland	0.00	0.03
Total Acres Impacted	0.79	0.40

Acreage Impacted Under Ca	lifornia			
Department of Fish and Game Jurisdiction				
Coast Live Oak Woodland	0.44	0.24		
Mule Fat Scrub	0.91	0.67		
Riparian Woodland	0.68	0.03		
Disturbed Wetland	0.03	0.03		
Ephemeral Streambed	0.62	0.26		
Total Acres Impacted	2.68	1.23		

No detailed development plans for PA 2 have been submitted for consideration at this time. When detailed development plans are submitted for the PA 2 property, additional environmental analysis will be undertaken. However, assuming a "worst-case" development scenario for PA 2 which includes access via a logical route, development of 100% of the available acreage in PA2 and associated brush management/fuel modification, total project impacts would be approximately 151 acres of habitat. Potential impacts associated with the "worst-case" development of PA 2 are detailed in a letter dated April 12, 2013 by Helix Environmental Planning, Subject: Sierra Bella – Additional Potential Impacts to Sensitive Vegetation Communities and Jurisdictional Resources (Waters of the U.S. and Waters of the State) Associated with Development of Planning Area 2 (PA2) Under a "Full Development of PA 2 Scenario". The biological study performed by VHBC, Inc. in August of 2004 in support of the original EIR concluded that the SBSP would impact approximately 210 acres. Even a potential "worst –case" development scenario still results in more open space and therefore the preservation of more biological resources. Thus, the Amendment will not result in any new or significantly increased impacts on biology.

Both the previously approved 2005 EIR and the updated October 30, 2012 study identify potential disturbance to nesting birds as a potentially significant impact. Additionally, the EIR identified the loss of foraging habitat for the California gnatcatcher and indirect habitat disturbance or modification during grading and construction activities as a potentially significant impact, and called for additional surveys of other species before development. By contrast, the October 30, 2012 study concluded that no sensitive species have the potential to occur in the Addendum's impact area (including the gnatcatcher) except for the fairy shrimp in an extremely small portion of the project area. As was contemplated by 2005 EIR, the October 30, 2012 study states a fairy shrimp survey of the 0.03 acre ephemeral basin should be conducted to confirm that vernal pool fairy shrimp do not occur on site. Such a requirement has been added to the Addendum as a condition of approval, which reduces any impacts on fairy shrimp to a less than significant level. The October 30, 2012 study did not identify any other potentially significant impacts.

The Amendment will implement all the mitigation measures and/or conditions of approval proposed by the EIR and the October 30, 2012 updated biological report. As concluded in the October 30, 2012 report, after mitigation, the Amendment's impacts on biological resources will be less than significant. This impact conclusion is the same conclusion reached under the previously approved EIR, and therefore no new or increased impacts on biological resources will result.

Mineral Resources

The EIR determined that the SBSP project area was not located in any designated Mineral Resource Zones (MRZs). While development of the site would effectively preclude any future mining activity, no existing mining claims were discovered, although it is possible they exist. Even if they do exist, adequate supplies of mineral resources exist in other portions of Riverside County. Thus, no impacts were determined to result.

The EIR proposed the following mitigation measure for mineral resources:

8-1 Prior to issuance of grading permits, the developer shall ascertain the exact legal status of any mining claims on the Project site, and remediate, remove, or cancel them as appropriate. The developer shall provide the City with documentation as to the final disposition of any mining claims on the site, to the satisfaction of the Planning Director.

After implementation of the proposed mitigation measure, the EIR found the SBSP would not cause significant impacts to mineral resources.

As mentioned above, except for minor and insignificant alternations to the area of City-owned land affected by the Amendment, the proposed Amendment does not affect any property not previously analyzed by the EIR. In fact, the proposed Amendment decreases the overall development footprint. Thus, no new or increased significant impacts on mineral resources will result from the Amendment.

The Amendment will implement the same mitigation measure proposed by the original EIR. As concluded by the EIR, the Amendment will not have a significant impact on mineral resources.

<u>Hazards</u>

The EIR found the only significant impact that would occur with regard to hazards is the significant risk for potential wildland fires. The EIR found a buffer zone would be needed to protect the homes, which has the potential to maintain or increase visual impacts.

