



CITY OF  
**RIVERSIDE**

COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

PLANNING DIVISION

*DRAFT MITIGATED NEGATIVE DECLARATION*

WARD: 3

1. **Case Number:** **P19-0926 (GENERAL PLAN AMENDMENT), P19-0943 (REZONE), P19-0958 (DESIGN REVIEW), P19-0959 (VARIANCE)**
2. **Project Title:** Ivy Street Self Storage Expansion Project
3. **Hearing Date:** September 16, 2021
4. **Lead Agency:** City of Riverside  
Community & Economic Development Department  
Planning Division  
3900 Main Street, 3<sup>rd</sup> Floor  
Riverside, CA 92522
5. **Contact Person:** Brian Norton, Senior Planner  
**Phone Number:** (951) 826-5371
6. **Project Location:** The proposed project is located within the city of Riverside at 2998 Ivy Street between State Route 91 (SR-91) and the BNSF Railroad, south of Ivy Street. The regional location is identified in Figure 1. Figure 2 identifies the project location on a USGS map and Figure 3 shows the project location on an aerial photograph.
7. **Project Applicant/Project Sponsor's Name and Address:**  
  
Andy Turner  
4437 Twain Avenue  
San Diego, California 92120
8. **General Plan Designation:** Existing: LDR (Low Density Residential)
9. **Zoning:** **Existing:** APN 219-270-006 - R-1-7000 (Additional Single-Family Residential Zone)  
APN 223-050-009 – CG (General Commercial)  
**Proposed:** CR-CS (Commercial Retail – Commercial Storage Overlay Zone)
10. **Description of Project:**

The proposed project involves the expansion of the existing self-storage facility located south of the site by constructing an additional storage area of 13,400 square feet on a 1.40 acre parcel.

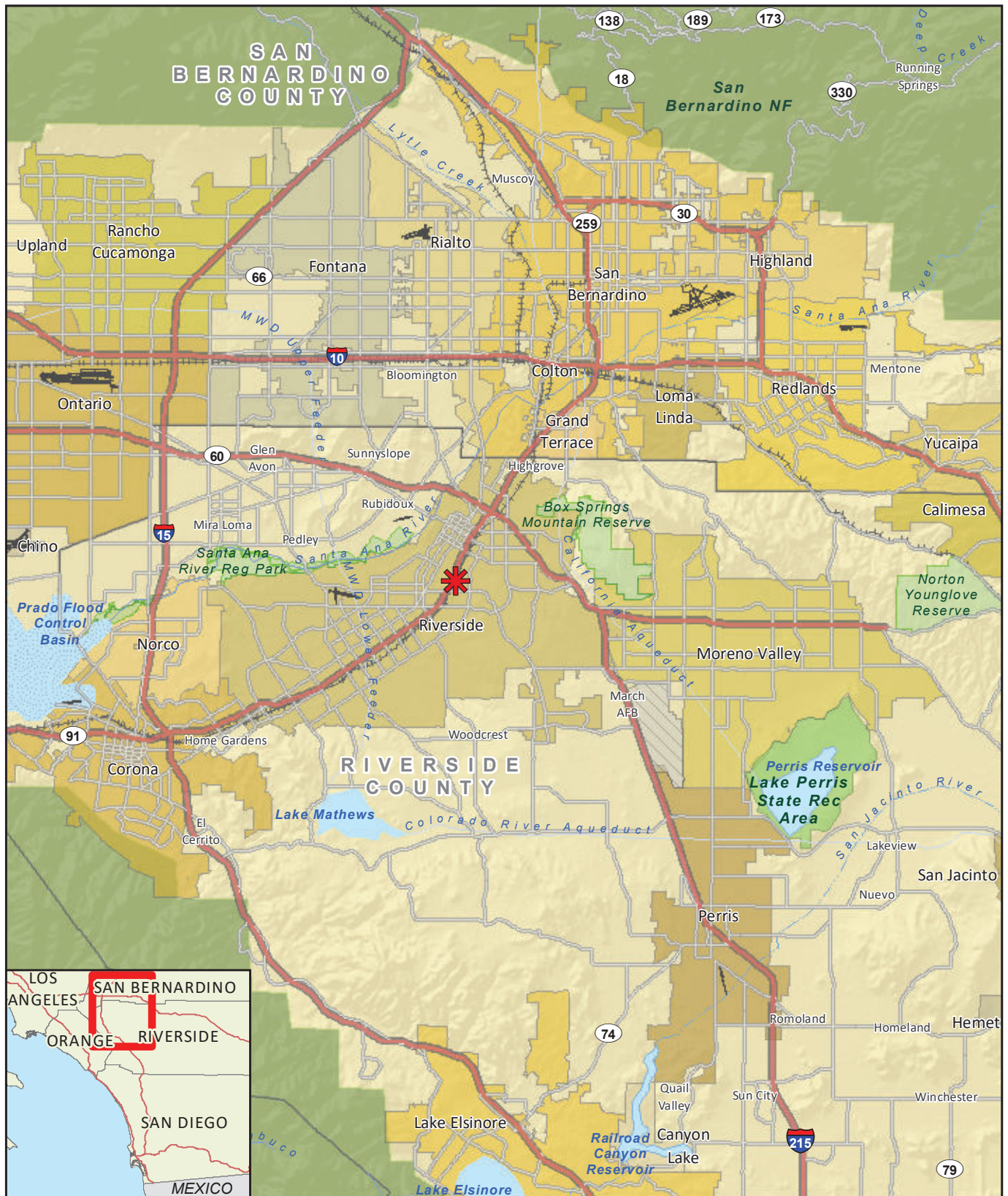
The following entitlements are proposed as part of the project:

- General Plan Amendment to amend 1.33 acres of the project site from LDR - Low Density Residential to C – Commercial;
- Zoning Code Amendment to rezone 1.40 acres from R-1-7000 - Single-Family Residential Zone to CG-CS Commercial General and Commercial Storage Overlay Zones;
- Design Review of project plans; and
- Variance to allow the use of a decorative wrought iron fence along the project's perimeter where a decorative masonry wall is required by the Zoning Code.

