

2021-2029 HOUSING ELEMENT

INITIAL STUDY/NEGATIVE DECLARATION



Lead Agency:
City of Norco
2870 Clark Avenue,
Norco, CA 92860

August 2021

E | P | D SOLUTIONS, INC.

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ACRONYM LIST

A-1-20	Agricultural – Low Density 20,000 square feet
A-P	Alquist-Priolo Earthquake Fault Zoning Act
AQMP	Air Quality Management Plan
AB	Assembly Bill
BMPs	Best Management Practices
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
dBA	A-weighted decibel
EIR	Environmental Impact Report
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Maps
GHG	Greenhouse Gas
HDO	Housing Development Overlay
I-15	Interstate 15
LHMP	Local Hazard Mitigation Plan
MBTA	Migratory Bird Treaty Act
MSHCP	Multi-Species Habitat Conservation Plan
NAAQS	National Ambient Air Quality Standards
NPDES	National Pollutant Discharge Elimination System
NAHC	Native American Heritage Commission
NOx	Nitrous Oxides
O ₃	Ozone

PM	Particulate Matter
RA	Residential Agricultural
RCFD	Riverside County Fire Department/CalFire
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCS	Sustainable Communities Strategy
SCAQMD	South Coast Air Quality Management District
SCAG	Southern California Association of Governments
SR-91	State Route 91
SP	Specific Plan
SWPPP	Stormwater Pollution Prevention Plan
TPZ	Timberland Production Zone
WRCRWA	Western Riverside County Regional Wastewater Authority

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1 INTRODUCTION

1.1 PURPOSE OF THE INITIAL STUDY

This Initial Study has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.); and
- California Code of Regulations, Title 14, Division 6, Chapter 3 (State CEQA Guidelines, Sections 15000 et seq.) as amended and approved on December 28, 2018.

Pursuant to CEQA, this Initial Study has been prepared to analyze the potential for significant impacts on the environment resulting from implementation of the proposed Housing Element Update described in greater detail in Section 3.0 below. As required by State CEQA Guidelines (“Guidelines”) Section 15063, this Initial Study is a preliminary analysis prepared by the Lead Agency, the City of Norco, in consultation with other jurisdictional agencies, to determine if a Mitigated Negative Declaration or an Environmental Impact Report is required for the project.

This Initial Study informs City of Norco decision-makers, affected agencies, and the public of potentially significant environmental impacts associated with the implementation of the project. A “significant effect” or “significant impact” on the environment means *“a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project”* (Guidelines Section 15382).

Given the Project’s broad scope and level of detail, combined with previous analyses and current information about the site and environs, the State’s intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Public Resources Code Section 21003.1)
- Encourage the applicant to incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (Guidelines Section 15004[b][3])
- Specify mitigation measures for reasonably foreseeable significant environmental effects and commit the City and applicant to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (Guidelines Section 15126.4)

1.2 DOCUMENT ORGANIZATION

This Initial Study includes the following sections:

Section 1. Introduction

Provides information about CEQA and its requirements for environmental review and explains that an Initial Study was prepared by the State of California to evaluate the proposed Project's potential impact to the physical environment, and to determine if an Environmental Impact Report (EIR) is required.

Section 2. Environmental Setting

Provides information about the proposed Project's location.

Section 3. Project Description

Includes a description of the proposed Project's physical features and characteristics.

Section 4. Environmental Checklist

Includes the Environmental Checklist from the CEQA Guidelines and evaluates the proposed Project's potential to result in significant adverse effects to the physical environment and identifies if an EIR is required, and if one is, what environmental topics need to be analyzed in the EIR.

2 ENVIRONMENTAL SETTING

2.1 PROJECT LOCATION

The City of Norco is located in southwestern Riverside County (see Figure 1, *Regional Location* and 2, *Project Vicinity*). The City of Norco is located approximately 45 miles east of downtown Los Angeles, 20 miles west of downtown San Bernardino, and 30 miles northeast of Orange County. Regional access to the City is provided via Interstate 15 (I-15) and State Route 91 (SR-91).

2.2 EXISTING LAND USES

The City of Norco encompasses approximately 9,808 acres (14.5 square miles). City land uses predominately include large residential lots for small-plot agriculture, animal-keeping, a vast network of equestrian trails, and a large amount of parkland. The city does support limited commercial development to support with meeting fiscal needs.

The proposed Housing Element Update is focused on four development sites that are detailed below shown in Figure 3, *RHNA Housing Sites*.

- Site 1 is 8.8-acres located adjacent to Fourth Street and Hamner Avenue. The site is undeveloped and is surrounded by office and business park uses to the north, Hamner Avenue to east, fourth Street to the south and a vacant parcel (Site 2) to the west. See Figure 4, *Site 1 and Site 2*.
- Site 2 is 9.7-acres located adjacent to Fourth Street to the south, Horseless Carriage Drive to the west, and Town and County Drive to the north. The site is undeveloped and is surrounded by office and business park uses to the north and northeast and to the south across Fourth Street, vacant parcels to the east (Site 1), and vacant land within a military facility to the west. See Figure 4, *Site 1 and Site 2*.
- Site 3 is 10.2-acres located adjacent to Third Street to the north and Hamner Avenue to the west. The site is largely undeveloped except for the eastern portion that is used as an RV dealership. The site has commercial and office uses to the north across Third Street, Norco College to the west, a vacant parcel to the south (Site 4) and office commercial uses to the east across Hamner Street. See Figure 5, *Site 3 and Site 4*.
- Site 4 is 8.2-acres located adjacent to Third Street and by Norco College to the north, Hamner Avenue and a flood control channel to the east, and single-family homes to the west and to the south. Most of the site is vacant, with the northeast corner developed with a paved lot for recreational vehicle sales. See Figure 5, *Site 3 and Site 4*.

2.3 SURROUNDING LAND USES

Norco is surrounded by the cities of Corona to the south, Riverside to the east, Jurupa Valley to the north, and Eastvale to the west. These jurisdictions are mostly developed and have very limited agricultural land use, except for the city of Riverside, which supports agricultural land in the southern portion of the city.

The four development sites are surrounded by residential, commercial, office, industrial, and vacant lands.

2.4 EXISTING LAND USE AND ZONING

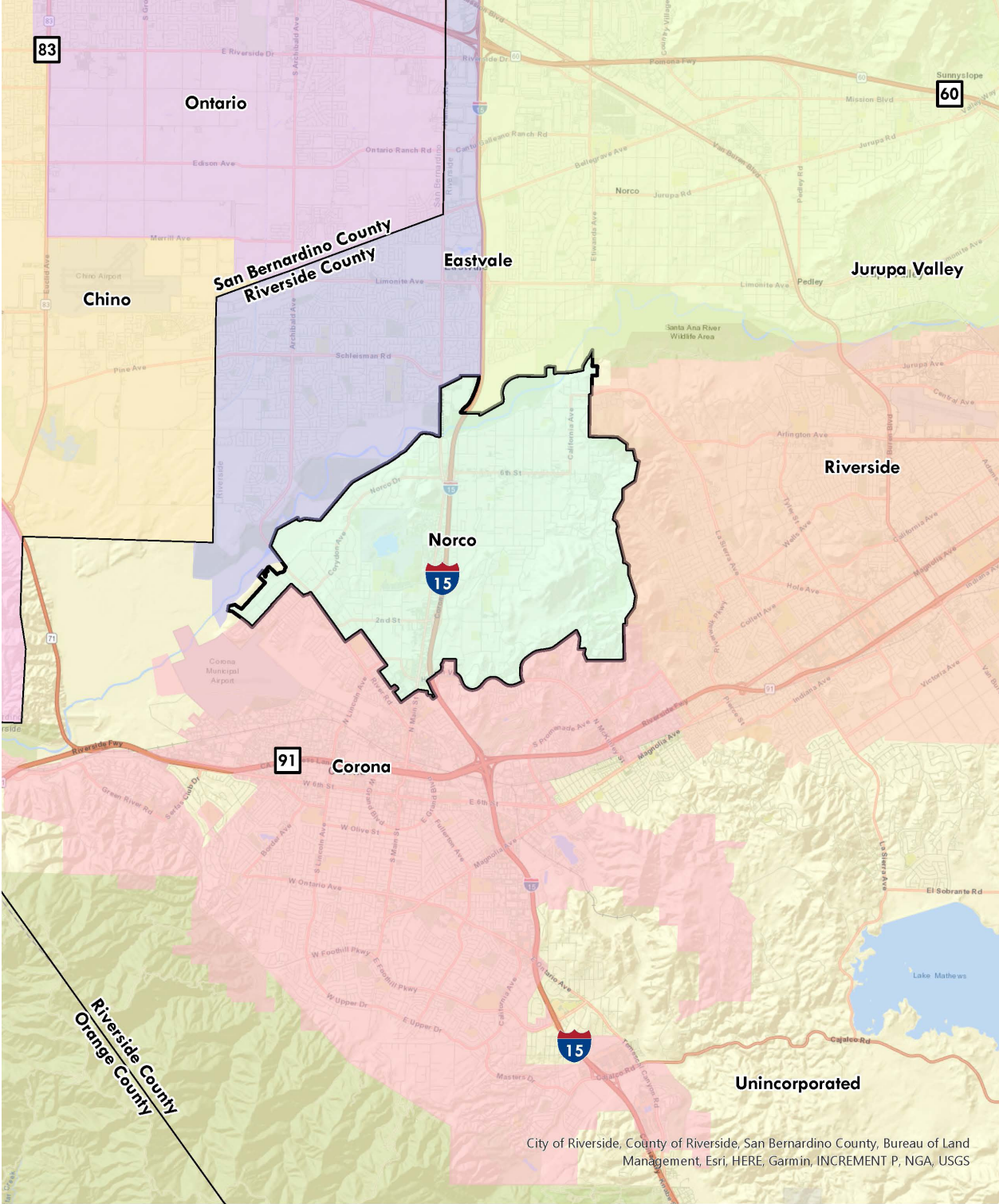
The City supports a variety of land uses, mostly rural in character. The General Plan land use and zoning designations of the four development sites are shown in Figures 4 and 5 and include the following:

- Site 1 has a General Plan designation of CC (Commercial Community) and zoning designation of C-G (Commercial General) with a Housing Development Overlay (HDO).
- Site 2 has a General Plan designation of CC (Commercial Community) and zoning designation of C-G (Commercial General) with a Housing Development Overlay (HDO).
- Site 3 has a General Plan and zoning designation of Specific Plan (SP) with a Housing Development Overlay (HDO).
- Site 4 has a General Plan and zoning designation of Specific Plan (SP) with a Housing Development Overlay (HDO).

Sites 3 and 4 are in the Norco Auto Mall Specific Plan and are designated as Area A (Underlying Zone: Commercial General (C-G)). Area D allows for development of new automobile dealerships and accessory uses. Other uses as permitted by the underlying zone may be allowed upon approval of a Conditional Use Permit (CUP).

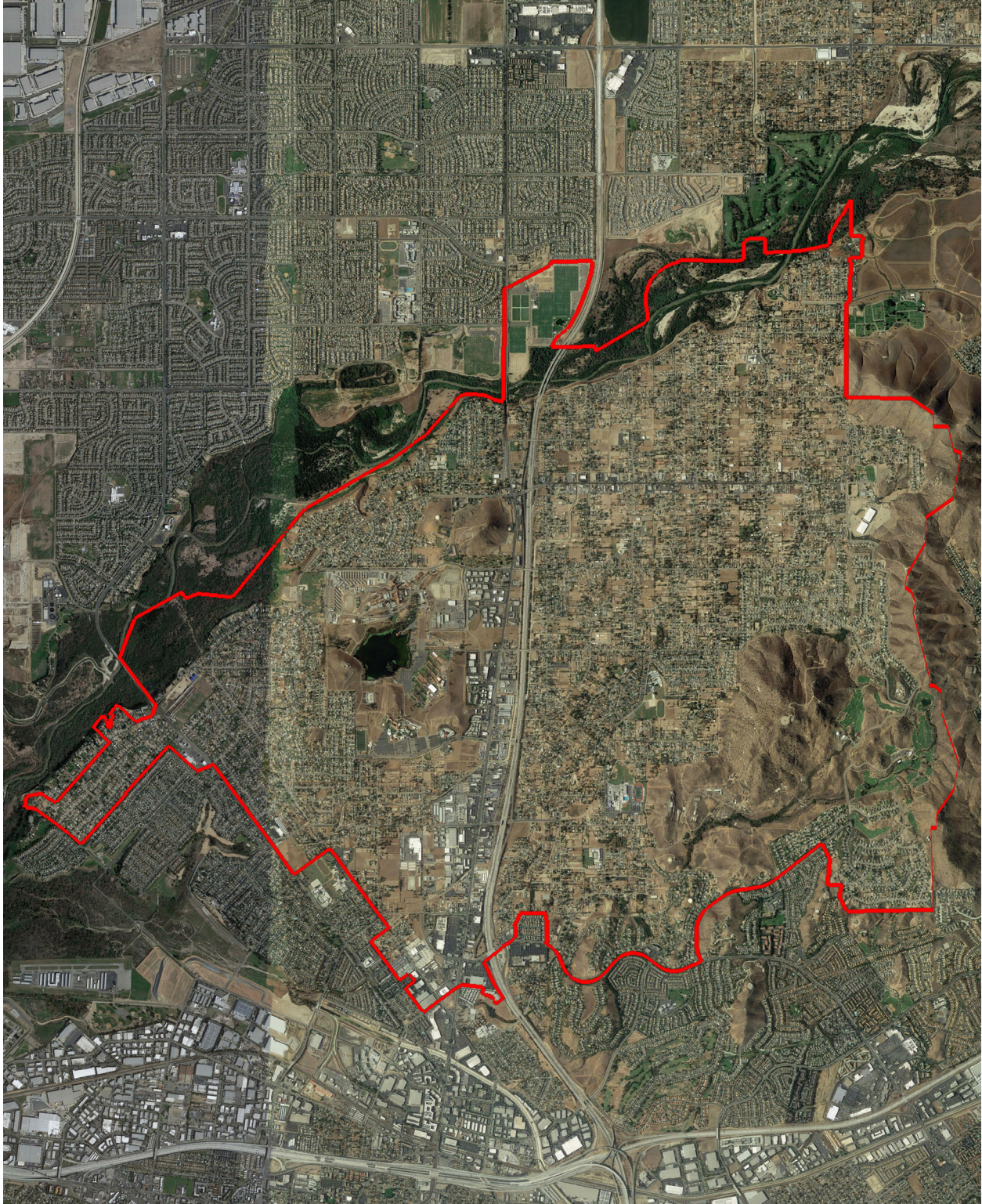
The City's land use and zoning maps provide flexibility through use of several overlays. Overlays provide additional allowances or standards to promote certain types of development or development features. The City's Housing Development Overlay (HDO) is intended to facilitate the development of affordable housing within a mixed-use context while taking into account the community's small plot agricultural/animal-keeping/equestrian lifestyle.