The EIR proposed the following mitigation measures:

- 9-1 Prior to the start of grading, the developer shall retain qualified personnel to monitor earthwork in case hazardous materials are discovered. If any contamination is found during grading, the developer shall prepare a Voluntary Work Plan (VWP) in consultation with the State Department of Toxic Substances Control (DTSC) to test areas of suspected contamination (Phase 2 testing) and identify the most appropriate methods of remediation (Phase 3 removal and disposal). VWPs shall be reviewed and approved by DTSC prior to the completion of grading of the site affected by contamination. This measure shall be implemented to the satisfaction of the Planning Director.
- 9-2 Prior to the issuance of grading permits, the developer will coordinate the design and construction planning for the project and roadway over the MWD pipeline. At the discretion of the MWD, the developer shall enter into an agreement with MWD to allow its personnel to monitor grading and construction within 100 feet of the pipeline. This measure shall be implemented to the satisfaction of the City Public Works Director.

Even after mitigation, the EIR concluded that the SBSP will still have significant impacts related to wildland fire hazards.

The proposed Amendment is consistent with this analysis. The Amendment reduces the overall size of the residential development, which accordingly reduces the size of the required buffer zone. On August 6, 2012, FIREWISE 2000, Inc. completed a brush management plan for the Amendment. No additional impacts were identified in this plan that were not already analyzed by the previously approved 2005 EIR. Thus, the Amendment will not result in any new or increased significant impacts on hazards.

The Amendment will implement all mitigation measures proposed in the EIR. The Amendment does not change the EIR's conclusion. Even after mitigation, the Amendment will create a significant impact related to wildland fire hazards. However, this significant impact is not new or increased, and is fully covered by the previously approved 2005 EIR.

<u>Noise</u>

The EIR identified both short term and long term noise impacts. In the short term, construction and grading noise (particularly from earthmoving equipment used in grading) was found to cause temporary significant impacts. While the EIR identified increased long term noise levels from the additional motor vehicle noise and from general human activity, the EIR concluded long term impacts were less than significant.

The EIR proposed the following mitigation measures to ensure that long term impacts will remain at less than significant levels and also mitigate the SBSP's short term impacts:

- 7-1 Prior to completion of the park site, the developer shall prepare a noise study based on the proposed layout of uses/facilities of the park site. The noise study shall demonstrate that park uses/users and adjacent residential units will not be exposed to noise levels that exceed City standards. Possible design alternatives include relocation of various uses, parking lot, etc., and installation of block walls and/or berms where needed. This measure shall be implemented to the satisfaction of the City Planning Director.
- 7-2 Prior to the start of grading, the developer shall prepare and submit a Noise Reduction Plan (NRP) that outlines the location of any temporary noise attenuation fences, prioritized location of equipment staging and storage, and use of current noise suppression technology and equipment for all grading and construction activities within 200 feet of existing residences. This measure shall be implemented to the satisfaction of the City Planning Director.

After implementation of these mitigation measures, the EIR found that the SBSP still caused significant *short term* noise impacts.

The proposed Amendment is consistent with this analysis. The Amendment will decrease short term noise impacts by greatly reducing the amount of grading activity from the level analyzed under the previously approved EIR. The Amendment will not increase long term noise related to motor vehicles or human activity because the Amendment does not increase the number of residential units analyzed under the previously approved EIR. Thus, the Amendment will not result in any new or increased significant noise impacts.

The Amendment will implement all the mitigation measures proposed by the EIR. Thus, the conclusion is the same as the EIR – the Amendment will not cause significant long term noise impacts, but will cause significant *short term* impacts. However, these impacts are not new or increased, and are covered under the previously approved 2005 EIR.

Public Services/Recreation

The EIR concluded the original Project would not cause significant impacts on police service, fire service (except for risk associated with major wildland fire), or school services because 249 residential units will not result in population growth big enough to impact any public utilities or services.

The EIR proposed mitigation measures relating only to wildland fires (the EIR concluded that no other mitigation measures were necessary):

- 11-1 During project occupancy, the Home Owners Association (HOA) shall distribute information to new residents and at least annually to all residents on proper fuel modification, maintenance, and the risks and need for safety in the urban-wildland interface.
- 11-2 Prior to grading, the project will make a fair share contribution to fund any needed improvements to the City's communications equipment as identified by the Fire Chief. Any planned improvements to the City's communications equipment shall be purchased and installed by the developer prior to occupancy. This measure shall be implemented to the satisfaction of the City Fire Chief or his designee.

After mitigation, the EIR concluded the SBSP will have a less than significant impact on fire services.

