

**Cumulative Impacts.** Implementation of the proposed MSHCP may result in impacts to biological resources; agricultural and mineral resources; population, housing, and employment; fire protection and parks; and transportation and traffic that may be cumulatively considerable. The EIR/EIS addresses the potential cumulative impacts of the proposed MSHCP in Section 5.0.

**Indirect Impacts (Growth-Inducing Effects).** Authorization of take with the implementation of the proposed MSHCP could remove an impediment to development. This potential impact of growth inducement is analyzed in Section 6.0 of the EIR/EIS.

**Other Impacts.** The proposed MSHCP may result in impacts relating to:

- The irreversible or irretrievable commitment of resources;
- Significant irreversible changes to the environment;
- Natural or depletable resource requirements, and conservation potential;
- Energy requirements and conservation potential;
- The relationship between short-term uses of the environment and the maintenance and enhancement of long-term productivity, and effects on urban quality, historical and cultural resources; and
- The design of the built environment, including the reuse and conservation potential.

These potential impacts are discussed in Section 6.0 of the EIR/EIS.

### **1.5.5 Issues Not Considered Significant and Not Selected for Detailed Analysis**

Adoption of the proposed MSHCP or one of the alternative scenarios and issuance of a take permit under Section 10(a)(1)(b) of the FESA would permanently reserve portions of habitat in western Riverside County and would permit take of Covered Species outside the reserve. Long-term implementation of the proposed MSHCP would result in changes to the regional pattern of land use, with possible increased development pressure and intensification of development outside the criteria areas.

State CEQA Guidelines Section 15128 requires that an environmental document include a brief discussion of those environmental issues that were determined not to be significant. It was determined in the Initial Study that implementation of the proposed MSHCP would result in no significant environmental effects related to the following issue areas: Aesthetics, Air Quality, Cultural Resources, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land use (community division and HCP conflicts only), Noise, Public Services (with the exception of fire protection and parks), Utilities, and Environmental Justice.

The proposed MSHCP protects species by conserving habitat, restoring degraded habitat, managing the reserve system, and conducting biological monitoring. While the Proposed Project would result in the issuance of incidental take permits for

Covered Species to the participating jurisdictions, individual project proponents would still be required to conduct environmental review in compliance with CEQA.

Issue areas identified as having less than significant impacts are discussed in the Initial Study and summarized as follows:

**Aesthetics.** While the primary goal of the proposed MSHCP is the protection and preservation of natural habitats, the proposed MSHCP would have a secondary benefit of preserving visual resources (e.g., trees, natural areas, rock outcroppings) and scenic vistas. Implementation of the proposed MSHCP would reserve large areas of open space for habitat, habitat linkages, and hillside areas, enhancing the overall aesthetic value of the region. Because the proposed MSHCP does not entail physical development, implementation of the proposed MSHCP would not create additional sources of light or glare.

Implementation of the proposed MSHCP would likely focus development outside the Conservation Area throughout western Riverside County. By changing development patterns, the MSHCP has potentially significant indirect impacts on aesthetics. However, as indicated above, the MSHCP will establish a flexible criteria-based reserve. Consequently, the precise boundaries of the reserve are not and cannot be known at this time. Moreover, development patterns and market considerations must also figure in to the location of future development. Due to all these factors, it is not possible to determine where and in what densities development will ultimately occur; such an exercise would simply be speculation. Per applicable provisions of CEQA, future site-specific development will be subject to environmental review, and potential visual/aesthetic impacts will be identified, analyzed and mitigated as projects are proposed.

**Air Quality.** The proposed MSHCP Plan Area is located within the South Coast Air Basin (SCAB), an area encompassing Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. Future air quality impacts in western Riverside County would result primarily from the increase in vehicular traffic (as opposed to point source emissions). Air quality impacts tend to be regional in origin, rather than localized, and are based on population growth and land use patterns.

Because there is no physical development associated with the proposed MSHCP, its implementation would not result in direct air quality impacts. Development outside of designated reserves is likely to be higher density “cluster” development along designated corridors throughout western Riverside County. This pattern of development may indirectly result in localized air quality impacts through the generation of carbon monoxide “hot spots” in areas of high traffic congestion. In this sense, the MSHCP could have potentially significant air quality impacts. However, as explained above, due to the number of acres involved, the flexible nature of the reserve’s boundaries, and changing market conditions, it is not possible to predict where future development will occur; this would require speculation. As required by CEQA, future development proposals will undergo environmental review and projects’ potential air quality impacts will be identified, analyzed and mitigated.