Regional Location



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Aerial Photograph

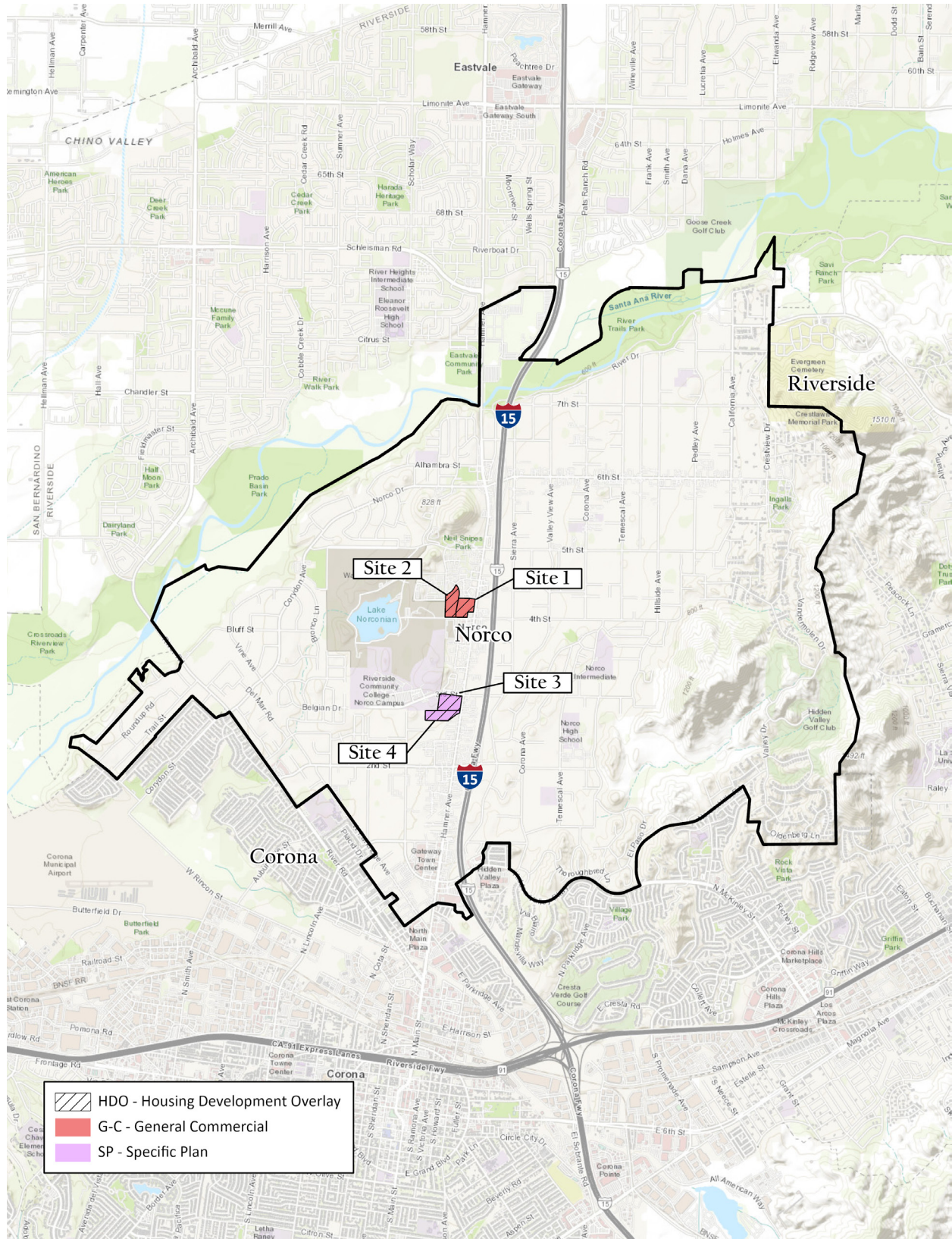


 Project Site



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Housing Element Sites



2021-2029 Norco Housing Element Initial Study

Figure 3

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Legend





- C-G (General Commercial)
- HDO (Housing Development Overlay)
- Site Boundaries
- Parcel Boundaries

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Site 3 & 4



Legend

-  SP (Specific Plan)
-  HDO (Housing Development Overlay)
-  Site Boundaries
-  Parcel Boundaries

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Existing Views of Site 1 & 2

Site 1



Northeast facing views of the southwestern boundary of the Project Site from 4th Street.

Site 2



Southeast facing views of the southwestern boundary of the Project Site from 4th Street.

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Existing Views of Site 3 & 4

Site 3



Southwest facing views of the northern boundary of the Project Site from Third street.

Site 4



Northwest facing views of the northern boundary of the Project Site.

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3 PROJECT DESCRIPTION

3.1 BACKGROUND

In accordance with State Government Code Section 65580, the legislature has declared that the attainment of decent housing and the provision of a suitable living environment to meet the needs of all economic segments of the population are of the highest priority. The legislature also recognizes that to meet the statewide goal, cooperation between government and the private sector is necessary, and that local and State governments have a responsibility to utilize the powers vested in them to facilitate the development and improvement of housing.

The Housing Element is one of the seven mandatory elements of the General Plan. State law requires inclusion of a Housing Element in the General Plan in recognition of the role that land use planning plays in the production of affordable housing. Norco's General Plan consists of the following seven Elements:

- Circulation
- Conservation
- Housing
- Land Use
- Noise
- Open Space
- Safety

Specific requirements for data collection and analysis necessary to prepare the Housing Element are set forth in Government Code Section 65583. The Government Code also requires that each draft of the Housing Element be reviewed by the California Department of Housing and Community Development (HCD) and that the Department's findings be incorporated prior to adoption, or that specified findings be made in response to the Department's comments.

3.2 PROJECT DESCRIPTION

The proposed Project is an update to the Norco General Plan Housing Element. The purpose of the Project is to ensure the City establishes policies, procedures and incentives in its land use planning and redevelopment activities that will result in the maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in Norco. It institutes policies that will guide City decision-making and establishes an action program to implement housing goals through 2029. Sections included in the Housing Element update (HEU) are the following:

- Introduction (Section 1): A background and introduction to the HEU.
- Housing Plan (Section 2): City goals, policies, and actions related to housing.
- Quantified Objectives (Section 3): An estimate of quantified objectives for the number of housing units, broken down by income category, over the 2021-2029 timeframe.
- Housing Needs (Section 4): An analysis of identified housing needs within the city, which includes a breakdown by special needs groups and other demographics.

- **Housing Constraints (Section 5):** Examination of the constraints that could hinder the City’s achievement of its objectives and the resources that are available to assist in the provision of housing.
- **Housing Resources (Section 6):** Summary of the land, financial, and administrative resources available for the development and preservation of housing in Norco.
- **Progress Report (Section 7):** A review of the continued progress in implementation, the effectiveness of the Housing Element, and the appropriateness of the City’s housing goals adopted in the 2014-2021 Housing Element.

State Housing Law requires that each jurisdiction establish the anticipated number of housing units that will be constructed, rehabilitated, and preserved over the planning period, or the quantified objective. The HEU includes Quantified Objectives within Section 3 of the HEU that assume optimum conditions for the production of housing. However, environmental, physical, and market conditions influence the timing, type, and cost of housing production within the community. Also, given the primary goal of Norco is to provide a small-plot agricultural/animal-keeping lifestyle, it is important that new development would conform to maintain this lifestyle.

Consistent with State law, the Norco General Plan HEU Quantified Objectives section provides a plan to accommodate the City’s fair share of affordable housing known as the Regional Housing Needs Allocation (RHNA). The RHNA is allocated to each region of the state by the HCD in consultation with regional council of governments, which is the Southern California Association of Governments (SCAG) for the Southern California region. RHNA is allocated to each jurisdiction by income categories, which are defined by the HCD. The following table presents HCD 2021 income categories applicable to Norco.

Table 3-1: HCD 2021 Income Category

Income Category	Income Limit for a Four-Person Household (Year 2021)
Very Low	\$39,500
Low	\$63,200
Moderate	\$93,000
Above Moderate	over \$93,000

Note: Based on Riverside County area median income of \$77,500 for four-person households in 2021.
Source: Department of Housing and Community Development, 2021

Table 3-2 is an estimate of the HEU Quantified Objectives for the number of housing units, broken down by income category, over the 2021-2029 timeframe. Norco’s RHNA for the 2021-2029 planning period has been determined by the SCAG to be 454 housing units. The previous 2014-2021 5th Cycle Housing Element identified five sites for residential development and the current 6th Cycle Housing Element incorporates two of these sites for residential development (see Figure 1). Since the 5th Cycle 2014-2021 Housing Element, two sites have been developed or approved for development and as such, are not included in the 6th Cycle HEU. In addition, one site was removed from available development sites, due to environmental resource constraints. The two remaining sites remain available for development have been split to create four smaller sites. These parcels

are detailed below. Maps of the sites are provided in Figure 4 and Figure 5. Additionally, site photos are provided in Figure 6 and Figure 7.

Table 3-2: Quantified Housing Element Objectives

	Very Low	Low	Moderate	Above Moderate	Total
Construction (a) (RHNA Allocation)	145	85	82	142	454
Rehabilitation (b)	3	3	–	–	6
Conservation/ Preservation (c)	42	42	41	41	166
Total	190	130	123	183	626

Notes:

1. Construction objectives represent the City’s 2021-2029 RHNA allocation and represent the City’s best efforts to facilitate and encourage the development of a variety of housing types.
2. As the former Redevelopment Agency provided funding for all rehabilitation programs, the City does not have permanent funding to support this objective.
3. Since housing units in Norco do not have expiring affordability covenants in the upcoming planning period (refer to the Assisted Housing At-Risk of Conversion to Market Rate Housing Section), preserved housing reflects existing housing under active covenants.
4. In accordance with State law, the City has determined that approximately 50 percent of its very-low-income units are designed to accommodate the need of extremely-low-income households.

As shown in Table 3-3, the four identified sites would conservatively accommodate 553 units utilizing seven percent of the site for residential, well over the RHNA allocation, at an assumed density of 20 units per acre. This density of development is permitted and encouraged through the application of the HDO zone. Furthermore, the HDO Zone allows the entire site to be used for residential uses at up to 30 dwelling units per acre. At a density of 30 units per acre and with 100 percent residential development, the four sites have capacity to accommodate up to 1,107 total units, with 554 lower income, 156 moderate income, and 344 above moderate-income units.

Table 3-3: Residential Unit Capacity on HDO Zoned Sites

	Site	Acres	Proposed Density	Assumed Residential Percent of Site	Potential Unit Capacity
1	Hamner Avenue and Fourth Street	8.8	20 du/ac	75%	132
2	Town & Country Drive	9.7	20 du/ac	75%	145
3	Hamner Avenue and Third Street	10.2	20 du/ac	75%	153
4	Hamner Avenue	8.2	20 du/ac	75%	123
	Total	36.9			553

Additional information regarding each specific housing site is included below.

Site 1: Hamner Avenue and Fourth Street

Located in the center of the City, west of Interstate 15, Site 1 is comprised of two vacant parcels totaling 8.8 acres. The site is located north of Fourth Street and west of Hamner Avenue, with a business park to the north and vacant parcels to the west. The vicinity of the site contains a mix of commercial, office, and business park uses. In November 2007, a developer purchased the site from Caltrans; however, to date, no formal proposals have been presented to develop the site. The site is zoned Commercial General with a Housing Development Overlay.

This site remains viable for residential development to accommodate the City's 2021-2029 RHNA allocation. Assuming 75 percent of the site will be developed as residential at a density of 20 dwelling units per acre, approximately 132 units can be accommodated on site. Although not including in the sites inventory, this site could be developed 100 percent residential at 30 units per acre; therefore, the capacity for the site could be greater than the conservative estimate provided. Site 1 is entirely vacant and located in the center of the city along a prominent arterial roadway. This site is ideal for the development of affordable housing based on its proximity to employment centers, including City Hall, the Department of Motor Vehicles, a U.S. Post Office, the Department of Social Services, and a number of retail businesses.

Table 3-3 provides detailed information on the parcels within Site 1.