Architecturally, the proposed expansion would match the existing facility to the south in both color and material. Buildings would be constructed with light gauge steel framing and have a maximum height of 12 feet (one story). Existing fencing surrounding the project site includes 6-foot-high chain-link fencing and would be replaced with 6-foot-high ornamental aluminum fencing.

Vehicular access to the project site would be through the existing self-storage facility located south of the proposed expansion. Vehicles/moving trucks driving through the project site would access individual storage units, and roll-up doors. A new emergency exit is proposed at the north end of the project site connecting to Ivy Street. Additionally, the proposed project would require the extension of the existing irrigation system on the south property and electrical service for site lighting. The project does not propose the extension of existing walls or fences surrounding the site. The preliminary grading plan for the proposed project is shown on Figure 4.

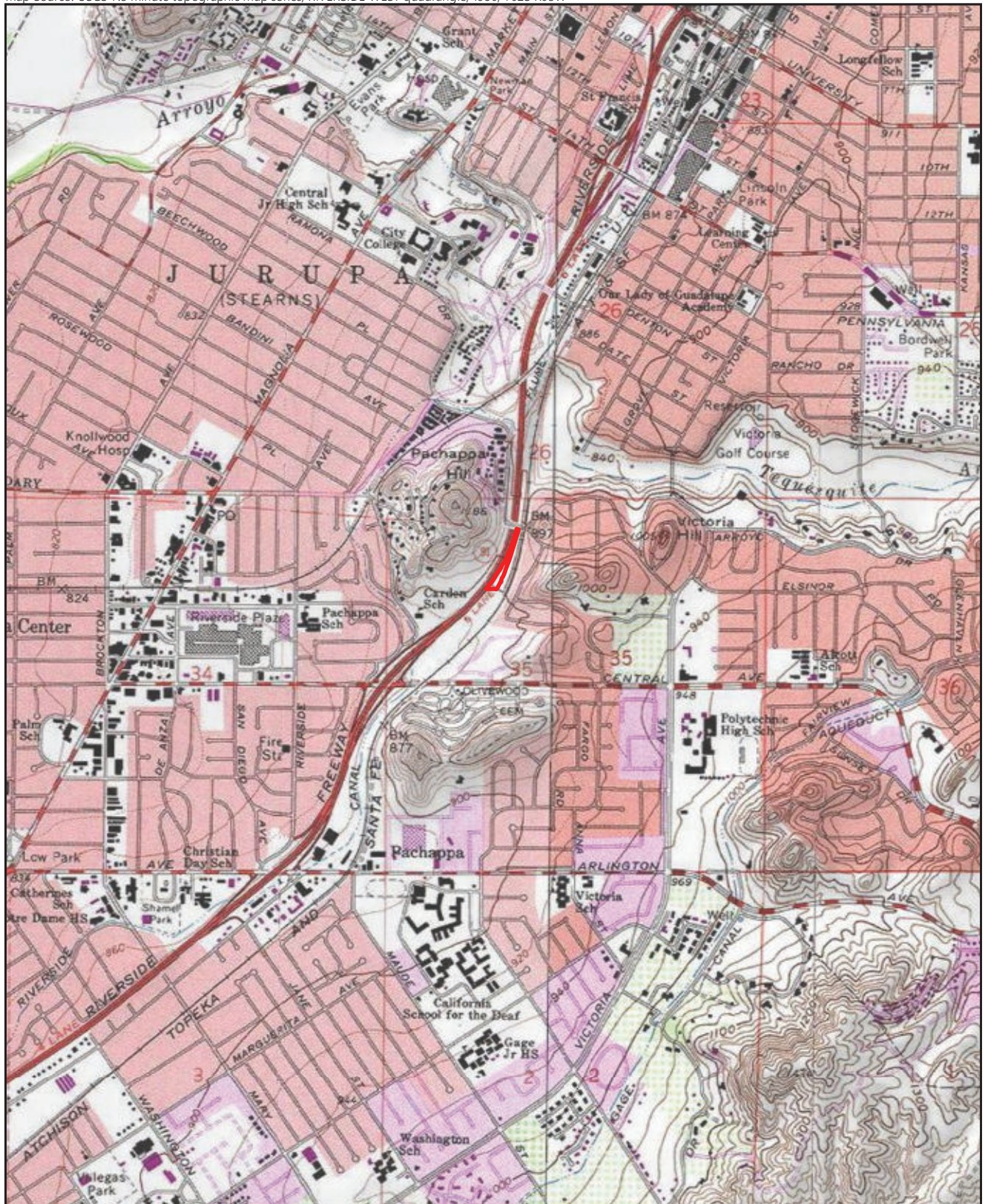
The self-storage facility main entry gate would be open from 5:00 A.M. – 9:00 A.M. seven days a week. While the office would be open Monday through Saturday from 9:00 A.M. – 6:00 P.M. and Sunday from 10:00 A.M. – 4:00 P.M.



 Project Location

FIGURE 1  
Regional Location





Project Boundary

RECON

M:\J:\2021-001120, B-1156-10, Millage and Negative Declaration

FIGURE 2  
Project Location on USGS Map





 Project Boundary

FIGURE 3  
Project Location on Aerial Photograph





**11. Surrounding land uses and setting: Briefly describe the project's surroundings:**

The 1.62-acre project site is currently vacant. The site contained a single-family residence that was demolished in 2009 to facilitate improvements to SR-91. SR-91 borders the site to the north and west, the BNSF Railroad borders the site to the east, and the existing self-storage facility borders the site to the south. The proposed project would accommodate an expansion of the existing self-storage facility.