**Cultural Resources.** Based on the histories of local Native American communities, soil types within western Riverside County, previous paleontological studies, and historical context, significant archaeological, historic, and/or paleontological resources (collectively “cultural resources”) are known to exist within the MSHCP Plan Area. However, the MSHCP does not propose or authorize any physical development, so its implementation will not result in any direct impacts to cultural resources.

Implementation of the proposed MSHCP will remove an existing impediment to development. Consequently, the MSHCP has the potential for causing indirect impacts on cultural resources. On the one hand, the MSHCP will protect archeological, historic, and paleontological resources within the reserve by preventing any ground-disturbing development in that area. On the other hand, the MSHCP has potential indirect impacts on cultural resources within the Plan Area outside the reserve, as high density development that may occur in areas outside of the reserve may destroy or disturb cultural resources in these areas. Due to the number of acres involved, the flexible nature of the reserve’s boundaries, and changing market conditions, it is not possible to predict where future development will occur; this would require speculation. As required by CEQA, proposals for future development will be subject to environmental review and potential impacts to cultural resources at future development sites will be determined, analyzed and mitigated during project-specific environmental analyses by the County and municipalities in western Riverside County.

There is also the potential that historic human burials may be present in the MSHCP Plan Area. Because the MSHCP does not authorize, approve or contemplate any physical development, it will not have any direct impact on historic human remains. However, as indicated above, the MSHCP does accommodate projected growth by providing take authorization for development within the Plan Area outside the reserve. As with cultural resources, human burial sites within the proposed MSHCP reserve boundaries would be avoided, so no indirect impacts on human remains within the reserve will occur. However, the MSHCP has the potential to have significant indirect impacts on human resources within the Plan Area outside the reserve because development will be shifted to those areas. Since the reserve’s boundaries are not fixed, the Plan encompasses thousands of acres, and development patterns and timing are largely dependent on market conditions and other factors, it is impossible to speculate where future development may occur. However, future development proposals will be subject to environmental review under CEQA. The potential impacts of specific development projects on historic human remains will be identified, analyzed and mitigated when the site-specific projects are proposed.

**Geology and Soils.** Implementation of the proposed MSHCP would result in the establishment of the MSHCP Conservation Area throughout western Riverside County. The intent of the proposed MSHCP (the preservation of sensitive biological communities/resources) would preclude development of urban uses on geologically constrained areas located within reserve boundaries. Because the adoption of the proposed MSHCP does not include the development of physical structures or facilities, it would not increase the potential for geologic/soil stability hazards.

An indirect effect of the proposed MSHCP could be an increase in development pressure outside the boundaries of the reserve, resulting in a change of density, form, and character of development. Such increased development pressure could result in increased development on or near properties that exhibit sensitive or unstable geologic conditions, or on soils subject to erosion or otherwise unsuitable for development. However, because the reserve's boundaries are not fixed, the Plan encompasses thousands of acres, and development patterns and timing are largely dependent on market conditions and other factors, it is impossible to speculate where future development may occur.

Future development within western Riverside County would require environmental analyses in compliance with CEQA. Potential impacts arising from the unique geologic, seismic, or soil conditions at future development sites would be determined, analyzed, and mitigated during project-specific environmental analyses.

**Hazards and Hazardous Materials.** Adoption of the proposed MSHCP would not alter methods utilized to generate, use, store, transport, or dispose of hazardous materials; change the locations of hazardous materials sites; change the locations where hazardous materials are generated, used, stored, or disposed; or modify, impair or interfere with the establishment or execution of emergency response/evacuation plans. While the proposed MSHCP may increase development density outside the MSHCP Conservation Area, the MSHCP does not change the amount of growth that is anticipated to occur in western Riverside County. Therefore, the MSHCP would not have significant direct impacts related to hazards or hazardous materials.

By removing existing regulatory impediments to growth outside the reserve, the MSHCP has the potential for causing indirect impacts on hazards/hazardous materials. Since development in the reserve areas will be precluded, the MSHCP could increase the density of development outside of reserve areas, which may increase development pressures in the vicinity of local airports. However, for the reasons identified above, it is impossible to speculate where growth will occur and whether it will occur in close proximity to airports located within the Plan Area. Potential impacts associated with hazardous materials and other hazards resulting from future development would be determined during project-specific environmental analyses for those individual projects, in compliance with CEQA.