The proposed amendment fits within this analysis because it results in the same number of residences (249) previously analyzed by the EIR, and the Amendment does not make the Project any more susceptible to the risks associated with a major wildland fire. Thus, no increased demand on any public services would result from the Amendment, and therefore no new or increased significant impacts will result.

The Amendment will implement the same mitigation measures proposed by the EIR. The Amendment does not change the EIR's conclusion – after mitigation, the Amendment will not have a significant impact on public services.

The EIR found that the original Project had no significant impacts on recreation. The City's 3.5 acres of parkland per 1,000 population ratio requires the SBSP provide 2.87 acres of parkland. The EIR found that the SBSP's 2 acres of private parkland combined with 2.1 acres of public parkland exceeded the 2.87 acre requirement. The EIR also found the original Project reserved sufficient area for open space to allow for multi-use trails and the like.

The EIR proposed the following mitigation measures:

- 12-1 To the extent feasible, prior to issuance of a grading permit, the developer shall provide the City with modified Specific Plan details showing how multi-use trails can be incorporated into the Project design. This measure shall be implemented to the satisfaction of the City Parks Director.
- 12-2 Prior to issuance of the first occupancy permit in Phase 2, the developer shall contribute the equivalent of 1.6 acres of offsite parkland to the City to help fund the purchase and development of community parkland and/or youth sports fields in the western portion of the City. This measure shall be implemented to the satisfaction of the City Parks Director.

The EIR concluded after the implementation of these mitigation measures, the proposed Project will have a less than significant impact on recreation.

The Amendment does not change the number of residential units analyzed by the EIR, and therefore does not increase the demand for recreation or the required park acreage under the City's 3.5 per 1,000 population ratio. Because of the Amendment and the Park Development agreement, Mitigation Measures 12-1 and 12-2 prescribed in the 2005 EIR are no longer applicable. Furthermore, the combined public and

private parks will result in 4.2 acres of parkland, which exceeds the City's required acreage (2.87 acres). Pursuant to the Amendment, a 2.71 acre neighborhood public park must be under construction prior to the issuance of the 50th building permit and completed within one year from the date of the 50th building permit was issued. As such a new Mitigation Measure 12-3 is warranted. The Amendment also incorporates a 0.93 acre private park. Additionally, the Amendment increases the amount of natural open space on the Project site, increasing the opportunity for multi-use trails and the like. Thus, the Amendment will not result in any new or increased significant impacts on recreation.

Prior to issuance of the 50th building permit for the property, the 2.71 acre park shall be under construction by the developer. The park shall be completed by the developer and accepted by City no later than one year from the date that the 50th building permit was issued. This measure shall be implemented to the satisfaction of the City Parks Director.

The Amendment will implement all mitigation measures proposed in the EIR. The Amendment does not change the EIR's conclusion – after mitigation, the Amendment will not significantly impact recreation.

Utilities

The EIR concluded the original Project would not cause significant impacts on solid waste services, water services, wastewater services, natural gas services, or electricity services, because 249 residential units will not result in population growth big enough to impact any public utilities or services.

Amendment does not change the EIR's conclusion – and the Amendment will not have a significant impact on utilities.

<u>Aesthetics</u>

The EIR determined that the SBSP would have significant impacts on aesthetics, and specifically, impacts related to views, light and glare. These impacts included damaging scenic resources, downgrading the visual character of the site and its surroundings, and creating a new source of light and/or glare in the area.

The EIR proposed several aesthetics mitigation measures:

- 13-1 Prior to recordation of a final map, the developer shall prepare a street lighting plan for the entire project. The goal of this plan will be to minimize street lighting consistent with a rural hillside community. Street lights may be designed to match a design theme of the project, at the discretion of the City. Lights may be restricted to only those locations needed to maintain safe access (e.g., sharp curves).
- 13-2 Prior to opening of the neighborhood park, the City shall install automatic controls that will limit night lighting of the park to the hours and days determined to be necessary by the Parks and Community Services Director. This schedule shall be published in the local newspaper and provided to the master HOA of the project for distribution to project residents prior to the opening of the park, and at least annually thereafter. This measure shall be implemented to the satisfaction of the City Parks Director.
- 13-3 The Master HOA shall include in its master CC&Rs for the project that no reflective window film can be used on windows within the project.

The EIR concluded that even after mitigation, the SBSP will still result in significant aesthetic impacts.