	Existing Land Use	General Plan Designation	Zoning Designation
<b>Project Site</b>	Vacant	LDR - Low Density Residential	APN 219-270-006 - R-1-7000 - Single-Family Residential Zone  APN 223-050-009 – CG - Commercial General Zone
<b>North</b>	SR-91	n/a	n/a
<b>East</b>	BNSF Railroad	LDR - Low Density Residential	RWY - Railway Zone
<b>South</b>	Self Storage Facility	C - Commercial	CG - Commercial General
<b>West</b>	SR-91	n/a	n/a

**12. Other public agencies whose approval is required (e.g., permits, financial approval, or participation agreement.):**

- a. Riverside County Airport Land Use Commission (ALUC)

**13. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significant impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

RECON Environmental, Inc. contacted the Native American Heritage Commission on August 22, 2019, requesting a search of their Sacred Lands File for information on Native American cultural resources in or adjacent to the project area of potential effect (APE). A reply was received on September 19, 2019, stating that the search of the Sacred Lands Files was completed with negative results. In accordance with Senate Bill (SB) 18 and Assembly Bill (AB) 52 requirements, the City contacted Native American tribes who may also have knowledge of cultural resources in the project area. A total of five tribes responded and three tribes requested consultation including the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe.

**14. Other Environmental Reviews Incorporated by Reference in this Review:**

- a. General Plan 2025
- b. GP 2025 FPEIR

## 15. List of Attachments:

- 1: Air Quality and Greenhouse Gas Analysis for the Ivy Street Self Storage Expansion Project, RECON Environmental, Inc., October 17, 2019
- 2: Cultural Resources Survey for the Ivy Street Self Storage Expansion Project, RECON Environmental, Inc., October 28, 2019
- 3: Water Quality Management Plan, 2998 Ivy Street, Joseph E. Bonadiman & Assoc., Inc., August 2019
- 4: Noise Analysis for the Ivy Street Self Storage Expansion Project, RECON Environmental, Inc., August 18, 2020

## 16. Acronyms

AB	Assembly Bill
AQMP	Air Quality Management Plan
CEQA	California Environmental Quality Act
EOP	Emergency Operations Plan
FPEIR	GP 2025 Final Programmatic Environmental Impact Report
GHG	Greenhouse Gas
GP 2025	General Plan 2025
LHMP	Local Hazard Mitigation Plan
MSHCP	Multiple Species Habitat Conservation Plan
OEM	Office of Emergency Services
PEIR	Program Environmental Impact Report
RCALUCP	Riverside County Airport Land Use Compatibility Plan
SCAQMD	South Coast Air Quality Management District
SWPPP	Storm Water Pollution Prevention Plan
USGS	United States Geologic Survey
WMWD	Western Municipal Water District
WQMP	Water Quality Management Plan
ALUC	Airport Land Use Commission
APE	Area of potential effect
Caltrans	California Department of Transportation
FMMP	Farmland Mapping and Monitoring Program
SoCAB	South Coast Air Basin
AQMP	Air Quality Management Plan
CG	Commercial General
CAAQS	California Ambient Air Quality Standards
NAAQS	National Ambient Air Quality Standards
LST	localized significance thresholds
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
ROG	Reactive organic gases
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
USACE	United States Army Corps of Engineers
SKR	Stephen's Kangaroo Rat
HCP	Habitat Conservation Plan
CCR	California Code of Regulations
CALGreen	California Green Building Standards
RPU	Riverside Public Utilities
SCGC	Southern California Gas Company
CEC	California Energy Commission
MT CO <sub>2</sub> E	metric tons of carbon dioxide equivalent



CARB	California Air Resources Board
CAPCOA	California Air Pollution Control Officers Association
AB	Assembly Bill
SB	Senate Bill
BMP	Best Management Practice
MRZ	Mineral Resource Zone
dB(A)	A-weighted decibel
L <sub>eq</sub>	one-hour equivalent noise level
FHWA	Federal Highway Administration
ppv	peak particle velocity
in/sec	inch per second
LOS	Level of service
MS4	Municipal Separate Sewer Permit
VHFHSZ	Very High Fire Hazard Severity Zones
CALFIRE	California Department of Forestry and Fire

## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                      | <input type="checkbox"/> Agriculture & Forest Resources | <input type="checkbox"/> Air Quality                          |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" 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 checked="" type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities/Service Systems       | <input type="checkbox"/> Wildfire                       | <input type="checkbox"/> Mandatory Findings of Significance   |

## DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation which reflects the independent judgment of the City of Riverside, it is recommended that:

The City of Riverside finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. ☐

The City of Riverside finds 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. ☒

The City of Riverside finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. ☐

The City of Riverside finds that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document 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. ☐

The City of Riverside finds 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 \_\_\_\_\_