**Hydrology and Water Quality.** The proposed MSHCP does not alter the rate or amount of growth projected for western Riverside County, nor does it propose or authorize any physical construction. Because there would be no change between conditions as they exist now and how they would exist under the Proposed Action, implementation of the proposed MSHCP would not violate any water quality or waste discharge standards, reduce groundwater supplies, alter existing drainage patterns, or cause any other direct impact on hydrology or water quality. Rather, the MSHCP reserve areas would substantially reduce the types of activities that would increase urban runoff or result in erosion or sedimentation. Because implementation of the proposed MSHCP would preclude development in the reserve, the MSHCP's direct impact on water quality will likely be beneficial.

An indirect effect of the proposed MSHCP would be an increase in development pressure outside of the reserve. This effect has the potential for both beneficial and adverse impacts on hydrology and water quality. On the one hand, encouraging dense development would reduce the extent of lands from which erosion and non-point source pollution originate and would have a beneficial effect on water quality and water infiltration. On the other hand, land-clearing activities associated with development increase erosion and sedimentation; runoff from developed uses generally increase the amount of debris, dirt, grease, and petroleum products, and pathogens in storm runoff. Development outside of the proposed MSHCP reserve areas could result in adverse water quality impacts. Because the MSHCP does not alter the amount of development, cumulative discharges to watersheds within western Riverside County would be the same. However, by shifting development patterns, the MSHCP might cause indirect water quality impacts by changing the location of discharges, which might ultimately affect overall water quality. Whether this occurs depends on the location of future development, which, for the reasons explained above, cannot be predicted at this time. In compliance with CEQA, potential hydrology and water quality impacts resulting from future development will be determined during project-specific environmental analyses for those projects as they arise.

**Land Use (Community Division, HCP Conflicts).** The MSHCP does not propose or authorize any physical development. The reserve will be assembled from undeveloped lands. Therefore, implementation of the proposed MSHCP will not directly or indirectly result in the division of an established community. The proposed MSHCP will not have any significant direct or indirect impacts on adopted HCPs and NCCPs. Rather, the MSHCP is specifically designed to augment and complement existing HCPs and NCCPs throughout western Riverside County.

**Noise.** Because implementation of the proposed MSHCP will not result in development, no direct noise impacts would occur. Indirect noise impacts may occur due to increased development pressure and changes to the density, form, and character of development outside reserve areas. Because less land would have to accommodate more people, the intensification of land use could result in the siting of high-volume noise activities in closer proximity to sensitive receptors. As indicated above, it is impossible to speculate where future development might occur. Potential noise resulting from future development in western Riverside County would be determined during future project-specific environmental analyses, in compliance with CEQA.

**Public Services (Police, Schools, Libraries, Others).** The proposed MSHCP does not authorize or contemplate any construction, nor does it result in the loss of existing facilities. Therefore, the MSHCP would not have any significant direct impacts on public services. Regarding indirect impacts, the MSHCP would accommodate growth in areas outside of the reserve areas. Growth in these areas would result in an increased demand for police protection, schools, and libraries, and facilities would likely be constructed in accordance with the relevant General Plans for the municipalities. As indicated above, it is impossible to speculate where and when future development might occur, and, as a result, the locations where demand for public services might be increased, and the location of future facilities, cannot be

determined. Potential public services impacts resulting from future development in western Riverside County will be determined during future project-specific environmental analyses, in compliance with CEQA.

**Utilities.** The proposed MSHCP does not authorize or contemplate any physical development, so it will not require the use, construction, or expansion of water facilities, wastewater treatment facilities, storm drainage facilities, or landfill capacity. Therefore, no direct impact on utilities would result from implementation of the proposed MSHCP. Because the proposed MSHCP could increase pressure to develop areas outside of designated reserves and would encourage more dense or compact development, implementation of the proposed MSHCP could necessitate the “shift” of utility facilities to areas outside of reserve areas. However, for the reasons given above, it is impossible to speculate where future development might occur. Potential impacts to utility facilities and service systems resulting from future development would be determined during preparation of project-specific environmental analyses, in compliance with CEQA.