Table 3-4: Site 1 – Hamner Avenue and Fourth Street

Parcel ID No.	1
APN	129-230-036
General Plan Land Use	CC HDO
Zoning	C-G HDO
Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Availability of Dry Utilities	Along frontage
Acres	6.4 ac
Proposed Density ¹	20 du/ac
Potential Unit Capacity	96 du
Income Level	Lower income – 49 du Moderate income – 17 du Above moderate income – 30 du
Parcel ID No.	2
APN	129-230-037
General Plan Land Use	CC HDO
Zoning	C-G HDO
Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Availability of Dry Utilities	Along frontage
Acres	2.4 ac
Proposed Density ¹	20 du/ac
Potential Unit Capacity	36 du

Income Level ^{2,3}	Lower income – 18 du Moderate income – 7 du Above moderate income – 11 du
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Note: Development capacity for the site is assumed to be 75% residential.
¹ HDO Zone allows 100 percent residential uses at up to 30 du/ac. Thus, if 100 percent of Site 1 is used for residential at 30 du/ac, it would accommodate a total of 264 units.
²Housing unit distribution by income level by site is based on the overall income level category percentage breakdown of the City’s RHNA allocation. Percentages applied for each income category include 32 percent very low income and 19 percent low income (for a total of 51 percent lower income), 18 percent moderate income, and 31 percent above moderate income.
³At 100 percent residential and 30 units per acre, Site 1 would accommodate 134 lower income, 48 moderate income, and 82 above moderate-income units.

Site 2: Town & Country Drive

Located in the center of the city, immediately west of Site 1, Site 2 is comprised of two vacant parcels totaling 9.7 acres. The site is north of Fourth Street and south of Town & Country Drive and is surrounded by office and business park uses to the north and south, vacant parcels to the east, and vacant land within a military facility to the west. The site is zoned Commercial General with a Housing Development Overlay. The land has been purchased by a developer but has yet to be developed and remains vacant.

This site remains viable for residential development to accommodate the City’s 2021-2029 RHNA allocation. Approximately 146 units can be developed assuming that 75 percent of the site will be developed as residential units at a minimum density of 20 dwelling units per. Although not including in the sites inventory, this site could be developed 100 percent residential at 30 units per acre; therefore, the capacity for the site could be greater than the conservative estimate provided. Site 2 is entirely vacant and located in the center of the City along a prominent arterial roadway. This site remains ideal for the development of affordable housing based on its proximity to City Hall and other community services.

Table 3-4 provides detailed information on the parcels within Site 2.

Table 3-5: Site 2 – Town & Country Drive

Parcel ID No.	3
APN	129-230-033
General Plan Land Use	CC HDO
Zoning	C-G HDO
Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Availability of Dry Utilities	Along frontage
Acres	4.3 ac
Proposed Density	20 du/ac
Potential Unit Capacity ¹	65 du
Income Level ²	Lower income – 33 du Moderate income – 12 du Above moderate income – 20 du
Parcel ID No.	4
APN	129-230-034

General Plan Land Use	CC HDO
Zoning	C-G HDO
Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Availability of Dry Utilities	Along frontage
Acres	5.4 ac
Proposed Density	20 du/ac
Potential Unit Capacity ¹	81 du
Income Level ^{2,3}	Lower income – 41 du Moderate income – 15 du Above moderate income – 25 du

Note: Development capacity for the site is assumed to be 75% residential.

¹ HDO Zone allows 100 percent residential uses at up to 30 du/ac. Thus, if 100 percent of Site 2 is used for residential at 30 du/ac, it would accommodate a total of 291 units.

² Housing unit distribution by income level by site is based on the overall income level category percentage breakdown of the City's RHNA allocation. Percentages applied for each income category include 32 percent very low income and 19 percent low income (for a total of 51 percent lower income), 18 percent moderate income, and 31 percent above moderate income.

³ At 100 percent residential and 30 units per acre, Site 2 would accommodate 142 lower income, 54 moderate income, and 90 above moderate-income units

Site 3: Hamner Avenue and Third Street

Located in the center of the city, Site 3 is a 10.2-acre site with great potential for mixed-use development. The site is at the southwest corner of Hamner Avenue and Third Street, with commercial and office uses to the east and north, Norco College to the west, and a vacant parcel to the south. Most of the site is vacant, with the eastern edge along Hamner Avenue developed but underutilized, with a paved lot for recreational vehicle sales. The site is zoned Specific Plan with a Housing Development Overlay. The Norco Auto Mall Specific Plan was amended to apply the HDO zone to the two identified parcels.

This site remains viable for residential development to accommodate the City's 2021-2029 RHNA allocation. Assuming that 75 percent of the site will be development of a mix of residential units at proposed density of 20 dwelling units per acre, approximately 152 units can be accommodated at this location. Although not including in the sites inventory, this site could be developed 100 percent residential at 30 units per acre; therefore, the capacity for the site could be greater than the conservative estimate provided. Entitlement of a large mixed-use project, "Norco Valley Square," is ongoing at this site along with Site 4. The proposed project significantly exceeds the target density, with 320 residential units and various commercial uses. The development would include 150 one-bedroom units, 155 two-bedroom units, and 15 three-bedroom units. Restricted affordable units are expected to be included in the project. This site is ideal for the development of affordable housing as it is located in walking distance to Norco College, employment opportunities at numerous area businesses, and restaurants and retailers.

Table 3-5 provides detailed information on the parcels that are indicated as part of Site 3.

Table 3-6: Site 3 – Hamner Avenue and Third Street

Parcel ID No.	5
APN	126-050-002
General Plan Land Use	SP HDO
Zoning	SP-HDO

Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Availability of Dry Utilities	Along frontage
Acres	7.9 ac
Proposed Density	20 du/ac
Potential Unit Capacity ¹	118 du
Income Level ²	Lower income – 60 du Moderate income – 21 du Above moderate income – 37 du
Parcel ID No.	6
APN	129-380-010
General Plan Land Use	SP HDO
Zoning	SP-HDO
Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Acres	2.3 ac
Proposed Density	20 du/ac
Potential Unit Capacity ¹	34 du
Income Level ^{2,3}	Lower income – 17 du Moderate income – 6 du Above moderate income – 11 du

Note: Development capacity for the site is assumed to be 75% residential.
¹ HDO Zone allows 100 percent residential uses at up to 30 du/ac. Thus, if 100 percent of Site 3 is used for residential at 30 du/ac, it would accommodate a total of 306 units.
² Housing unit distribution by income level by site is based on the overall income level category percentage breakdown of the City’s RHNA allocation. Percentages applied for each income category include 32 percent very low income and 19 percent low income (for a total of 51 percent lower income), 18 percent moderate income, and 31 percent above moderate income.
³ At 100 percent residential and 30 units per acre, Site 3 would accommodate 154 lower income, 54 moderate income, and 96 above moderate-income units.

Site 4: Hamner Avenue

Located along the eastern side of Hamner Avenue, Site 4 is an 8.2-acre site with considerable development potential. The site is bordered by Norco College to the north, Hamner Avenue and a flood control channel to the east, and single-family homes to the west and to the south. Most of the site is vacant, with the northeast corner developed but underutilized, with a paved lot for recreational vehicle sales. The site is zoned Specific Plan with a Housing Development Overlay. The Norco Auto Mall Specific Plan also was amended to apply the HDO zone to the parcel.

This site remains viable for residential development to accommodate the City’s 2021-2029 RHNA allocation. Approximately 123 units can be developed assuming that 75 percent of the site will be developed as residential units at a minimum density of 20 dwelling units per acre. Although not including in the sites inventory, this site could be developed 100 percent residential at 30 units per acre; therefore, the capacity for the site could be greater than the conservative estimate provided. Entitlement of a large mixed-use project, “Norco Valley Square,” is ongoing at this site along with Site 3. The proposed project significantly exceeds the target density, with 320 residential units and

various commercial uses. The development would include 150 one-bedroom units, 155 two-bedroom units, and 15 three-bedroom units.

Site 4 is located in the center of the city along a prominent arterial roadway. This site is ideal for the development of affordable housing as it is located in walking distance to Norco College, employment opportunities at numerous local business, and restaurants and retail.

Table 3-6 provides detailed information on the parcels that are indicated as part of Site 4.

Table 3-7: Site 4 – Hamner Avenue

Parcel ID No.	7
APN	126-050-004
General Plan Land Use	SP HDO
Zoning	SP-HDO
Status	Vacant
Availability of Water	Along frontage
Availability of Sewer	Along frontage
Availability of Dry Utilities	Along frontage
Acres	8.2 ac
Proposed Density	20 du/ac
Potential Unit ¹	122 du
Income Level ^{2,3}	Lower income – 62 du Moderate income – 22 du Above moderate income – 38 du

Note: Development capacity for the site is assumed to be 75% residential.

¹ HDO Zone allows 100 percent residential uses at up to 30 du/ac. Thus, if 100 percent of Site 4 is used for residential at 30 du/ac, it would accommodate a total of 246 units

² Housing unit distribution by income level by site is based on the overall income level category percentage breakdown of the City’s RHNA allocation. Percentages applied for each income category include 32 percent very low income and 19 percent low income (for a total of 51 percent lower income), 18 percent moderate income, and 31 percent above moderate income.

³At 100 percent residential and 30 units per acre, Site 4 would accommodate 124 lower income, 44 moderate income, and 76 above moderate-income units

Additionally, several changes to State law have been made since the latest revision of the City’s Housing Element that have been incorporated into various land use policies, zoning provisions, and development regulations. A summary of key changes to policies and programs included in the HEU is provided below.

- The State has passed multiple bills in recent years to remove constraints to the development accessory dwelling units (ADUs) (including Assembly Bill [AB] 587, AB 671, AB 68, and Senate Bill (SB) 13, among others). Therefore, the City will update Section 18.30.46 of the City Zoning Code as needed with State legislation regarding ADUs.
- The Norco Land Use Element and Zoning Code Chapter 18.46 would be amended to be consistent with State law, AB 1397 (2017), to allow residential development of up to 30 dwelling units (without density bonus) per acre by right if 20 percent of the units are affordable to lower income households within the Housing Development Overlay (HDO) zone. The amendment would apply to sites identified in the two previous planning periods and carried over to the 2021-2029 planning period. If any one of the identified sites is not developed in accordance with the development requirements outlined for the HDO zone,

an alternate site or sites must be identified and rezoned to maintain the overall affordable unit capacity.

- AB 101 requires cities to allow a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. The Norco Land Use Element and Zoning Code would be amended to allow be consistent with AB 101. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents’ possessions.
- Under AB 139, local governments may include parking requirements for emergency shelters specifying that adequate parking must be provided for shelter staff, but overall parking requirements for shelters may not exceed the requirements for residential and commercial uses in the same zone. The City’s Zoning Code is not currently consistent with specific parking requirements for emergency shelters identified in AB 139. Therefore, an amendment to the City Zoning Code, Chapter 18.66 would be made.
- AB 2162 requires supportive housing projects of 50 units or fewer to be permitted by right in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The City may choose to allow larger supportive housing projects by right in these zones. The bill also prohibits minimum parking requirements for supportive housing within half mile of a public transit stop. The Norco Zoning Code defines transitional and supportive housing in accordance with State law and allows them subject to the restrictions that apply to other residential dwellings of the same type in the same zone. Chapter 18.64 of the Zoning Code will be revised to be consistent with AB 2162.

The HEU is mostly consistent with the City’s previous Housing Element prepared and certified for the timeframe of 2014 to 2021, which was previously evaluated under CEQA. Aside from the changes identified above, minor changes to the Housing Element have been made to improve readability and remove outdated information, which would be considered negligible for purposes of this analysis.

The City will also update the Norco Municipal Code, Title 18 Zoning, for consistency with HEU, as well as associated map updates to the General Plan map and the zoning map.

3.3 DISCRETIONARY ACTION REQUESTED

The City of Norco will use the information contained in this Initial Study for consideration of approval of the General Plan Housing Element Update, to update the Norco Municipal Code, Title 18 Zoning, for consistency with HEU, as well as associated map updates to the General Plan map and the zoning map.

4 ENVIRONMENTAL CHECKLIST

4.1 BACKGROUND

<p>Project Title: City of Norco General Plan 2021-2029 Housing Element</p>
<p>Lead Agency: City of Norco 2870 Clark Avenue Norco, CA 92860</p>
<p>Lead Agency Contact: Alma Robles, Planning Director (951) 270-5682</p>
<p>Project Location: The Project site is located in Norco, California.</p>
<p>Project Sponsor Contact: N/A</p>
<p>General Plan and Zoning Designation: Norco supports a variety of land use and zoning designations, including agricultural, residential, and commercial.</p> <p>The four development sites have General Plan and zoning designations of commercial or Specific Plan and have a Housing Development Overlay (HDO).</p> <p>Zoning designations within Norco that allow residential development include HS (Hillside Agricultural - Low Density), A-E (Agricultural Estate), A-1-20 (Agricultural - Low Density 20,000 sq. ft.), A-1-40 (Agricultural - Low Density 40,000 sq. ft.), R-1-10 (Residential - Single Family 10,000 sq. ft.). Additionally, the Housing Development Overlay (HDO) zone may include the residential development of single-family homes, multifamily homes, condominiums, townhomes, courtyard housing and other similar forms of housing and shall be developed at a density of 20 to 30 dwelling units per acre.</p>
<p>Project Description: The City of Norco proposes to update the General Plan Housing Element to include plans and policies that will cover the timeframe of 2021-2029 Plan, in compliance with California Government Code Section 65580 et. seq. Implementation of the programs contained in the HEU would accommodate development required to meet the City’s RHNA allocation of 454 residential units, in addition to the City’s other Quantified Objectives for housing. The HEU identifies four vacant and underutilized sites that would accommodate the City’s RHNA allocation.</p>
<p>Surrounding Land Uses and Setting:</p>

Norco is surrounded by the Cities of Corona to the south, Riverside to the east, Jurupa Valley to the north, and Eastvale to the west. These jurisdictions are mostly developed and have very limited agricultural land use, except for the city of Riverside, which supports agricultural land in the southern portion of the city.

The four development sites are surrounded by residential, commercial, office, industrial, and vacant lands.

Other Public Agencies Whose Approval is Required:

City of Norco. No other agency is required to approve the Housing Element update, but it will be reviewed by the HCD for the purpose of determining whether it complies with the requirements of the Housing Element Law.