The Amendment is not only consistent with the EIR's analysis, but the Amendment will actually reduce all the aesthetic impacts covered by the EIR. The Amendment will result in a smaller residential footprint and increase open space by roughly 40%, reducing negative impacts to scenic resources and decreasing the impact of a downgrade in visual character on surrounding area. In fact, the Amendment leaves the Project site's most prominent ridgeline in its natural state while the previously-approved SBSP called for grading and development of this area. Furthermore, the decreased residential lot size and resulting concentration of residential uses in one area of the subject property will decrease light and glare impacts, as street lights and lights from residential uses will be decreased in scope and in some cases, located further from neighboring property.

The Amendment will implement all the mitigation measures proposed by the EIR, and as under the EIR, significant impacts will still result. However, the Amendment will not result in new or increased significant impacts, and all significant impacts are fully covered by the previously approved 2005 EIR.

Cultural Resources

The EIR found that there is no evidence of archaeological resources in the Project site area, nor is the Project site recognized as a location for potential discovery of subsurface paleontological or any other historical and/or cultural resources. Furthermore, the EIR concluded that the SBSP did not affect any significant historical resources, such as buildings or structures. As a result, the EIR found that no mitigation measures were required, and the EIR concluded that the SBSP would have a less than significant impact on cultural resources.

The proposed Amendment is consistent with this analysis. The Amendment's reduced footprint of the Project actually *decreases* any risk (however limited) that cultural resources will be disturbed, resulting in less impacts than under the SBSP. Thus, the Amendment will not result in any new or increased significant impacts on cultural resources. Just as under the EIR, the Amendment will not require mitigation measures in order to have a less than significant impact on cultural resources, and as a result, the Amendment will not result in any new or increased significant impacts on cultural resources

Agricultural Resources

The EIR determined that no farmland or agriculturally-zoned property would be affected by the SBSP, and the Project site does not represent any agricultural resource nor has it ever been in agricultural production. Except for minor and insignificant alternations to the area of City-owned land affected by the Amendment, the proposed Amendment does not affect any property not previously analyzed by the EIR. In fact, the proposed Amendment decreases the overall development footprint. Thus, no new or increased significant impacts on agricultural resources will result from the Amendment.

As mentioned above, except for minor and insignificant alternations to the area of City-owned land affected by the Amendment, the proposed Amendment does not affect any property not previously analyzed by the EIR. In fact, the proposed Amendment decreases the overall development footprint. Thus, no new or increased significant impacts on mineral resources will result from the Amendment. As concluded by the EIR, the Amendment will not have a significant impact on agricultural resources.

Greenhouse Gasses

Limiting greenhouse gas ("GHG") emissions to combat climate change has been a governmental goal since the late 1970s. The regulation of GHGs ramped up in the 1990s – the United Nations Framework convention on Climate Change was signed in 1992, a 1995 meeting in Berlin defined a structure for

further action, the Kyoto Protocol on Global Warming was executed in 1997. Under these agreements, many countries, including the United States, have pledged to lower GHG emissions. Since the 1990s, California's local governmental agencies have been well aware of the importance of monitoring and limiting GHG emissions when approving projects. Thus, while the 2005 EIR may not have a separate section dedicated solely to GHG analysis because the California legislature had not yet enacted A.B. 32 and S.B. 375, pursuant to *Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal. App. 4th 515, 530 the SBSP's GHG impacts were fully analyzed and are covered by the previously approved 2005 EIR.

In fact, all the information necessary to evaluate GHG emissions generated by the original project was available in and analyzed by the EIR via the April 2005 Air Quality Impact Analysis performed by Michael Brandman Associates. In an abundance of caution, on February 18, 2013, Michael Brandman Associates completed a GHG analysis of both the SBSP and the Amendment.

Michael Brandman Associates' February 18, 2013 study found that based on the information analyzed in the EIR, the GHG emissions during construction of the original SBSP would have been a total of 8,807 MTCO_{2e} per year (294 averaged over 30 years). the original SBSP's operational emission would have been 5,174 MTCO_{2e} per year over the life of the Project.

The Amendment will not increase GHG emissions. The February 18, 2013 analysis determined construction of the Amendment will produce total emissions of 8,080 MTCO_{2e} per year (269 averaged over 30 years) and the Amendment's operational emissions will be 3,987 MTCO_{2e} per year over the life of the Project, a significant decrease. Thus, both construction and operation of the Amendment will produce less GHG emissions than the SBSP analyzed under the previously approved 2005 EIR. After factoring in sequestration resulting from newly planted trees (which function as mitigation), the Amendment's operational GHG emission are merely 410 MTCO_{2e} per year, which is well under the recommended 3,000 MTCO_{2e} per year recommended threshold. The Amendment calls for the planting of over 5,000 new trees, but the February 18 2013 GHG analysis concludes only 1,412 new trees are needed to adequately mitigation the Amendment's impacts.