Printed Name & Title Brian Norton, Senior Planner

For City of Riverside





*ENVIRONMENTAL INITIAL STUDY*

**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 off-site 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: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than 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 Analyses,” as described in (5) below, may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. 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 measure 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 ordinances). 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) The explanation of each issue should identify:
  - a. the significance criteria or threshold, if any, used to evaluate each question; and
  - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS.</b> Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>1a. Response:</b> <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)</i></p> <p><b>Less Than Significant Impact.</b> The City’s General Plan 2025 Open Space and Conservation Element identifies scenic resources in the city and states that “the hillsides and ridgelines above Riverside offer scenic benefits to the community.” Notably, Box Springs Mountain, Mount Rubidoux, Arlington Mountain, Alessandro Heights, and the La Sierra/Norco Hills are scenic resources and offer scenic views in the city. The project site is not located near these scenic resources.</p> <p>The proposed project involved the expansion of an existing self-storage facility that is located within an urbanized area. SR-91 borders the site to the west, the BNSF Railroad borders the site to the east followed by residential homes, and the existing self-storage facility borders the site to the south. The proposed project would expand and reflect the existing self-storage facility south of the site. The project will be subject to design review by the City for compliance with the Citywide Design Guidelines. The City’s General Plan 2025 policies are aimed at balancing development interests with broader community preservation objectives. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista and impacts would be less than significant.</p>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>1b. Response:</b> <i>(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City’s Urban Forest Tree Policy Manual, Title 20 – Cultural Resources and, Title 19 – Article V – Chapter 19.100 – Residential Zones - RC Zone; Caltrans 2018)</i></p> <p><b>Less than Significant Impact.</b> The California Scenic Highway Program by the California Department of Transportation (Caltrans) classifies highways meeting specific criteria as “scenic” throughout the state. The purpose of the program is to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. According to Caltrans, “a highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler’s enjoyment of the view” (Caltrans 2018). SR-91, located west of the project site, is designated as an eligible state scenic highway. Because SR-91 is not officially designated as a state scenic highway and no rock outcroppings or historic buildings are on or near the project site, no impacts to scenic resources would occur. Therefore, impacts would be less than significant.</p>				
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site the site and its surroundings? (Public views are those that are experienced from a 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"/>



ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>1c. Response:</b> <i>(Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)</i></p> <p><b>Less than Significant Impact.</b> The proposed project is a self-storage facility located within a long and narrow graded vacant lot adjacent to the SR-91 freeway and a rail line. The storage facility would be an extension of the existing storage facility located south of the project site.</p> <p>The proposed project site and surrounding area are highly urbanized. The project will comply with all the design requirements of the Zoning Code and the Citywide Design Guidelines to assure quality site design and building architecture that is of high quality. This includes installation of landscaping, articulated and decorative screening walls and façades, window fenestration and varying roof design, consistent with the Citywide Design Guidelines. Thus, impacts on the visual character and quality of the area would be less than significant.</p>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>1d. Response:</b> <i>(Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)</i></p> <p><b>Less than Significant Impact.</b> The project site is located in an area that is already subject to nighttime lighting from vehicles on SR-91 to the west, trains on the BNSF Railroad and exterior residential lights to the east, and outdoor security lighting at the existing self-storage facility to the south. New sources of light and glare during project construction would primarily be for security purposes and would be temporary; this lighting would cease upon construction completion. As shown in the photometric plans (Figure 5), new operational light sources would be similar to existing light sources at the self-storage facility south of the site. All light would drop to 0.0FC at the property lines.</p> <p>No light-sensitive uses are adjacent to the project site. Existing residential uses east of the project site are physically separated from the site by the BNSF Railroad and would not be subject to light spillover from on-site lighting.</p> <p>The project site is also located outside the Mount Palomar Policy Area (Figure 5.1-2, City of Riverside General Plan PEIR, 2007). Thus, the project would not affect nighttime observations from the Mount Palomar Observatory. Therefore, less than significant impacts related to new light sources would occur.</p>				