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

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

4.3 DETERMINATION:

On the basis of this initial evaluation

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a “potentially significant” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier analysis pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Name and Title

Lead Agency

4.4 EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g. the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g. the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including offsite as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
- 4) “Negative Declaration: Potentially Significant Unless Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analysis,” as described in (5) below, may be cross-referenced).
- 5) Earlier analysis 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. Guidelines Section 15063 (c)(3)(d). In this case, a brief discussion should identify the following:
 - (a) Earlier Analysis Used. Identify and state where they are available for review.
 - (b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - (c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning codes). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The analysis of each issue should identify: (a) the significance criteria or threshold used to evaluate each question; and (b) the mitigation measure identified, if any, to reduce the impact to less than significance.

5 ENVIRONMENTAL ANALYSIS

This section provides evidence to substantiate the conclusions in the environmental checklist.

5.1 AESTHETICS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. A scenic vista can be impacted in two ways: a development project can have visual impacts by either directly diminishing the scenic quality of the vista or by blocking the view corridors or “vista” of the scenic resource. Important factors in determining whether a proposed project would block scenic vistas include the project’s proposed height, mass, and location relative to surrounding land uses and travel corridors.

The City’s General Plan does not designate any scenic vistas within the City. However, it does place an emphasis on encouraging land use development to be done in a manner that the City’s scenic vistas are protected.¹ The San Gabriel Mountains and Santa Ana Mountains are to the north and south of Norco. Intermittent long-range views of the mountains can be seen from various locations within the city, including from vehicles and pedestrians traveling on major thoroughfares such as Hamner Avenue, Third Street and Fourth Street. Other natural physical features include Beacon Hill, Norco hills on the east, and Santa Ana River to the east. Bluffs overlook the Santa Ana River. Within developed areas most long-range scenic views are provided along roadway corridors.

¹ General Plan Land Use Element Section 2.6.1.

The HEU does not directly propose any development. However, implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA, which specifies land appropriately zoned to facilitate the production housing to meet the City's RHNA. Development of Sites 1 – 4 with residential uses has the potential to change the visual character of the vacant sites to developed sites, however, intermitted views of the San Gabriel Mountains and Santa Ana Mountains from major thoroughfares such as Hamner Avenue, Third Street and Fourth Street would continue to be available to motorists and pedestrians.

Any future housing or development proposed as a result of the programs contained in the HEU would be required to comply with existing zoning codes and development standards to obtain City permitting approval. Existing Norco Municipal Code requirements and development standards, together with applicable goals and policies of the General Plan Land Use Element, help to protect scenic vistas throughout the City. The existing zoning regulations require development setbacks that would ensure that new development would not encroach into roadway corridors and therefore, scenic views along roadway corridors would not occur with future development pursuant to the HEU. Therefore, the Project would result in no impact on scenic vistas.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no officially designated State scenic highways within the City. The closest Eligible State Scenic Highway according to the California Department of Transportation (Caltrans) is a portion of SR-91, located approximately one mile south of the city. Norco is not visible from the highway. Therefore, the Project would result in no impacts on a scenic resource within a state scenic highway.

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

Less Than Significant Impact. The city is generally a developed urbanized area but with a distinct rural character. The area that runs parallel west along I-15, where the four HEU sites are located, is more commercial in nature than the rest of the city.

As described in Section 2.2, the four HEU sites are vacant, but are surrounded urban developed, as follows:

- Site 1 is 8.8-acres located adjacent to Fourth Street and Hamner Avenue. The site is undeveloped and is surrounded by office and business park uses to the north, Hamner Avenue to east, fourth Street to the south and a vacant parcel (Site 2) to the west. See Figure 4, *Site 1 and Site 2*.
- Site 2 is 9.7-acres located adjacent to Fourth Street to the south Horseless Carriage Drive to the west, and Town and County Drive to the north. The site is undeveloped and is surrounded by office and business park uses to the north and northeast and to the south across Fourth Street, vacant parcels to the east (Site 1), and vacant land within a military facility to the west. See Figure 4, *Site 1 and Site 2*.
- Site 3 is 10.2-acres located adjacent to Third Street to the north and Hamner Avenue to the west. The site is largely undeveloped except for the eastern portion that is used as an RV dealership. The site has commercial and office uses to the north across Third Street, Norco College to the west, a vacant parcel to the south (Site 4) and office commercial uses to the east across Hamner Street. See Figure 5, *Site 1 and Site 2*.

- Site 4 is 8.2-acres located adjacent to Third Street to the north. The site is bordered by Norco College to the north, Hamner Avenue and a flood control channel to the east, and single-family homes to the west and to the south. Most of the site is vacant, with the northeast corner developed with a paved lot for recreational vehicle sales. See Figure 5, *Site 1 and Site 2*.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards, including the development standards contained in the Zoning Code. The four sites would continue to have the existing HDO zone designation and no land use designation changes are proposed.

Additionally, the HEU includes goals and programs to promote and maintain the City's small-plot agricultural and animal-keeping lifestyle, consistent with the existing visual character, while providing locations of higher density to meet the City's RHNA allocation. Compliance with existing Norco Municipal Code requirements and development standards, together with applicable goals and policies of the General Plan Land Use Element, would protect the visual character and quality of Norco. Furthermore, discretionary actions would be subject to environmental review that would evaluate the specific development proposal for its potential to impact visual character and quality.

Due to compliance with applicable zoning and other regulations governing scenic quality, the HUE would not result significant impacts on existing visual character or quality of public views of the site and its surroundings.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

No Impact. The HEU does not directly propose any development. However, implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. Any new development proposed on the four vacant sites would introduce new sources of light from new building security lighting, streetlights, interior lights shining through building windows, and headlights from nighttime vehicular trips generated from new development. As discussed above, although the sites are vacant, they are surrounded by urban uses and major thoroughfares. Further, the City's Municipal Code Section 18.38 provides lighting standards; and Municipal Code Section 18.41.11 requires exterior lights be shielded and arranged to reflect away from adjoining properties. Thus, new lighting would be required to be shielded, diffused or indirect to avoid glare to both on and offsite residents, pedestrians and motorists.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards, including the development standards contained in the Zoning Code.

Therefore, the Project would result on no impact on new sources of substantial light or glare which could adversely affect day or nighttime views.

5.2 AGRICULTURE AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) 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"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The State of California Department of Conservation's (CDOC) Farmland Mapping and Monitoring Program is charged with producing maps for analyzing impacts on the state's agricultural resources.² California's agricultural lands are rated based on soil quality and irrigation status. For CEQA purposes, the following categories qualify as "agricultural land": Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land.³

² Farmland Mapping and Monitoring Program, <http://www.conservation.ca.gov/dlrp/fmmp>.

³ Important Farmland Categories, http://www.conservation.ca.gov/dlrp/fmmp/mccu/Pages/map_categories.aspx; California Public Resources Code Section 21060.1.

The City does not currently include any commercial agricultural land uses. Although agricultural land uses are permitted within Norco, uses are restricted to mostly small recreational and hobby operations. Additionally, land within the city is designated as Urban and Built-Up and Other Land per the CDOC Farmland Mapping and Monitoring Program.

Sites 1 and 2 are identified by the California Department of Conservation Important Farmland Finder as Other Land, and Sites 3 and 4 are identified as Urban and Built-Up land. Therefore, future development of housing on these sites would not result in impacts to prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards, including the development standards contained in the Zoning Code.

Therefore, the Project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The Williamson Act (California Land Conservation Act of 1965) restricts the use of agricultural and open space lands to farming and ranching by enabling local governments to contract with private landowners for indefinite terms in exchange for reduced property tax assessments.

Norco does not include any land that is currently under an active Williamson Act contract. Therefore, the HEU would not result in the cancellation of the contract, and impacts related to a Williamson Act contract would not occur. Additionally, the development sites are zoned for commercial and Specific Plan uses and are not zoned for agricultural use. Therefore, the Project would result in no impact to agricultural zoned areas.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. “Forest land” is defined as “land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.”⁴ “Timberland” is defined as “land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.”⁵ “Timberland Production Zone” (TPZ) is defined as “an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h).”

⁴ California Public Resources Code Section 12220(g).

⁵ California Public Resources Code Section 4526.

The City of Norco does not contain land designated as forest land, timberland, or TPZ. Therefore, the HEU would not result in impacts to forests or timberlands.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. There is no land in the City of Norco that qualifies as forest land as defined in Public Resources Code section 12220(g). Neither the General Plan nor the City's Zoning Code provides designations for forest land. Consequently, the HEU would not result in the loss or conversion of forest land to non-forest use.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. However, as described above the parcels that are identified for future housing do not consist of farmland, are not designated for agricultural uses, and are not adjacent to agricultural uses. The location and detail of other housing projects to meet the City's HEU policies and programs are currently unknown. However, potential impacts would be identified at the time projects are proposed on a project-specific basis through the City's development permitting process. Therefore, implementation of the proposed HEU would not result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

5.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 type="checkbox"/>	<input checked="" type="checkbox"/>

a) Conflict with or obstruct implementation of the applicable air quality plan?

No Impact. The City of Norco is located within the South Coast Air Basin (Basin). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD) and the California Air Resources Board (CARB). Standards for air quality within the Basin are documented in the SCAQMD’s Air Quality Management Plan (AQMP).⁶ The main purpose of an AQMP is to describe air pollution control strategies to be taken by a city, county, or region classified as a nonattainment area in order to bring the area into compliance with federal and State air quality standards. SCAQMD’s 2016 AQMP is based on regional growth forecasts for the Southern California Association of Governments region. Whether the Project would exceed the growth assumptions in the AQMP is, in part, based on projections from local general plans. The HEU would not result in changes to land use or zoning designations and the proposed Project would be consistent with the General Plan. Additionally, the HEU would not conflict with or obstruct implementation of the State Implementation Plan and SCAQMD’s 2016 AQMP because the growth anticipated in the HEU (RHNA allocation) is consistent with SCAG growth projections that were also factored into the AQMP. Therefore, the Project would be consistent with the AQMP regional growth forecasts for the Southern California Association of Governments region.

A project is consistent with the regional AQMP if it does not create new violations of clean air standards, exacerbate any existing violations, or delay a timely attainment of such standards. The HEU is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a separate environmental process to assess potential air quality impacts. Therefore, the HEU would result in no impact.

⁶ South Coast Air Quality Management District (SCAQMD), Final 2016 Air Quality Management Plan (March 2017), available at <https://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

No Impact. The Basin is designated under the California and National Ambient Air Quality Standards (NAAQS) as nonattainment for ozone (O₃), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), nitrogen oxides (NO_x) (California standard only), and lead (Los Angeles County only).

As discussed above, the HEU is a policy document, consisting of a housing program, and its adoption would not, in itself, produce environmental impacts. However, implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. The volume of air quality emissions generated by the new development would depend on the specifics of the units constructed and the types of construction that would occur. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a separate environmental process to assess potential air quality impacts. For specific development projects, issues related to potential long- and short-term emissions and impacts to air quality would be assessed at the time the projects are proposed. Measures that are specific to the development and reduce emissions would then be adopted as necessary. Therefore, the HEU would result in no impact.

c) Expose sensitive receptors to substantial pollutant concentrations?

No Impact. An impact is potentially significant if emission levels exceed the State or Federal ambient air quality standards, thereby exposing sensitive receptors to substantial pollutant concentrations. Sensitive receptors are locations where uses or activities result in increased exposure of persons more sensitive to the unhealthful effects of emissions (such as children and the elderly). City supports residential, school, park and other land uses that include sensitive receptor populations. As described in Section 2.2, in addition to students at Norco College, Site 4 is the only site with nearby residential uses, located to the south, that would be considered sensitive receptors.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards, including the development standards contained in the Zoning Code. Furthermore, discretionary actions, such as approval of a development permit or grading permit, would be subject to environmental review that would evaluate the specific development proposal and the related air quality emission to ensure that the project would not exceed SCAQMD thresholds. Measures that are specific to the development and reduce emissions would then be adopted as necessary. Therefore, the Project would result in no impact.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. The proposed Project would not emit other emissions, such as those generating objectionable odors, that would affect a substantial number of people. The threshold for odor is identified by SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable

number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

As discussed above, the HEU is a policy document, consisting of a housing program, and its adoption would accommodate development required to meet the City's RHNA. The HEU would result in residential uses and does not involve land uses that are typically associated with the creation of objectionable odors (such as rendering plants, landfills, treatment plants, etc.). Therefore, the HEU would result in no impact.

5.4 BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact. The City’s Conservation Element of the Norco General Plan Tables 3.3 to 3.7 provide lists of State and Federally designated special status species that have been observed or have potential habitat within Norco. Preservation of these species depends on the preservation of natural habitats, including any viable inland sage scrub, wetlands and riparian areas (shown in Exhibit 3.8, Wildlife Resources, of the General Plan Conservation Element). Both the size of individual habitat areas and the connectivity between these areas can directly affect the ability of these habitats to support viable populations of sensitive species. Areas within the city that have the potential for special status species include Santa Ana River/Bluffs, Norco Hills, and Lake Norconian Habitat Area.

The four sites identified for future housing development to meet the RHNA needs are infill locations surrounded by existing development and are currently undeveloped and covered with ruderal vegetation. The four housing sites are not located within designated habitat areas as shown in Exhibit 3.8, *Wildlife Resources*, of the General Plan Conservation Element. Therefore, impacts to

sensitive species or habitats are not anticipated. Specific potential effects to biological resources of future residential projects would be assessed at the time the projects are proposed. Specific measures would then be adopted as necessary. The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Furthermore, discretionary actions, such as approval of a development permit or grading permit, would be subject to environmental review that would evaluate the specific development proposal and the related biological setting to ensure that the project would not result in potential biological impacts. Therefore, the HEU would result in a less than significant impact.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The identified RHNA sites are upland sites that do not include riparian habitat or sensitive natural community as identified by the General Plan Conservation Element. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Furthermore, discretionary actions, such as approval of a development permit or grading permit, would be subject to environmental review. The project approval process would ensure that no riparian impacts would occur.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. Norco contains several natural and manmade drainages, most notable the Santa Ana River and Norconian Lake. Additionally, there are small, channelized drainages that traverse southern Norco. According to the California Department of Fish and Wildlife (CDFW) National Wetlands Inventory, there is potential for State and Federally protected wetlands surrounding these waterbodies.