The February 18, 2013 GHG analysis specifically concludes that with mitigation, GHGs generated by the Amended Project (both directly and indirectly) will have a less than significant impact. The recommended mitigation measures are as follows:

- MM GHG-1 The project shall exceed current Title 24 standards by 15 percent or more.
- MM GHG-2 The project shall incorporate the planting of a minimum of 1,412 new trees within the project boundary, as specified by the landscape architect.
- MM GHG-3 The project shall incorporate the use of recycled/grey water for the homeowners' association (HOA) landscaping portion of the site
- MM GHG-4 High efficiency appliances, fixtures, and lighting (at least 15 percent efficiency beyond Title 24) shall be installed on site.
- MM GHG-5 Electrical circuitry shall be provided within garages of all residential units for use by electric vehicles.

The Amendment will implement all of these measures and therefore, just as under the 2005 EIR, the Amendment will not result in an significant impact to GHG emissions.

Finally, the February 18, 2013 analysis concluded that the Amendment does not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases, will not be affected by a reduction in water supply, rise in sea level or increased flooding. Thus, the Amendment will not result in any new or increased significant impacts on GHG emissions.

Mandatory Findings of Significance

The EIR found the following impacts to be significant and unavoidable:

Land Use and Planning - The project is not fully consistent with the City's hillside development standards based on the proposed mass grading and clustering of units.

Geology and Soils - Extensive mass grading and reinforcing techniques in an area with multiple geotechnical constraints to support the number and location of proposed units.

Traffic (Local Conditions) - Several local intersections and roadways will experience significant traffic impacts until all planned improvements are constructed. These include Green River Road at the SR-91 Freeway and between Serfas Club and Ridgeline, and Paseo Grande south of Ontario.

Air Quality (Short term) - Grading produces significant air quality impacts from vehicular and equipment emissions. It also raises health risks from excessive dust during prolonged grading, but not to significant levels.

Noise (**Short term**) - The extensive grading, fuel modification, non-native landscaping, and drainage improvements required for this project, and its proximity to existing homes, will create significant short term noise impacts.

Hazards (**Fire**) - The project will introduce dozens of new homes onto a ridge immediately adjacent to foothills covered with chaparral and sage scrub vegetation, in an area that experiences periodic high winds. Even with the proposed fuel modification plans, the project will experience significant risk from major wildland fires.

Aesthetics (Views) - Due to its design, visibility, amount of grading, fuel modification, non-native landscaping, and drainage improvements required, this project will result in significant degradation of both short- and long term views to local residents, and will create significant new light and glare.

Cumulative Impacts - The project will also make significant contributions to the following cumulatively considerable impacts from future growth: land use, traffic, and aesthetics.

The Amendment will not cause any additional mandatory findings of significance. The significance conclusions under the Amendment are the same as the EIR's conclusion because the Amendment will not cause any new or increased significant impacts. While no new or increased significant impacts will result, the Amendment will result in decreased impacts in many categories.

CONCLUSION:

Accordingly, and based on the findings and information contained in the previous EIR, the analysis above, and the CEQA statute and State CEQA Guidelines, including sections 15164 and 15162, the proposed Amendment to the Sierra Bella Specific Plan as detailed in the revised Tentative Tract Map No. 36541 will not result in any additional effects on any environmental resources located on or near the Project site and the potential environmental effects of the proposed relocation have been adequately addressed in the approved Environmental Impact Report for the Sierra Bella Specific Plan. Therefore, an Addendum to the EIR is appropriate under State CEQA Guidelines section 15164.

No detailed development plans for PA 2 have been submitted for consideration at this time. When detailed development plans are submitted for the PA 2 property, additional environmental analysis will be undertaken.

Attachment A: "Environmental Evaluation for the Sierra Bella Specific Plan Amendment and TTM 36541", prepared by the City of Corona, Community Development Department (March 11, 2013).

Attachment A:

"Environmental Evaluation for the Sierra Bella Specific Plan Amendment and TTM 36541", prepared by the City of Corona, Community Development Department (April 17, 2013).