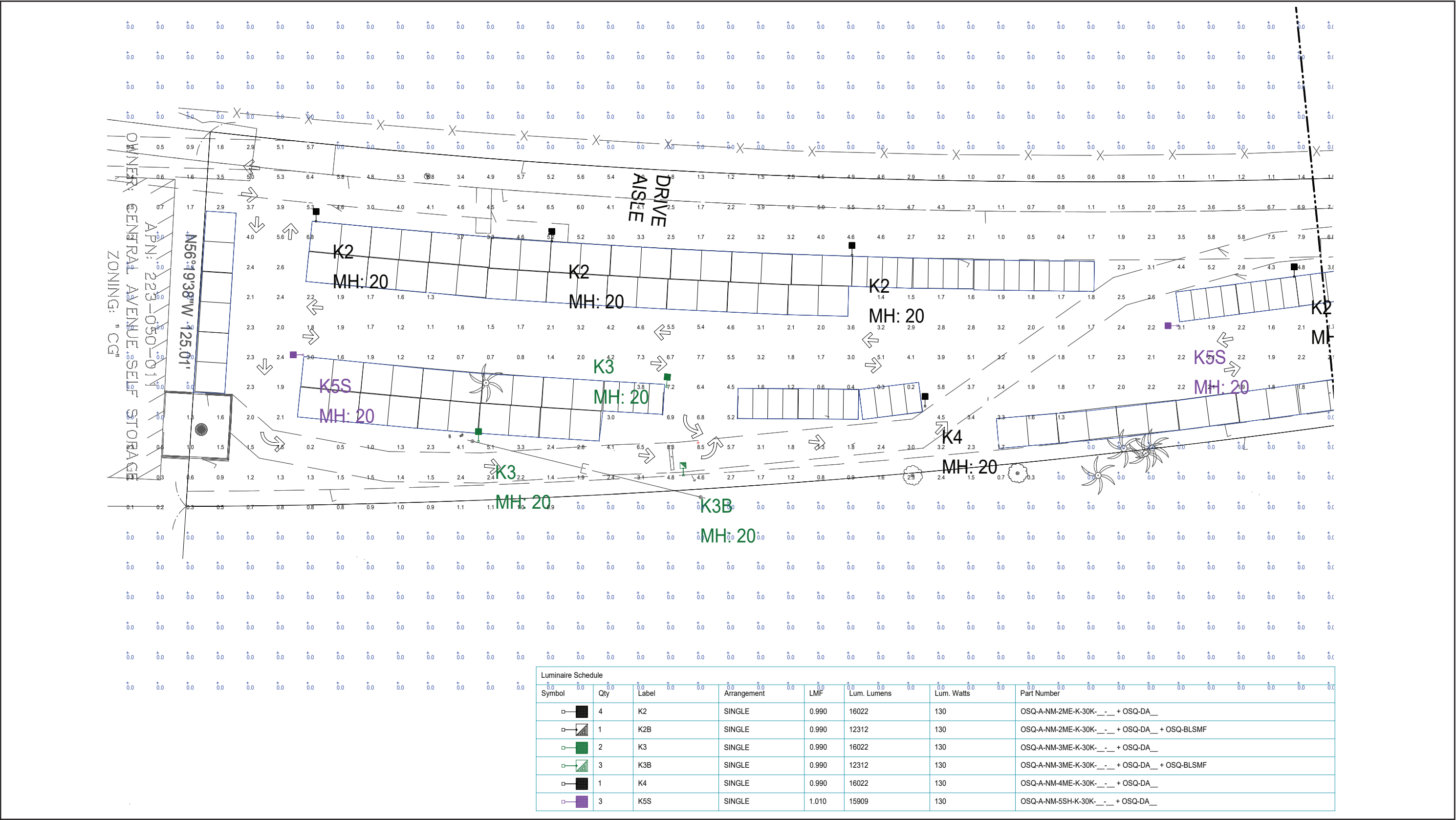


FIGURE 5a  
Photometric Plans



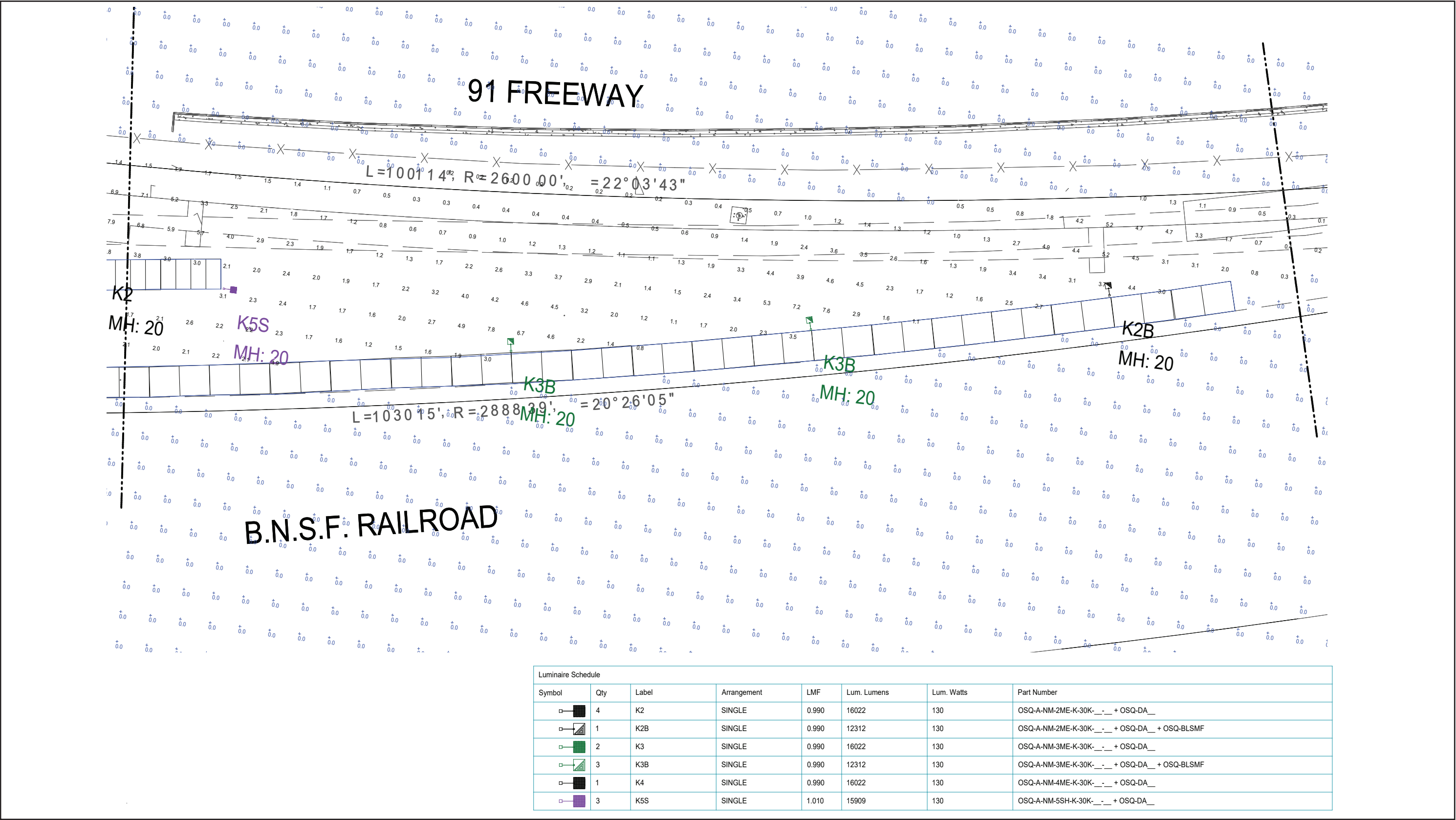


FIGURE 5b  
Photometric Plans

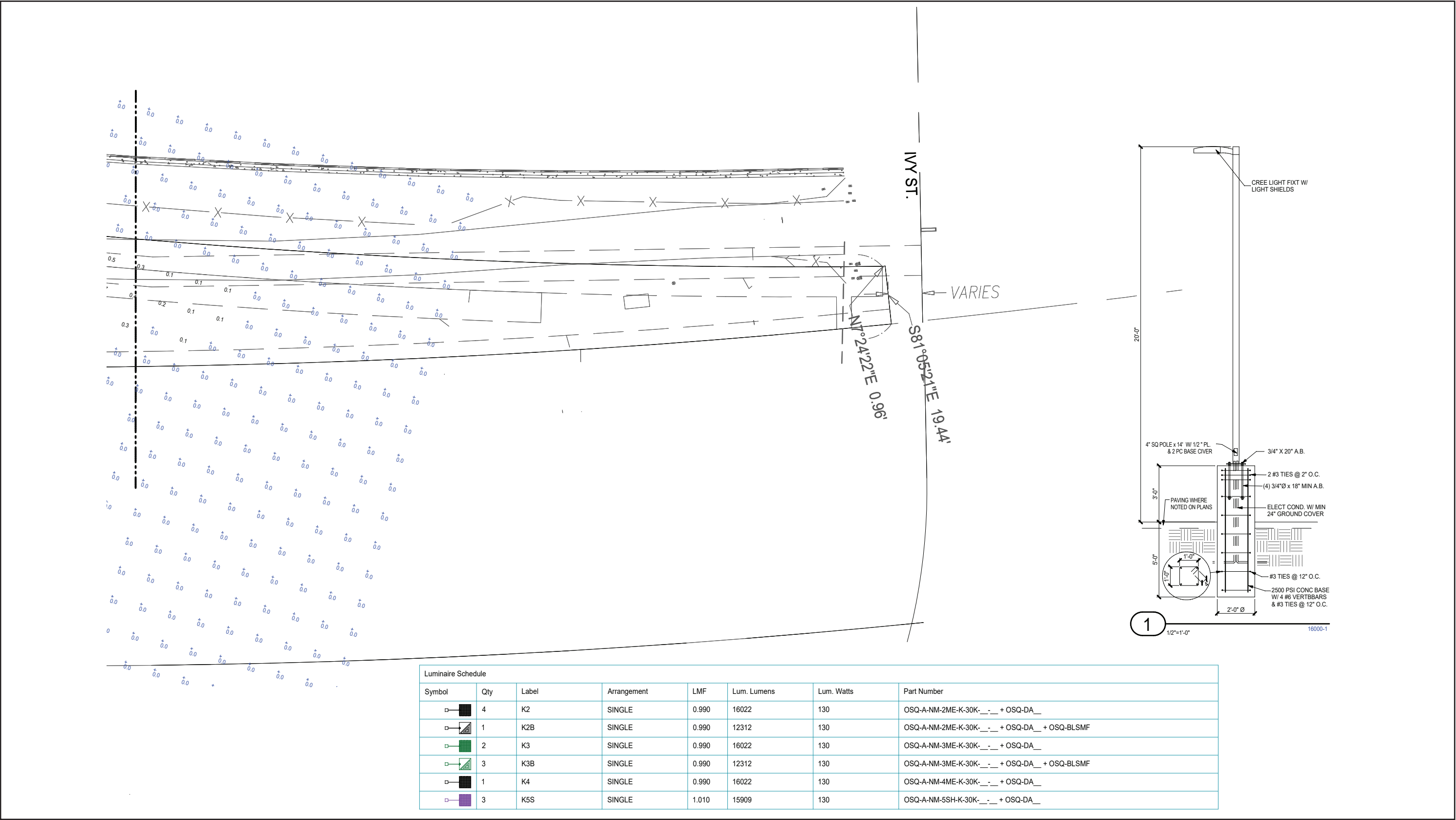


FIGURE 5c  
Photometric Plans

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>2. AGRICULTURE AND FOREST RESOURCES:</b>				
<p>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 the Forest Protocols adopted by the California Air Resources Board. Would the project:</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2a. Response:</b> (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability &amp; General Plan 2025 FPEIR – Appendix I – Designated Farmland Table, California Department of Conservation, Farmland Mapping and Monitoring Program [FMMP])</p> <p><b>No Impact.</b> The California Department of Conservation administers the FMMP pursuant to Section 65570 of the California Government Code. Under the FMMP, the project site and the adjacent developed areas are designated as Urban and Built-Up Land. No Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance is located on or near the site. The project site and the surrounding area are not subject to agricultural activities. Rather, the project site is located within an urbanized area and is an expansion of the self-storage facility located south of the site. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the site is not designated as, and is not adjacent to, the Arlanza-La Sierra Agricultural Area or the Arlington Heights Greenbelt nor is it adjacent to land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the proposed project would have no impact on Farmland or agricultural uses.</p>				
<p>b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2b. Response:</b> (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)</p> <p><b>No Impact.</b> The project site is currently zoned CG (Commercial General) and R-1-7000 (Single-Family Residential), which does not allow agricultural uses. The project would require a rezone the project site to CG-CS - Commercial General and Commercial Storage Overlay Zones, which would not allow agricultural uses. Areas near the project site are also not permitted to support agricultural uses under their current zoning designations. As shown in Figure OS-3 in the General Plan (2025), the project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act Contract. Therefore, no impacts would occur.</p>				
<p>c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) timberland (as defined in Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2c. Response:</b> (Source: U.S. Forest Service (USFS). National Forest Locator Map, California Department of Conservation, FMMP)</p> <p><b>No Impact.</b> According to the FMMP, the project site is designated as Urban and Built up Land. The site does not support agricultural resources or operations and is not designated as Prime Farmland, Farmland of Statewide Importance, Unique</p>				



ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Farmland, or Farmland of Local Importance. In addition, the site has no agricultural resource or operation, including farmland adjacent to the site.</p> <p>The project site currently contains ornamental trees. The project site and surrounding areas do not support trees that may be considered a forest. Therefore, the proposed project would not affect or convert forest land to other uses. Thus, no impacts would occur in regards to the conversion of farmland to non-agricultural use or to the loss of forest land.</p>				
<p>d. Result in the loss of forest land or conversion of forest land to non-forest use?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2d. Response:</b> (Source: U.S. Forest Service (USFS). National Forest Locator Map)</p> <p><b>No Impact.</b> See response to 2c above.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>2e. Response:</b> (Source: U.S. Forest Service (USFS). National Forest Locator Map, California Department of Conservation, FMMP)</p> <p><b>No Impact.</b> See response to 2c above.</p>				
<p><b>3. AIR QUALITY.</b></p>				
<p>Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
<p>a. Conflict with or obstruct implementation of the applicable air quality plan?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>3a. Response:</b> (Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019)</p> <p>An Air Quality and Greenhouse Gas (GHG) Analysis was prepared for the project by RECON Environmental and can be found as Attachment 1.</p> <p><b>No Impact.</b> As described in the Air Quality and GHG Analysis, the South Coast Air Basin (SoCAB) is designated as in attainment or unclassifiable attainment (expected to be meeting the standard despite a lack of monitoring data) for all federal air quality standards except for the 8-hour ozone and PM<sub>2.5</sub> (particulate matter less than 2.5 microns in diameter) standards. The SoCAB is also designated as in nonattainment for state air quality standards for 8-hour ozone and PM<sub>2.5</sub>, and additionally is in nonattainment of state PM<sub>10</sub> standards. The regional air quality plan, the 2016 Air Quality Management Plan (AQMP), outlines measures to reduce emissions of ozone and PM<sub>2.5</sub>. Whereas reducing particulate matter concentrations is achieved by reducing emissions of PM<sub>2.5</sub> to the atmosphere, reducing ozone concentrations is achieved by reducing the precursors of photochemical formation of ozone, volatile organic compounds, and oxides of nitrogen (NO<sub>x</sub>).</p> <p>The growth forecasting for the AQMP is based in part on the land uses established by local general plans. Thus, if a project is consistent with land use as designated in the local general plan, it can normally be considered consistent with the AQMP. Projects that propose a different land use than is identified in the local general plan may also be considered consistent with the AQMP if the proposed land use is less intensive than buildout under the current designation. For projects that propose a land use that is more intensive than the current designation, analysis that is more detailed is required to assess conformance with the AQMP.</p> <p>The small southeast corner of the project site is designated as Commercial and is zoned CG (Commercial General), and the remaining majority of the project site is designated as Low Density Residential and is zoned R-1-7000 (Single-Family Residential). The project would require a rezone of a majority of the project site to CG (Commercial General). However,</p>				

because the project is an expansion to an existing self-storage facility and does not include a residential component, the project would not increase growth in the region. The project would not exceed the growth assumptions of the 2016 AQMP.

Another factor used to determine if a project would conflict with implementation of the AQMP is determining if the project would result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay the timely attainment of air quality standards (National Ambient Air Quality Standards [NAAQS] and California Ambient Air Quality Standards [CAAQS]) or interim emissions reductions specified in the AQMP. NAAQS and CAAQS violations could occur if project emissions would exceed regional significance thresholds or localized significance thresholds (LSTs). As shown in Tables 1 and 2, construction and operational emissions would be less than the regional significance thresholds. Additionally, as shown in Tables 3 and 4, construction and operational emissions would be less than the LSTs. Therefore, the project would not result in an air quality violation and the project would not conflict with or obstruct the implementation of the AQMP or applicable portions of the SIP. No impacts would occur.

<b>Table 1</b> <b>Summary of Project Construction Emissions</b> <b>(pounds per day)</b>						
Construction	Pollutant					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Site Preparation	2	18	8	<1	7	4
Grading	1	15	7	<1	6	3
Building Construction	2	15	13	<1	1	1
Paving	1	8	9	<1	1	<1
Architectural Coatings	5	2	2	<1	<1	<1
<b>Maximum Daily Emissions</b>	<b>5</b>	<b>18</b>	<b>13</b>	<b>&lt;1</b>	<b>7</b>	<b>4</b>
<i>SCAQMD Regional Threshold</i>	<i>75</i>	<i>100</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
SOURCE: Attachment 1						

<b>Table 2</b> <b>Summary of Project Operational Emissions</b> <b>(pounds per day)</b>						
Source	Pollutant					
	ROG	NO <sub>x</sub>	CO	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Area Sources	<1	<1	<1	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	<1	<1	1	<1	<1	<1
<b>Total</b>	<b>&lt;1</b>	<b>&lt;1</b>	<b>1</b>	<b>&lt;1</b>	<b>&lt;1</b>	<b>&lt;1</b>
<i>Significance Threshold</i>	<i>55</i>	<i>55</i>	<i>550</i>	<i>150</i>	<i>150</i>	<i>55</i>
<i>Exceed Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
SOURCE: Attachment 1						

<b>Table 3</b> <b>Localized Construction Emissions</b>				
	Pollutant			
	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Maximum Daily On-Site Emission	13.2	18.3	6.6	3.7
<i>LST Threshold</i>	<i>883</i>	<i>170</i>	<i>7</i>	<i>4</i>
Threshold Exceeded?	No	No	No	No
SOURCE: Attachment 1				