The HEU is a policy document. Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. A concrete lined drainage runs south and adjacent to Sites 1 and 2, which does not contain wetland areas. Sites 3 and 4 also do not contain wetlands. Thus, no impact would occur. Additionally, development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as grading permit that would verify that wetlands do not occur within the site. Therefore, no impacts would occur.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. Future development of identified housing sites could result in vegetation removal, which could result in impacts on wildlife and common bird species protected by the federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code Sections 3503.5, 3511, and 3515.

Wildlife corridors represent areas where wildlife movement is concentrated due to natural or anthropogenic constraints. Local corridors provide access to resources such as food, water, and

shelter. Animals use these corridors, which are often hillsides or riparian areas, to move between different habitats. Regional corridors provide these functions and link two or more large habitat areas. They provide avenues for wildlife dispersal, migration, and contact between otherwise distinct populations.

The four development sites are not located within any designated wildlife corridors or linkages. The sites are surrounded by roadways, developed areas, and a cement lined drainage. The area does not function as a wildlife movement corridor and is not adjacent to a wildlife movement corridor; and therefore, impacts would not occur.

e) Conflict with any local policies or ordinances protecting biological resources?

No Impact. The City of Norco Municipal Code Section 12.12 regulates street trees and states that purpose of the regulation is to assure that a single tree species on any given street will be planted, maintained, trimmed, and replaced if damaged, in a uniform manner to develop a consistent and formal streetscape, providing a canopy effect appropriate to the nature of development adjacent to the street. Additionally, as identified above, the Norco General Plan Conservation Element includes policies to protect natural vegetation and wildlife migratory corridors.

Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. Development proposed as a result of the HEU would be required to comply with local policies and ordinances. Permitting of future development projects would ensure that the City's municipal code requirements related to biological resources are implemented. Therefore, the Project would result in no impact.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. Norco is within the boundaries of the Riverside Conservation Authority's Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP). Portions of the city are overlapped by MSHCP Criteria Areas and Cells (Cities of Riverside and Norco Area Plan-Independent Cell Group). Additionally, Norco is located within areas requiring habitat assessments for the burrowing owl (Section 6.3.2-Additional Survey Needs and Procedures) and selected Group 7 Narrow Endemic Plant Species (Section 6.1.3- Narrow Endemic Plants).

The identified RHNA sites are not within designated MSHCP habitat or criteria cells. The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Therefore, the HEU would not conflict with the provisions of an adopted habitat conservation plan and would result in no impact.

5.5 CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:

- i. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- ii. Is associated with the lives of persons important in our past;
- iii. 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;
- iv. Has yielded, or may be likely to yield, information important in prehistory or history.

The City of Norco contains several designated historic resources and resources of historic age that could be eligible for designation.

Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation and compliance with changing State law. The four sites identified for future housing development are vacant, except for an RV dealership, which is not a historic resource. In addition, the sites are adjacent to roadways and modern commercial, office, and residential development. Therefore, impacts related to historic resources would not occur. In addition, development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a building permit, and undergo an evaluation to ensure historic resources are not involved.

Norco’s Historic Preservation Commission’s responsibilities include recommending to the City Council the designation of cultural resources, including individual properties, archaeological districts, and historic preservation districts. The Commission also maintains a register of cultural resources within the City, which would be reviews prior to approval of development permits. Therefore, the HEU would not result in impacts.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Less Than Significant Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. Ground-disturbing activities of future development have the potential to uncover previously undiscovered archaeological resources depending upon the extent of construction and the depth of excavation. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a project specific evaluation of the potential of construction activities to encounter archeological resources, and measures would be required as part of the construction permit that would reduce impacts. Therefore, the HEU would result in a less than significant impact.

c) Disturb any human remains, including those interred outside of formal cemeteries?

No Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. Based on review of historic aerials, the four identified housing sites have not been previously used as a cemetery. Thus, human remains are not anticipated to be uncovered during project construction.

California Health and Safety Code Section 7050.5, CEQA Section 15064.5, and Public Resources Code Section 5097.98 mandate a process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code Section 7050.5 requires that if human remains are discovered within the Project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and made recommendations concerning the treatment and disposition of the human remains to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Although soil-disturbing activities associated with the proposed Project could result in the discovery of human remains, compliance with existing law would ensure that significant impacts to human remains would not occur. Therefore, the Project would not result in impacts.

5.6 ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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"/>

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

No Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City’s RHNA. The new residential units developed through the Housing Element would generate demand for electricity, natural gas, as well as gasoline for motor vehicle trips. Operational use of energy includes the heating, cooling, and lighting of the residences, water heating, operation of electrical systems and plug-in appliances, and outdoor lighting, and the transport of electricity, natural gas, and water to the residences where they would be consumed. This use of energy is typical for residential development, no additional energy infrastructure would be required to be built to support the HEU, and no operational activities would occur that would result in extraordinary energy consumption.

The proposed project would be required to meet the current Title 24 energy efficiency standards. The City’s administration of the Title 24 requirements includes review of design components and energy conservation measures that occurs during the permitting process, which ensures that all requirements are met. Typical Title 24 measures include insulation; use of energy-efficient heating, ventilation, and air conditioning equipment (HVAC); solar-reflective roofing materials; solar panels. energy-efficient indoor and outdoor lighting systems; reclamation of heat rejection from refrigeration equipment to generate hot water; and incorporation of skylights, etc. In complying with the Title 24 standards, impacts to peak energy usage periods would be minimized, and impacts on statewide and regional energy needs would be reduced. Thus, the development that is identified by the HEU would not use large amounts of energy or fuel in a wasteful manner, and no operational energy impacts would occur.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City’s RHNA. The new development would be required to meet the Calgreen energy efficiency standards in effect during permitting of the project. The City’s administration of the requirements includes review of design components and energy conservation measures during the permitting process, which ensures that all requirements are met. In addition, the project would not conflict with or obstruct opportunities to use renewable energy, such as solar energy. As discussed, the current Title 24 requirements include the use of photovoltaic (PV) solar panels on residential structures to offset their energy demand. As such, the HEU would not conflict with or obstruct a State or Local plan for renewable energy or energy efficiency, and impacts would not occur.

5.7 GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the 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"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?**

No Impact. In 1972, the Alquist-Priolo Special Studies Zones Act was signed into law. In 1994, it was renamed the Alquist-Priolo Earthquake Fault Zoning Act (A-P Act). The primary purpose of the Act is to mitigate the hazard of fault rupture by prohibiting the location of structures for human occupancy across the trace of an active fault. The A-P Act requires the State Geologist (Chief of the California Geology Survey) to delineate “Earthquake Fault Zones” along with faults that are “sufficiently active” and “well-defined.” The boundary of an “Earthquake Fault Zone” is generally about 500 feet from major active faults and 200 to 300 feet from well-defined minor faults. The A-P Act dictates that cities and counties withhold development permits for sites within an Alquist-Priolo Earthquake Fault Zone until geologic investigations demonstrate that the site zones are not threatened by surface displacements from future faulting.

Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA; however, the Norco General Plan Safety Element and the CDOC Earthquakes Zones of Required Investigation Map detail that there are no active or potentially active faults known in the City of Norco. Therefore, impacts related to rupture of a known earthquake fault.

ii. Strong seismic ground shaking?

Less Than Significant Impact. The City does not include any known faults. The closest fault zone, the Chino Fault, is located more than two miles to the southwest of Norco. The proximity of the site to the active faults would result in ground shaking during moderate to severe seismic events. Structures built in the City are required to be built in compliance with the California Building Code (CBC) (California Code of Regulations, Title 24, Part 2) that provides provisions for earthquake safety based on factors including building occupancy type, the types of soils onsite, and the probable strength of ground motion. Compliance with the CBC would require the incorporation of: 1) seismic safety features to minimize the potential for significant effects as a result of earthquakes; 2) proper building footings and foundations; and 3) construction of the building structure so that it would withstand the effects of strong ground shaking. The Norco Building and Safety Division reviews all building plans through building plan check process, issuance of a building permit, and inspection of the building during construction, which would ensure that all required CBC seismic safety measures are incorporated into building design. Therefore, the HEU would result in a less than significant impact.

iii. Seismic-related ground failure, including liquefaction?

No Impact. Soil liquefaction is a phenomenon in which saturated, cohesionless soils layers, located within approximately 50 feet of the ground surface, lose strength due to cyclic pore water pressure generation from seismic shaking or other large cyclic loading. During the loss of stress, the soil acquires "mobility" sufficient to permit both horizontal and vertical movements. Soil properties and soil conditions such as type, age, texture, color, and consistency, along with historical depths to ground water are used to identify, characterize, and correlate liquefaction susceptible soils.

Soils that are most susceptible to liquefaction are clean, loose, saturated, and uniformly graded fine-grained sands that lie below the groundwater table within approximately 50 feet below ground surface. Lateral spreading is a form of seismic ground failure due to liquefaction in a subsurface layer.

According to the Norco General Plan Safety Element, areas of potential liquefaction are identified along the Santa Ana River within northern Norco. The HEU does not include future housing within this area and the identified development sites are not proposed within an area of liquefaction potential. Therefore, no impacts would occur.

iv. Landslides?

Less Than Significant Impact. Landslides and other slope failures are secondary seismic effects that are common during or soon after earthquakes. Areas that are most susceptible to earthquake induced landslides are steep slopes underlain by loose, weak soils, and areas on or adjacent to existing landslide deposits.

The developments sites are relatively flat and are not located next to any hillsides or steep slopes. Also, the Norco General Plan Safety Element identifies that the future development sites are located in areas designated as "Very Low" to "Low" slope instability as a result of ground shaking. Therefore, the project would result in a less than significant impact.

b) Result in soil erosion or the loss of topsoil?

Less Than Significant Impact. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and would be reviewed for impacts to soil erosion.

All construction would be required to comply with Chapter 15.90 of the City's municipal code, City of Norco Grading Requirements, and Chapter 15.70, City of Norco Stormwater/Urban Runoff Management and Discharge Controls. Additionally, all proposed development would be required to comply with and the California Regional Water Quality Control Board (RWQCB) Order No. R8-2010-0033, National Pollutant Discharge Elimination System (NPDES) Permit No. CAS618033 – Construction General Permit requirements. Requirements include installation of Best Management Practices (BMPs), which establishes minimum stormwater management requirements and controls. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the RWQCB regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP would identify potential sources of erosion and sedimentation to prevent loss of topsoil during construction, and to identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags; stabilized construction entrances/exits; hydroseeding, and similar measures. Local and state requirements would prevent soil erosion and the loss of topsoil from occurring as a result of future development. Therefore, the Project would result in a less than significant impact.

- c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction or collapse?**

Less Than Significant Impact. As stated above, sites identified for future development are in areas designated as “Very Low” to “Low” slope instability and outside of liquefaction hazard zone. As described previously, development within the City would be required to adhere with the CBC, which would be verified by the City through the construction permitting process. Therefore, the HEU would result in a less than significant impact.

- d) Be located on expansive soil, as defined in in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?**

Less Than Significant Impact. Expansive soils contain certain types of clay minerals that shrink or swell as the moisture content changes; the shrinking or swelling can shift, crack, or break structures built on such soils. Arid or semiarid areas with seasonal changes of soil moisture experience, such as southern California, have a higher potential of expansive soils than areas with higher rainfall and more constant soil moisture.

There is potential for expansive soils to exist within sites identified for future development. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit. As described previously, development within the City would be required to adhere with the CBC, which would be verified by the City through the construction permitting process. Adherence with the CBC would reduce potential impacts to a less than significant impact.

- e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No Impact. The residential units that would be developed pursuant to the HEU would be served by the City sewer utilities and would not include the use of septic tanks or alternative wastewater disposal systems. Therefore, the HEU would result in no impact.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. Ground-disturbing activities of future development have the potential to uncover previously undiscovered paleontological resources depending upon the extent of construction and the depth of excavation. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a project specific evaluation of the potential of construction activities to encounter paleontological resources, and measures would be required as part of the construction permit, if necessary, that would reduce impacts. Therefore, the HEU would result in a less than significant impact.

5.8 GREENHOUSE GAS EMISSIONS

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

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

Less Than Significant Impact. The analysis methodologies from SCAQMD are used in evaluating potential impacts related to greenhouse gas (GHG) from implementation of the proposed project. SCAQMD does not have approved thresholds; however, the agency does have draft thresholds that provide a tiered approach to evaluate GHG impacts, which include:

- Tier 1: determine whether or not the project qualifies for any applicable exemption under CEQA;
- Tier 2: determine whether the project is consistent with a greenhouse gas reduction plan, which would mean that it does not have significant greenhouse gas emissions; and
- Tier 3: determine if the project would be below screening values; if a project’s GHG emissions are under one of the following screening thresholds, then the project is less than significant:
 - All land use types: 3,000 MTCO₂e per year
 - Residential: 3,500 MTCO₂e per year
 - Commercial: 1,400 MTCO₂e per year
 - Mixed use: 3,000 MTCO₂e per year

In addition, SCAQMD methodology for determining GHG emissions from a project’s construction is to average those emissions over a 30-year span and then to add them to the project’s operational emissions to determine if the project would exceed the screening values listed above. To determine whether the project is significant, the City of Riverside uses the conservative SCAQMD Tier 3 threshold of 3,000 MTCO₂e per year for all land use types.