**Environmental Justice.** Senate Bill 115 (Solis) (Government Code Section 65040.12[c]) established the Governor’s Office of Planning and Research (OPR) as the coordinating agency in California State government for Environmental Justice programs. As defined by SB 115, Environmental Justice is “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws and policies.” Many State and local government agencies have additional Environmental Justice responsibilities pursuant to Title VII of the Civil Rights Act (42 U.S.C. Section 2000d). Title VII requires recipients of federal funds to conduct their activities and/or programs in a nondiscriminatory manner. In addition, the President of the United States issued Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority and Low-Income Populations*, on February 11, 1994. Objectives of the Executive Order include the following:

- Development of federal agency implementation strategies;
- Identification of minority and low-income populations where proposed federal actions could have disproportionately high and adverse human health and environmental effects; and
- Participation of minority and low-income populations in the NEPA process.

The U.S. Department of the Interior (DOI) issued the Environmental Compliance Memoranda on Environmental Justice and Trust Resources, which revises the NEPA guidance, to require an analysis of Environmental Justice issues into the NEPA processes of all federal agencies under the auspices of the DOI, including the USFWS. Environmental Justice issues identify and analyze, as appropriate, disproportionately high and adverse human health or environmental effects of programs, policies, and activities on minority populations and low-income populations

The integration of Environmental Justice was assigned to USFWS Ecological Services with administrative assistance from the Office for Human Resources. Ecological Services serves as a liaison on Environmental Justice matters to the DOI,

other bureaus, and USFWS offices consistent with Departmental policies and mandates. It also ensures USFWS compliance with Departmental guidance on Environmental Justice issues.

Environmental Justice issues were considered in the proposed MSHCP process. On October 20, 1998, the Riverside County Board of Supervisors reviewed consensus “planning principles” submitted by the coalition of interest groups, and endorsed their use as initial guidelines in the early stages of developing the RCIP. Environmental Justice issues were integrated with principles such as acknowledging the rights of private property owners and offering just compensation according to federal and State laws regarding private property reserved for public purposes.

On December 19, 2000, the Riverside County Board of Supervisors provided specific policy direction for development and implementation of the Proposed Action, some of which are pertinent to Environmental Justice issues. Policy directions included the equitable apportionment of conservation actions among local, State, and federal governments, and new development. New development would be assigned in a manner that does not unnecessarily burden new housing and economic development in the proposed MSHCP Plan Area. The acquisition of lands would be in a manner consistent with achieving the conservation goals of the proposed MSHCP. In addition, a policy was put in place to allow farmers to be voluntarily covered for incidental take of Covered Species associated with their ongoing agricultural activities.

As part of the initial multiple-species planning efforts, a Planning Agreement was drafted between the Wildlife Agencies and participating local entities. A foundation of the Planning Agreement was the avoidance of mitigating for species and habitat impacts on a project-by-project basis. It was agreed that the proposed MSHCP would be more equitable and efficient, and less expensive and less time consuming than the process currently used. Furthermore, the Planning Agreement assures property owners, local governments, and other affected parties that conservation measures undertaken for species and wildlife habitat would be covered by the proposed MSHCP and will satisfy mitigation requirements concerning impacts to those Covered Species and their habitats. Moreover, it was agreed that public input and participation would be actively encouraged to obtain public support for the conservation and economic benefits that the parties and participants seek from the proposed MSHCP. To further this principle, notices of hearings and availability of documents were sent to the public in Spanish as well as English. Spanish and Sign language interpreters and were present during public hearings.

Adoption of the proposed MSHCP would not have a direct impact to existing community character, because it preserves existing habitat areas, maintains the visual character of reserve areas and their surroundings, and does not propose physical improvements. No significant impact to community character would occur. An indirect effect of the proposed MSHCP would be the shifting of development densities from reserve areas to non-reserve areas. However, there will not be disproportionate negative impacts on the character of existing minority or low-income communities. There could be a beneficial impact to minority and low-income communities, because the proposed MSHCP would create a reserve system

designed to protect and preserve natural habitats and constituent wildlife populations. To the extent that this contributes to a better quality of life, all populations, including minority and low-income populations, would be expected to enjoy the outcome of the proposed MSHCP.

Significant Environmental Justice impacts would result only if implementation of the Proposed Action or alternatives produce disproportionate significant adverse environmental or human health impacts to low-income or minority population communities. Because the Proposed Action and alternatives would not directly result in any physical change to the environment, there could be no disproportionate significant adverse impacts to minority or low-income communities.