Implementation of the programs contained in the HEU would accommodate development required to meet the City’s RHNA allocation of 454 housing units. This additional housing would result in direct and indirect GHG emissions, the volume of which would depend on the specifics of the units constructed. Direct emissions include consumption of natural gas, heating and cooling of buildings, landscaping activities and other equipment used directly by land uses. Indirect emissions include the consumption of fossil fuels for vehicle trips, electricity generation, water usage, and solid waste disposal. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action and would undergo a project specific environmental review to assess potential greenhouse gas impacts. The four development sites

identified for future development include infill locations adjacent to a mix of development, that include residential, commercial, school, and office uses. The proximity of these various community uses would reduce vehicle miles traveled and the related operational greenhouse gases would be minimized. Additionally, future development would be required to comply with Clean Energy and Pollution Reduction Act of 2015 (SB 350), AB 1007 (Pavley 2007), Title 24 Energy Efficiency Standards, and the California Green Building Standards, and the City would enforce local energy policies to encourage energy-efficient design through the development permitting process. Therefore, the HEU would result in a less than significant impact.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. The City of Norco is included within the Western Riverside Council of Governments (WRCOG) Subregional Climate Action Plan (CAP) planning area. The CAP is a blueprint that serves as a beginning point to establish, implement, and continuously refine a subregional sustainability plan for jurisdictions within WRCOG. The framework consists of six core components: Economic Development, Education, Health, Transportation, Water and Wastewater, and Energy and the Environment. Measures included as part of the CAP strategy includes implementing bicycle infrastructure where feasible into residential and mixed-use development, implementing California Building Energy Efficiency Standards (Title 24, Part 6), and encouraging mixed use development.

Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. The new development would be required to meet the Calgreen energy efficiency standards in effect during permitting of the project, install bicycle infrastructure, and other measures that would reduce GHG emissions. The City's administration of the requirements includes review of design components and energy conservation measures during the permitting process, which ensures that all requirements of the CAP are met for future development projects. Therefore, the HEU would result in no impact.

5.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard 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"/>

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A hazardous material is defined as any material that, due to its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or environment. Hazardous materials include, but are not limited to, hazardous substances, hazardous wastes, and any material that a business or the local implementing agency has a reasonable basis for believing would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

The Norco General Plan Safety Element includes Goal 2.8, Hazardous Material Management Goal, and Policy 2.8.1, Hazardous Material Management Policy. The purpose of this goal and policy are to protect life and property from adverse risk from the transporting, storing, treating, and disposing of hazardous materials and waste materials within the city. The City enforces various actions within this policy to ensure the operation of businesses and individual involved in the use of hazardous materials does not pose an environmental or health risk on the public.

Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA allocation of 454 housing units. Future construction activities could involve transport, use, and disposal of hazardous materials such as paints, solvents, oils, grease, and caulking. In addition, hazardous materials would be needed for fueling and servicing construction equipment on the site. These types of materials are not acutely hazardous, and all storage, handling, use, and disposal of these materials are regulated by federal and state regulations that are implemented by the City during building permitting for construction activities.

In addition, operation of the new residences would involve routinely using hazardous materials including solvents, cleaning agents, paints, pesticides, batteries, fertilizers, and aerosol cans. These types of materials are not acutely hazardous and would only be used and stored in limited quantities. The normal routine use of these hazardous materials products pursuant to existing regulations would not result in a significant hazard to people or the environment in the vicinity of the project. Therefore, impacts would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA allocation of 454 housing units. Future construction of the new housing units could involve the routine use, storage, transport, and disposal of hazardous materials. Compliance with applicable regulations during construction activities would not pose health risks or result in significant impacts. To avoid an impact related to an accidental release, the use of best management practices (BMPs) during construction are implemented as part of a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollution Discharge Elimination System General Construction Permit is implemented by the City through the permitting process. Implementation of an SWPPP would reduce potential adverse effects to workers, the public, and the environment to a less than significant level.

Operation of residences involve use and storage of common hazardous materials such as paints, solvents, cleaning products, fuels, lubricants, adhesives, sealers, and pesticides/herbicides. These types of hazardous materials are regulated by existing laws that have been implemented to reduce risks related to the use of these substances. Normal routine use of typical residential products pursuant to existing regulations would not result in a significant hazard to the environment, residents, or workers in the vicinity of the project.

c) Emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. The HEU is a policy document that would provide accommodation to meet the City's RHNA allocation of 454 housing units. The John F. Kennedy Middle College High School, a high school facility on the Norco College Campus, is located directly northwest across Third Street from development sites 3 and 4, and is 0.8-mile southwest of sites 1 and 2. As described above, construction and operation of residential uses would involve the use, storage, and disposal of small amounts of hazardous materials. These hazardous materials would be limited and used and disposed of in compliance with federal, state, and local regulations, which would reduce the potential of accidental release into the environment near the schools. In addition, residential uses do not emit hazardous emissions. Therefore, the HEU would result in a less than significant impact.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. The hazardous waste facilities identified by the Department of Toxic Substances Control (DTSC) EnviroStor Database pursuant to Government Code Section 65962.5 includes one facility within Norco.⁷ The facility is located near Norco Hills and is not near one of the four sites identified for future housing development. The four development sites are not within or near facilities or sites identified on the California Department of Toxic Substances Control EnviroStor Database. Therefore, the Project would result in no impact.

e) For a project within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. The nearest airport is the Corona Municipal Airport, which has an airport land use compatibility area that overlaps the western portion of Norco. The RHNA sites are not within the compatibility zone and are not within two miles of an airport. The sites nearest to airport are Sites 3 and 4 and are approximately 2.5 miles to the southwest. Other development facilitated by the HEU would be evaluated at the time of proposal and would be subject to CEQA, which would include review of potential safety hazards related to proximity to an airport. Therefore, the Project would result in no impact.

f) Impair implementation of an adopted emergency response plan or emergency evacuation plan?

No Impact. The City's Safety Element, as contained within the City of Norco General Plan, includes policies and procedures to be administered in the event of a disaster.⁸ The Safety Plan seeks interdepartmental and inter-jurisdictional coordination and collaboration to be prepared for, respond to and recover from every day and disaster emergencies. The City has adopted a Local Hazard Mitigation Plan (LHMP) prepared by the Norco Fire Department in March 2017.⁹

Implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. All development in the City is required to ensure emergency access in accordance with Section 503 of the California Fire Code (Title 24, California Code of Regulations, Part 9), which would be verified through the City's permitting process, as incorporated into development permits. Thus, impacts related to an emergency response or evacuation plan would not occur.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. According to the CalFire Fire Hazard Severity Zone Map for Western Riverside County¹⁰ and the Fire Hazards Map in the City's Safety Element¹¹, Norco contains several fire hazard zones. Fire hazard zones are located to the east, within and surrounding the hillside, on Beacon Hill, and a moderate fire hazard zone surrounds the Santa Ana River.

The four RHNA sites are not located within the identified wildfire hazard zones. The four development sites are vacant and are surrounded by roadways and developed areas. The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing

⁷ Available at <https://www.envirostor.dtsc.ca.gov/public/>. Accessed on July 15, 2021.

⁸ General Plan Safety Element Section 2.

⁹ Available at <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=24754>.

¹⁰ Available at <https://osfm.fire.ca.gov/media/5919/norco.pdf>.

¹¹ General Plan Safety Element Section 2.1.2 and Fire Hazards Map at page 9.

development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Furthermore, discretionary actions, such as approval of a development permit or grading permit, would be subject to environmental review that would evaluate the specific development proposal and any related potential for wildfire impacts. Therefore, the HEU would not result in a significant impact.

5.10 HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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 checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. Implementation of the programs contained in the HEU would accommodate development required to meet the City’s RHNA. Future development would include construction activities such as clearing, grading, paving, and building construction. These activities could result in the generation of water quality pollutants that could violate water quality or waste discharge standards.

All construction would be required to comply with Chapter 15.90 of the City’s Municipal Code, City of Norco Grading Requirements, and Chapter 15.70, City of Norco Stormwater/Urban Runoff Management and Discharge Controls. Additionally, all proposed development would be required to comply with and the California Regional Water Quality Control Board (RWQCB) Order No. R8-2010-0033, NPDES Permit No. CAS618033 – Construction General Permit requirements. Requirements include installation of Best Management Practices (BMPs), which establishes minimum stormwater management requirements and controls. To reduce the potential for soil erosion and the loss of topsoil, a Stormwater Pollution Prevention Plan (SWPPP) is required by the RWQCB

regulations to be developed by a QSD (Qualified SWPPP Developer). The SWPPP is required to address site-specific conditions related to specific grading and construction activities. The SWPPP would identify potential sources of erosion and sedimentation to prevent loss of topsoil during construction, and to identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags; stabilized construction entrances/exits; hydroseeding, and similar measures. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Local and State requirements would prevent soil erosion and the loss of topsoil from occurring as a result of future development. Therefore, the HEU would result in a less than significant impact.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. The City's water system serves water to approximately 26,000 people through 7,500 residential, commercial and industrial service connections, and 156 miles of pipe in length. The City has four active wells, located in southwesterly portions of Norco, and three purchased water connections. The City of Norco purchases treated groundwater produced by the Arlington Desalter Facility and Chino Desalter Authority. In addition, Norco also purchases a small amount of water from the City of Corona. During 2017, drinking water was approximately 84.1 percent purchased treated groundwater and 15.9 percent groundwater from Norco's Temescal groundwater basin wells.

Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation and compliance with changing State law. The City of Norco Urban Water Management Plan (UWMP)¹² projects a demand of 7,557 water connections by 2030 and a supply of 14,400 connections. The City's RHNA allocation of 454 new housing units is within this projected increase. Therefore, the HEU would not decrease groundwater supplies or interfere substantially with groundwater recharge and would result in a less than significant impact.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation and compliance with changing State law. Development would include construction activities, such as clearing, grading, paving, and building construction, that have potential to increase erosion.

All construction would be required to comply with Chapter 15.90 of the City's Municipal Code, City of Norco Grading Requirements, and Chapter 15.70, City of Norco Stormwater/Urban Runoff Management and Discharge Controls. Additionally, all proposed development would be required to comply with and the California RWQCB Order No. R8-2010-0033, NPDES Permit No. CAS618033 – Construction General Permit requirements. Requirements include installation of BMPs, which establishes minimum stormwater management requirements and controls. To reduce the potential for soil erosion and the loss of topsoil, a SWPPP is required by the RWQCB regulations to be developed by a QSD. The SWPPP is required to address site-specific conditions related to

¹² Available at <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=29041>

specific grading and construction activities. The SWPPP would identify potential sources of erosion and sedimentation to prevent loss of topsoil during construction, and to identify erosion control BMPs to reduce or eliminate the erosion and loss of topsoil, such as use of silt fencing, fiber rolls, or gravel bags; stabilized construction entrances/exits; hydroseeding, and similar measures.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Local and state requirements that would be implemented as part of the City's development permitting process would prevent soil erosion and the loss of topsoil from occurring as a result of future development. Therefore, the Project would result in a less than significant impact.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?

Less Than Significant Impact. As described in the previous responses, the HEU would result in future development of new impervious surfaces such as parking lots, sidewalks, and buildings that could increase the levels of runoff. However, flooding from runoff would be avoided through compliance with State and local stormwater standards. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards and would be required to treat and manage runoff, which would be permitted through the City's development review process to ensure drainage requirements are met. Therefore, the HEU would result in a less than significant impact.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As described in the previous responses, future development of the four RHNA sites would convert vacant parcels to developed residential site resulting in new impervious surfaces such as parking lots, sidewalks, and buildings that could increase the levels of runoff, as water infiltration rates could be reduced. However, through compliance with State and local stormwater standards implemented by the City's development permitting process, future development would be required to treat and manage anticipated runoff. Therefore, the HEU would result in a less than significant impact.

iv) impede or redirect flood flows?

Less Than Significant Impact. According to the Flood Insurance Rate Map (FIRM), published by the Federal Emergency Management Agency (FEMA) (06065C0687G)¹³, Sites 1 and 2 identified for future housing are within Zone X, Other Flood Areas, an area of 0.2 percent annual chance flood; one percent annual chance flood with average depths of less than one foot or with drainage areas less than one square mile; and protected by levees from one percent annual chance flood. Sites 3 and 4 are located in Zone X, Other Areas, areas determined to be outside of the 0.2 percent annual chance floodplain. The City's permitting process would ensure that the drainage system specifications adhere to the existing drainage requirements, and compliance with existing regulations would ensure that impacts would be less than significant. Therefore, the HEU would result in a less than significant impact.

¹³ Available at <https://msc.fema.gov/portal/home>.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation and compliance with changing State law. As described in the previous response, the four development sites identified for future housing development are located in Zone X, area of minimal flood hazard. Thus, impacts related to flood hazards would not occur. According to the California Department of Water Resources Inundation Maps¹⁴ and the City's Safety Element¹⁵, the City of Norco is not subject to inundation from failure of nearby dams and/or reservoirs. The City's Safety Element states that, "even though the upper reaches of the Prado Basin would extend up the Santa Ana River channel adjacent to Norco during capacity flood conditions, the water would stay within the established river channel"¹⁶.

A tsunami is a great sea wave produced by undersea disturbances such as tectonic displacement or large earthquakes. Norco is located 30 miles to the northeast of the Pacific Ocean and separated by the Santa Ana Mountains. Due to the distance of the City from the ocean, impacts related to tsunami would not occur.

A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin such as a reservoir, harbor, lake, or storage tank. Identified sites for future housing are approximately 0.3 mile east of Lake Norconian, which is a 55-acre artificial lake that is fed by well water that is piped to the lake. The depth of the water in the lake is generally maintained at 3 feet; however, the lake has a maximum depth of 14-feet, which provides capacity for stormwater runoff¹⁷. To ensure that the lake does not result in flooding of surrounding areas, spillovers exist at both the west and south portions of the lake¹⁸. Therefore, the lake contains a limited volume of water that could overflow, and any overflow would be accommodated by the spillways that are designed to accommodate the lake. Therefore, the four identified housing sites would not be impacted by a seiche event and the HEU would result in no impact.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The Santa Ana River flows through the northern portion of Norco. The Santa Ana River Basin Plan includes water quality goals and policies, descriptions of conditions, and discussions of solutions for the basin. Future residential development in fulfillment of the City's RHNA allocation and housing programs would comply with State and local regulations, through the City's development permitting process, which would ensure pollutants are not discharged from future development sites and that infiltration into the groundwater occurs as required. Therefore, the HEU would not obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts would be less than significant.

¹⁴ Available at <https://water.ca.gov/Programs/All-Programs/Division-of-Safety-of-Dams/Inundation-Maps>.

¹⁵ General Plan Safety Element Section 2.1.3.

¹⁶ *Id.*

¹⁷ Integrated Natural Resources Management Plan Naval Weapons Station Seal Beach Detachment Norco, Norco, California, 2013. Accessed: https://www.cnrc.navy.mil/content/dam/cnrc/cnrcsw/NAVFACSW%20Environmental%20Core/Norco_INRMP_signed.pdf

¹⁸ *ibid*

5.11 LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Physically divide an established community?

No Impact. The physical division of an established community could occur if a major road (expressway or freeway, for example) were built through an existing community or neighborhood, or if a major development was built which was inconsistent with the land uses in the community such that it divided the community. The environmental effects caused by such a facility or land use could include lack of, or disruption of, access to services, schools, or shopping areas.

The four housing sites identified for future development are infill locations surrounded by existing development that includes, residential, commercial, and office uses that are complementary to new residences. The change of the four development sites from vacant sites to a residential neighborhood would not physically divide an established community. Similarly, other infill residential development within the City that would occur from the HEU have been zoned for residential uses and would not divide any established communities. In addition, the HEU would not change roadways, pedestrian bridges, or install any infrastructure that would result in a physical division. Therefore, the HEU would result in no impact.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The HEU includes several program updates. Proposed changes would amend existing housing policies to be in compliance with State law, which require the protection of certain at-risk groups from housing discrimination and provides for planned expansion of the State’s housing stock to meet current and anticipated demand. The HEU is a policy document, and its adoption would not, in itself, produce environmental impacts. However, implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation. Sites identified for future housing development are within the HDO zone. The HDO zone applies to specific properties within the City and requires an HDO Site Plan to guide development on each site. The City would revise the existing HDO zone such that residential development that includes at least 20 percent of units affordable to low-income households, would be approved by right on the four development sites. The development on the sites would be required to meet zoning and other development standards. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action and would be required to meet City standards through the development permitting process. Therefore, the HEU would not conflict with land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect and would result in no impact.

5.1 2 MINERAL RESOURCES

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

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The General Plan Conservation Element Exhibit 3.7, *Mineral Resources*, shows that the sites identified for future housing development are not within an area of known mineral resources. A very small northern portion of Sites 3 and 4 overlap an area designated as MRZ-3a Zone, an area containing known mineral deposits that may qualify as mineral resources. The portion of land overlapping the mineral zone is negligible. Therefore, the HEU would not result in the loss of availability of a known mineral resource and there would be no impact.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on the general plan, specific plan or other land use plan?

Less Than Significant Impact. As stated above, a very small northern portion of Sites 3 and 4 overlap an area designated as MRZ-3a Zone, an area containing known mineral deposits that may qualify as mineral resources. However, no known mineral resources exist on the site, no history of mining occurs on or near the development sites, and the sites are zoned for urban uses. Therefore, the HEU would result in a less than significant impact.

5.13 NOISE

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. The City’s Noise Ordinance, Norco Municipal Code Chapter 9.07, sets forth regulations concerning the generation and control of noise. Norco Municipal Code Section 9.07.020 exempts construction noise for private construction projects located within a quarter mile of an inhabited dwelling provided that construction does not occur between 7:00 p.m. and 7:00 a.m. Monday through Friday or 7:00 p.m. and 8:00 a.m. on Saturday and Sunday. In addition, Norco Municipal Code Section 15.30.020 states that construction activity, including the loading and unloading of materials, shall not occur before 6:30 a.m. or after 7:00 p.m. on weekdays.

Norco Municipal Code Section 9.07.040 sets exterior noise standards of various land uses for occupied property in the City. The exterior sound level for residential land uses is 55 dBA L_{max} from 7:00 a.m. to 10:00 p.m. and 45 A-weighted decibel (dBA) L_{max} from 10:00 p.m. to 7:00 a.m.

Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation. Four development sites are identified, which are adjacent to residential, commercial, office, and vacant areas. During construction activities associated with future residential development, the potential would exist for temporary increases in noise levels on and adjacent to project sites. Residential development also has the potential to result in incremental increases in long-term noise levels generated by increased vehicular traffic as well as new stationary sources of noise. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a project-specific evaluation to assess potential noise impacts and ensure that applicable noise standards are adhered to. All future development would be ensured to comply with the City noise regulations through the development permitting process. Therefore, the HEU would result in a less than significant impact.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. Implementation of the housing programs in the HEU would facilitate housing development to meet the City’s RHNA allocation. The potential for groundborne vibration

is specific to the proposed construction activities, which are currently unknown. However, the development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a specific evaluation to assess potential vibration impacts. The City's construction permitting process would provide project specific measures to ensure that potential vibration impacts are less than significant. Therefore, the HEU would result in a less than significant impact.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The nearest airport is the Corona Municipal Airport, which has an airport land use compatibility area that overlaps the western portion of Norco. The Corona Municipal Airport is approximately 2.5 miles to the southwest of Sites 3 and 4. The RHNA sites identified for future housing development are not within the airport compatibility zone. Therefore, the Project would result in no impact.

5.14 POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Induce substantial unplanned population growth in an area, either directly or indirectly?

No Impact. Implementation of the HEU would facilitate housing development to meet the City’s RHNA allocation of 454 units. The four development sites within the HEU are consistent with the existing 2014-2021 Housing Element, and thus have been planned for growth. Additionally, the growth anticipated in the HEU (RHNA allocation) is consistent with SCAG growth projections. Proposed housing programs would amend existing housing policies to be in compliance with State law, which require the protection of certain at-risk groups from housing discrimination and provides for planned expansion of the State’s housing stock to meet current and anticipated demand. Overall, the HEU is a compliance document that is required to show the housing development availability to meet the needs of future growth. The HEU does not induce unplanned growth.

In addition, the new development identified by the HEU would be served by the existing public roadways and would connect into the existing utility and infrastructure system. The HEU does not include, and would not result in, an extension of roads or other infrastructure that could induce substantial population growth. Therefore, the HEU would result in no impact.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. The four sites identified for future housing development are vacant, except for a portion of Sites 3 and 4, that includes an RV dealership in the easternmost portion of the sites. There is no existing housing on any of the development sites. Therefore, the HEU would not displace existing people or housing and would result in no impact.

5.1 5 PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Result in substantial adverse physical impacts associated with the provision of 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:

Implementation of the HEU would facilitate housing development to meet the City’s RHNA allocation of 454 residential units. Future development would incrementally increase the demand for City services.

i. Fire Protection and Emergency Services

Less Than Significant Impact. The City of Norco contracts with the Riverside County Fire Department/Cal Fire (RCFD) for all fire and emergency services. There are three fire stations located within the City of Norco. The closest fire stations to the four development sites include the following:

- Station 14, located at 1511 Hamner Avenue, which is 1.4 miles from sites 1 and 2 and 0.7 mile from sites 3 and 4.
- Station 57, located at 3367 Corydon Avenue, which is 1.0 miles from sites 1 and 2 and 1.3 miles from sites 3 and 4.
- Station 47, located at 3902 Hillside Avenue, which is 1.6 miles from sites 1 and 2 and 2.0 miles from sites 3 and 4.

The housing units that would be facilitated by the HEU would result in calls for fire department services, which would increase needs for fire department staffing and equipment over the existing condition. However, new residential uses in the City are required to include all fire related safety features pursuant to the California Fire Code, which is included in the City’s Municipal Code as Section 15.09.010. Additionally, the City’s Building Department and the Fire Department would review the building plans prior to approval to ensure that all applicable fire safety features are included in each development project, which would reduce the potential for fire hazards.

As described above, the County of Riverside Fire Department has three existing fire stations in the City and Station 14 is located 0.7 mile from Sites 3 and 4, while Station 57 is located 1.0 mile from

Sites 1 and 2. These existing fire facilities would respond to any emergency or medical services to the four development sites. Therefore, impacts related to fire protection services would be less than significant.

ii. Police Protection

Less Than Significant Impact. The City contracts with the Riverside County Sheriff's Department. Services to Norco are generally provided from the Jurupa Valley Sheriff's Station, which is located at 7477 Mission Boulevard in Jurupa Valley, approximately 10 miles away from identified RHNA sites. The Jurupa Valley Sheriff's Station serves an area of approximately 94 square miles, which includes the Cities of Norco and Eastvale. Additionally, a Sheriff's Department substation is located in the City Hall building (at 2870 Clark Avenue), which is directly to the south of RHNA sites 1 and 2 and 0.5 to the north of RHNA sites 3 and 4. However, the substation has limited hours of operation of 10:00 a.m. - 2:00 p.m., Monday through Friday.

The housing units that would be facilitated by the HEU would result in an incremental increase in calls for police services, which would increase needs for fire department staffing and equipment over the existing condition. However, pursuant to the City's existing permitting process, the Building Department would review development plans to ensure that crime prevention measures are incorporated appropriately to provide a safe environment. Also, the Sherriff's Department via City contract for law enforcement services would continue to add staff and equipment on an as-needed basis in order to accommodate the incrementally increasing demands, and new or expanded police facilities would not be required from implementation of the HEU. Therefore, impacts would be less than significant.

iii. School Services

Less Than Significant Impact. Norco residents are predominately served by the Corona-Norco Unified School District (CNUUSD), which is the largest school district in Riverside County and the ninth largest school district in California. The school district has 29 elementary schools, 7 middle schools, and 8 high schools. Students from future residences within the four development sites would attend the following schools:

- Highland Elementary School (K - 6), located at 2301 Alhambra Street,
- Norco Intermediate School (7 - 8), located at 2711 Temescal Avenue, and
- Norco High School (9-12), located at 2065 Temescal Avenue.

California Government Code Section 65995 authorizes school districts to collect impact fees from developers of new residential projects. The need for additional school facilities is addressed through compliance with school impact fee assessment. Pursuant to Government Code Section 65995 the project applicant shall pay developer fees to the school district at the time building permits are issued; and payment of the adopted fees provides full and complete mitigation of school impacts. As a result, impacts related to school facilities would be less than significant with the Government Code required fee payments, which would be required during permitting of each residential project. Therefore, the HEU would result in a less than significant impact.

iv. Parks

Less Than Significant Impact. The City of Norco is home to 15 outdoor public parks, and 1,791 acres of existing land use in Norco is designated public use and open space, served by the City of Norco Parks, Recreation, and Community Services Department. Typically, residential development increases the need for new parks and increases the use of existing citywide park facilities. The City's Municipal Code Chapter 17.14, *Park Dedication*, describes that the City requires a dedication or in-lieu payment based on five acres of parkland for every 1,000 residents within the City. The

municipal code describes that the money collected shall be used only for the purpose of acquiring necessary land and developing new or rehabilitating existing park or recreational facilities. Future development pursuant to the HEU would be required to provide parkland, fees for parkland, or a combination of both, to meet the park needs that would result from new residential development. Therefore, the HEU would result in a less than significant impact.

v. Other Public Facilities

Less Than Significant Impact. Future development of residential units to meet the City's RHNA allocation could result in a limited increase in the use of other public facilities such as libraries, community centers, post offices or animal shelters. The four development sites are located near existing public facilities. Additional residences would result in a limited incremental increase in the need for additional services. The City of Norco, including the areas along Hamner Avenue, are already served by other service facilities and the new residences identified by the HEU would be accommodated by the existing facilities. Therefore, the HEU would result in a less than significant impact.

5.16 RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated?

Less Than Significant Impact. As described previously, the City has 15 outdoor public parks, and 1,791 acres of existing land use in Norco is designated public use and open space. Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation. Typically, residential development increases the need for new parks and increases the use of existing citywide park facilities. City’s Municipal Code Chapter 17.14, *Park Dedication*, describes that the City requires a dedication or in-lieu payment based on five acres of parkland for every 1,000 residents within the City. The municipal code describes that the money collected shall be used only for the purpose of acquiring necessary land and developing new or rehabilitating existing park or recreational facilities. Future development pursuant to the HEU would be required to provide parkland, fees for parkland, or a combination of both, to meet the need for recreational facilities and for maintenance to avoid physical deterioration. Therefore, the increase in use of parks and recreational facilities from implementation of the HEU would be less than significant.

b) Require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation. Future development may include construction or expansion of recreational facilities; however, the details of future development projects are unknown. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo an evaluation of the potential impacts related to construction and would be required to implement measures to reduce impacts to a less than significant level, which would be implemented through the development permitting process. Therefore, the HEU would result in a less than significant impact.

5.17 TRANSPORTATION

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

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

No Impact. Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation of 454 residential units. The four development sites are located along arterial roadways and have been planned for urban developed uses that would generate vehicular trips. However, the specifications related to the development of the sites is currently unknown. Therefore, future development would be required to provide circulation plans that would be reviewed by the City to identify any potential conflict with a program or policy that could affect the circulation system. Project specific measures would be required through the City’s development review and permitting process to reduce potential traffic related impacts. In addition, the HDU does not involve any changes that would remove or impact any pedestrian facilities, bicycle lanes, or transit. Therefore, the HEU would not conflict with any circulation facilities.

b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?

Less Than Significant Impact. The CEQA Guidelines § 15064.3(b) provides criteria for analyzing transportation impacts. For land use projects, such as the proposed Project, CEQA Guidelines § 15064.3(b) states that vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. In addition, it states that the analysis includes evaluation of factors such as the availability of transit, proximity to other destinations, etc. This section also provides guidance on setting thresholds for VMT and methodology for evaluating VMT. According to CEQA Guidelines Section 15064.3(C), the provisions of Section 15064.3 shall apply statewide beginning on July 1, 2020. Prior to July 1, 2020, lead agencies may elect to utilize VMT as a CEQA threshold, but are not required to analyze VMT.

The City of Norco, consistent with other cities within WRCOG, uses WRCOG’s VMT Screening Tool (Screening Tool). The City has adopted project level screening thresholds consistent with those recommended in the Technical Advisory and used by WRCOG’s VMT Screening Tool (City Guidelines). The Screening Tool was used to evaluate the four development parcels to identify potential VMT impacts.

The Screening Tool determined that the four development parcels are within a low VMT generating Traffic Analysis Zone (TAZ) for residential uses. The Screening Tool shows that the jurisdictional average 2012 daily residential home-based VMT per capita is 13.05; and that the VMT for the TAZ that contains development sites 1 and 2 is 12.17 VMT per capita and the TAZ that contains sites 3 and 4 is 11.49 VMT per capita. Because the 4 development sites are within low VMT generating TAZs for residential uses, use of these sites by the HEU to meet the City's RHNA allocation would result in a less than significant impact related to VMT. Therefore, the HEU would result in less than significant impact related to VMT.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation. Only housing uses are anticipated by the HEU, and no incompatible uses would occur. The City's construction permitting process includes review of project site plans to ensure that no potentially hazardous transportation design features are introduced by the project. For example, sight distance at proposed driveways would be reviewed for conformance with City of Norco sight distance standards at the time of permitting approvals. All future development would be reviewed and approved by the City to ensure there is not an increase in traffic hazards due to geometric design features. Therefore, the HEU would result in no impact.

d) Result in inadequate emergency access?

Less than Significant Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation. The City's construction permitting process includes review of project site plans to ensure that adequate emergency access is provided in the circulation design of the project. Because development projects are required to comply with all applicable City codes, as verified by the City permitting process for new construction, potential impacts related to inadequate emergency access would be less than significant.

5.18 TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

No Impact. As described previously, the four development sites are undeveloped and vacant, except for an RV dealership that is located on the eastern portions of sites 3 and 4. Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation. Identified sites for future housing development do not contain any historic resources, including any listed or eligible for listing in the California Register of Historical Resources. Other sites that may be developed for residential uses would be evaluated for potential historic resources at the time that specific development projects are proposed. Therefore, the HEU would not result in impacts.

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Less Than Significant Impact. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources (Public Resources Code § 21074).

AB 52 and SB 18 Requirements

The HEU is required to comply with AB 52 and SB 18 regarding tribal consultation. Chapter 532, Statutes of 2014 (i.e., AB 52), requires that Lead Agencies evaluate a project’s potential to impact “tribal cultural resources.” Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register or included in a local register of historical resources (PRC Section

21074). AB 52 also gives Lead Agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside the definition stated above nonetheless qualifies as a “tribal cultural resource.”

SB 18 requires cities and counties acting as Lead Agency to contact and consult with California Native American tribes before adopting or amending a General Plan, which includes updating the General Plan Housing Element. The intent of SB 18 is to establish meaningful consultation between tribal governments and local governments at the earliest possible point in the planning process and to enable tribes to manage “cultural places.” Cultural places are defined as a Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine (PRC Section 5097.9), or a Native American historic, cultural, or sacred site, that is listed or may be eligible for listing in the California Register, including any historic or prehistoric ruins, any burial ground, or any archaeological or historic site (PRC Section 5097.993).

In compliance with these requirements, on May 5, 2021, the City sent letters to the following Native American tribes that may have knowledge regarding tribal cultural resources in the City.

- Cabazon Band of Mission Indians
- Agua Caliente
- Cahuila Band of Indians
- Colorado River Indian Tribes
- Gabrieleño Band of Mission Indians – Kizh Nation
- Morongo Band of Mission Indians
- Pala Tribe
- Quenchen Indian Nation
- Ramona Band of Cahuilla Indians
- Rincon Band of Luiseno Indians
- San Manuel Band of Mission Indians
- Soboba Band of Luiseno Indians
- Temecula Band of Luiseno Indians (Pechanga)
- Torrez Martinez Desert Cahuilla Indians
- Twenty Nine Palms Band of Mission Indians

The City of Norco received one request to consult from the Temecula Band of Luiseno Indians (Pechanga) and is currently in consultation with the tribe in compliance with requirements of AB 52 and SB 18.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Furthermore, discretionary actions, such as approval of a development permit or grading permit, would be subject to environmental review that would evaluate potential impacts to tribal cultural resources, and additional tribal consultation as required by AB 52. Appropriate development specific measures would be identified during the City’s development review and permitting process that would reduce potential impacts to a less than significant level.

Additionally, California Health and Safety Code, Section 7050.5 requires that if human remains are discovered, disturbance of the site shall halt and remain halted until the coroner has conducted an investigation. If the coroner determines that the remains are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Therefore, the HEU would result in a less than significant impact.

5.19 UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation. The four development sites identified for future housing development are infill locations surrounded by roadways that contain utility infrastructure and adjacent to existing development that is served by these utilities service systems. The four development sites have been planned for urban uses.

The HEU consists of housing policies and programs designed to facilitate provision of housing to meet State requirements. The HEU is a policy document that does not propose site specific development and adoption of the HEU would not result in physical effects to the environment. Future housing development implementing the HEU would be required to obtain City approval on a project-by-project basis and would still be subject to all existing City and State standards. Furthermore, discretionary actions, such as approval of a development permit or grading permit, would be subject to environmental review that would evaluate the specific development proposal and the related utility systems to ensure that the project would be served by the existing systems. Therefore, the HEU would result in a less than significant impact.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less Than Significant Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation of 454 residential units. Development of housing would require additional potable water resources to operate. The City of Norco UWMP projects a demand of 7,557 water connections by 2030 and a supply of 14,400 connections¹⁹. The RHNA quantified goal of the HEU is 454 new housing units is within these projections. Additionally the UWMP includes a contingency plan and supply assessment for dry year(s). Therefore, the HEU would result in a less than significant impact.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The City of Norco would provide wastewater collection. The City is within the boundaries of the Western Municipal Water District of Riverside County. The City's wastewater is conveyed to the Western Riverside County Regional Wastewater Authority (WRCRWA) regional treatment plant in Eastvale. The WRCRWA treatment facility currently has a maximum treatment plant capacity of 14 million gallons per day (MGD) and currently treats approximately 7.75 mgd (WRCRWA March 18, 2019). The City of Norco owns 27.5 percent of the WRCRWA treatment facility's total capacity, or a total capacity of 2.70 mgd, and currently discharges 1.71 mgd (WRCRWA 2019). Hence, the City has approximately 0.99 mgd additional capacity at the WRCRWA treatment facility. The City also owns 100,000 gpd of sewer capacity and wastewater treatment capacity in the City of Corona wastewater system.

Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation of 454 residential units, which would result in a limited volume of wastewater that would be within the City's existing wastewater treatment capacity. Therefore, the HEU would result in a less than significant impact.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The City of Norco disposes a majority of its solid waste at the El Sobrante Landfill. The El Sobrante Landfill is permitted to accept 16,054 tons of solid waste per day through 2050. In March 2021, the landfill averaged 10,443 tons per day and had a maximum disposal of 12,566 tons per day; thus, having an average daily additional capacity of 5,611 tons per day and a minimum additional capacity of 3,488 tons per day.

Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation of 454 residential units. Residential development would increase in the amount of solid waste generated, thereby resulting in a contribution of waste that would add to the capacity at the El Sobrante Landfill and any other landfills that serve the city. However, at least 75 percent of the solid waste is required by AB 341 to be recycled, which would reduce the volume of landfilled solid waste. Based on existing and remaining capacity, existing landfills are anticipated to have capacity to service future development. Therefore, the HEU would have a less than significant impact.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

¹⁹ Available at <http://www.norco.ca.us/civicax/filebank/blobdload.aspx?BlobID=29041>

No Impact. The HEU would facilitate new housing development that would generate an increased amount of solid waste. All solid waste-generating activities within the City is subject to the requirements set forth in Section 5.408.1 of the 2016 California Green Building Standards Code that requires demolition and construction activities to recycle or reuse a minimum of 65 percent of the nonhazardous construction and demolition waste, and AB 341 that requires diversion of a minimum of 75 percent of operational solid waste. Implementation of proposed developments would be consistent with all state regulations, as ensured through the City's development project permitting process. Therefore, the HEU would comply with all solid waste statute and regulations; and impacts would not occur.

5.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input 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"/>
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"/>

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

According to the CalFire Fire Hazard Severity Zone Map for Western Riverside County²⁰ and the Fire Hazards Map in the City’s Safety Element²¹, Norco contains fire hazard zones in the eastern portion of the City, within and surrounding the hillside, on Beacon Hill, and a moderate fire hazard zone surrounds the Santa Ana River. The four development sites are not located within a fire hazard zone.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Implementation of the housing programs would facilitate housing development to meet the City’s RHNA allocation and compliance with changing State law. The identified housing development sites that would meet RHNA objectives are not located within fire hazard zones. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a development permit, and undergo a project specific review to ensure adequate emergency access to ensure that the development would not impair an adopted emergency response or evacuation plan. Therefore, the HEU would not result in an impact.

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?

²⁰ Available at <https://osfm.fire.ca.gov/media/5919/norco.pdf>.

²¹ General Plan Safety Element Section 2.1.2 and Fire Hazards Map at page 9.

No Impact. As described in the previous response, the four development sites are not within a fire hazard zone. In addition, the sites and areas adjacent to the sites are urbanized and do not contain hillsides or other factors that could exacerbate wildfire risks. New residential uses in the City are required to include all fire related safety features pursuant to the California Fire Code, which is included in the City's Municipal Code as Section 15.09.010. The City's Building Department and the Fire Department would review the building plans prior to approval to ensure that all applicable fire safety features are included in each development project. Therefore, the HEU would not result in impacts.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. As described in the previous response, the four development sites are not within a fire hazard zone and are surrounded by roadways and developed areas. Development proposed as a result of the HEU is not anticipated to require infrastructure that could exacerbate fire risk. Each development project would be required to include all fire related safety features pursuant to the California Fire Code, as included in the City's Municipal Code as Section 15.09.010, which would be reviewed by the City's Building Department and the Fire Department prior to permitting approval to ensure that no project features would exacerbate fire risks. Therefore, the HEU would not result in an 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?

No Impact. As described in the previous responses, the four development sites are not within a fire hazard zone. In addition, the sites are located in a flat area that does not contain or is adjacent to large slopes, and the sites are not located within a flood hazard zone. Runoff generated by future development would be required to be accommodated by development installed infrastructure, which would be ensured through the City's development permitting process. Therefore, the HEU would not result in an impact.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which 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"/>

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

Less Than Significant Impact. As described in Section 5.4, *Biological Resources*, implementation of the programs contained in the HEU would accommodate development required to meet the City's RHNA. The four sites identified for future development are infill locations surrounded by roadways, and existing development and habitat is limited to ruderal vegetation. Identified housing sites are not located within designated habitat areas as shown in Exhibit 3.8, *Wildlife Resources*, of the General Plan Conservation Element. Therefore, significant impacts related to plant and animal communities are not anticipated. Also, specific potential effects to biological resources of future residential projects would be assessed at the time the projects are proposed. Specific measures would then be adopted as necessary.

Also, as described in Section 5.5, *Cultural Resources* and Section 5.18, *Tribal Cultural Resources*, ground-disturbing activities of future development have the potential to uncover previously undiscovered resources depending upon the extent of construction and the depth of excavation. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a project specific evaluation of the potential of construction activities to encounter archeological resources, and measures would be required as part of the construction permit, if necessary, that would reduce impacts. Therefore, impacts would be less than significant.

- b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?**

Less Than Significant Impact. Cumulative impacts are defined as two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the development when added to the impacts of other closely related past, present, and reasonably foreseeable or probable future developments. Cumulative impacts can result from individually minor, but collectively significant, developments taking place over a period. The CEQA Guidelines, Section 15130 (a) and (b), states:

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

The HUE proposes several program changes to comply with State law, as well as, identifying available development sites to accommodate RHNA's quantified objective administered to the City for the 2021-2029 planning cycle. The Housing Element also provides for the continuation of the preexisting policies and programs that were adopted in the 2014-2021 Housing Element. The sites identified for future housing development are consistent with the City's existing zoning and land use designations, and have been previously identified for residential uses. All environmental issues were found to have no impacts or less than significant impacts. Therefore, the HEU would not be cumulatively considerable and impacts would be less than significant.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

Less Than Significant Impact. Implementation of the housing programs would facilitate housing development to meet the City's RHNA allocation and compliance with changing State law. Development proposed as a result of the HEU would be required to obtain City approval on a project-by-project basis for any discretionary action, such as approval of a grading permit, and undergo a development specific review to reduce the potential for any impacts. As detailed previously, all environmental issues were found to have no impacts or less than significant impacts. Therefore, the HEU would not cause substantial adverse effects on human beings, and impacts would be less than significant.

6 References

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- California Department of Transportation (Caltrans). *California Scenic Highway Mapping System, Riverside County*. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/
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- Western Riverside County Regional Conservation Authority. *Western Riverside County Multi-Species Habitat Conservation Plan*.
- Western Riverside County Regional Wastewater Authority Board of Directors Agenda Item 5.B. March 18, 2019 (WRCRWA March 18, 2019). Accessed at: http://www.wrcrwa.org/AgendaCenter/ViewFile/Agenda/_03182019-109

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