<b>Table 4</b> <b>Localized Operational Emissions</b>				
	Pollutant			
	CO	NO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
On-Site Area and Energy Sources	<1	<1	<1	<1
<i>LST Threshold</i>	<i>883</i>	<i>170</i>	<i>2</i>	<i>1</i>
Threshold Exceeded?	No	No	No	No
SOURCE: Attachment 1				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact																
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 checked="" type="checkbox"/>	<input type="checkbox"/>																
<p><b>3b. Response:</b> <i>(Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019)</i></p> <p><b>Less than Significant Impact.</b> The SoCAB is classified as in attainment for all criterion pollutants except for ozone, PM<sub>10</sub> (particulate matter less than 10 microns in diameter), and PM<sub>2.5</sub>. The SoCAB is designated as a nonattainment area for federal AAQS for the 8-hour ozone and PM<sub>2.5</sub> standards, and is in nonattainment area under state PM<sub>10</sub> standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. NOx and reactive organic gases (ROG) are known as the chief “precursors” of ozone. These compounds react in the presence of sunlight to produce ozone.</p> <p>As shown in Tables 1 and 2, emissions of ozone precursors (ROG and NOx), PM<sub>10</sub>, and PM<sub>2.5</sub> from construction and operation would be below the South Coast Air Quality Management District’s (SCAQMD) thresholds of significance. These thresholds are designed to provide limits below which project emissions from an individual project would not significantly affect regional air quality or the timely attainment of the NAAQS and CAAQS. Therefore, the project would not result in a cumulatively considerable net increase in emissions of ozone, PM<sub>10</sub>, or PM<sub>2.5</sub>, and impacts would be less than significant.</p>																				
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>																
<p><b>3c. Response:</b> <i>(Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019)</i></p> <p><b>No Impact.</b> A sensitive receptor is a person in the population who is more susceptible to health effects due to exposure to an air contaminant than is the population at large. Examples of sensitive receptor locations in the community include residences, schools, playgrounds, childcare centers, churches, athletic facilities, retirement homes, and long-term health care facilities. The sensitive receptors nearest to the project site include residential uses east of the project site.</p> <p>Results of the LST analysis indicate that the project would not exceed the SCAQMD LSTs during construction (see Table 3). Results of the LST analysis also indicate that the project would not exceed the SCAQMD LSTs during operational activity (see Table 4). Therefore, sensitive receptors would not be exposed to substantial pollutant concentrations during project construction or operation. No impacts would occur.</p>																				
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																
<p><b>3d. Response:</b> <i>(Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019, Bay Area Air Quality Management District 2010)</i></p> <p><b>Less than Significant Impact.</b> During construction, diesel equipment may generate some nuisance odors. Sensitive receptors near the project site include residential uses to the east of the project site; however, exposure to odors associated with project construction would be short term and temporary in nature. Construction odor impacts would be less than significant.</p> <p>The following list provides some common types of facilities that are known producers of objectionable odors (Bay Area Air Quality Management District 2010). This list of facilities is not meant to be all-inclusive.</p> <table border="0" data-bbox="162 1659 1380 1932"> <tr> <td>• Wastewater Treatment Plant</td> <td>• Wastewater Pumping Facilities</td> </tr> <tr> <td>• Sanitary Landfill</td> <td>• Transfer Station</td> </tr> <tr> <td>• Composting Facility</td> <td>• Petroleum Refinery</td> </tr> <tr> <td>• Asphalt Batch Plant</td> <td>• Chemical Manufacturing</td> </tr> <tr> <td>• Fiberglass Manufacturing</td> <td>• Painting/Coating Operations</td> </tr> <tr> <td>• Rendering Plant</td> <td>• Coffee Roaster</td> </tr> <tr> <td>• Food Processing Facility</td> <td>• Confined Animal Facility/Feed Lot/Dairy</td> </tr> <tr> <td>• Green Waste and Recycling Operations</td> <td>• Metal Smelting Plants</td> </tr> </table>					• Wastewater Treatment Plant	• Wastewater Pumping Facilities	• Sanitary Landfill	• Transfer Station	• Composting Facility	• Petroleum Refinery	• Asphalt Batch Plant	• Chemical Manufacturing	• Fiberglass Manufacturing	• Painting/Coating Operations	• Rendering Plant	• Coffee Roaster	• Food Processing Facility	• Confined Animal Facility/Feed Lot/Dairy	• Green Waste and Recycling Operations	• Metal Smelting Plants
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ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The project does not include any of these uses that are typically associated with odor complaints. The project does not propose any uses or activities that would result in potentially significant operational-source odor impacts. Additionally, SCAQMD Rule 402 acts to prevent occurrences of odor nuisances. The project is not expected to generate significant objectionable odors affecting a substantial number of people. Impacts would be less than significant.</p>				
<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>4a. Response:</b> <i>(Source: General Plan 2025 – Figure OS-6 – Stephen’s Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Figure OS-7 – Multiple Species Habitat Conservation Plan (MSHCP) Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area)</i></p> <p><b>Less than Significant Impact with Mitigation.</b> The project site is located on a previously disturbed and vacant site within an urbanized area. Mature ornamental landscaping is present, including approximately 10 mature palm trees, which may provide habitat for nesting birds. As a standard practice, a condition of approval (Mitigation Measure BIO-1) will be required specifying that, in the event that vegetation clearing is necessary during the nesting season, a qualified biologist shall conduct a preconstruction survey to identify the locations of nests within the areas affected by clearing activities. An exclusionary zone shall be established around any active nest. The dimensions of the zone shall be determined by a qualified biologist and is dependent on the species of bird detected. This zone shall be clearly marked in the field, and construction or clearing shall not be conducted within this zone until the biologist determines the nest is no longer active. With the above noted condition of approval (Mitigation Measure BIO-1) in place, a less than significant impact directly, indirectly and cumulatively will occur to federally endangered threatened, or rare species or their habitats.</p>				
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 U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>4b. Response:</b> <i>(Source: General Plan 2025 – Figure OS-6 –SKR Core Reserve and Other HCP, Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Figure 5.4-4 - MSHCP Criteria Cells and Subunit Areas, Figure 5.4-6 – MSHCP Narrow Endemic Plant Species Survey Area, Figure 5.4-7 – MSHCP Criteria Area Species Survey Area, Figure 5.4-8 – MSHCP Burrowing Owl Survey Area, MSHCP Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools)</i></p> <p><b>No Impact.</b> The project site is located on a highly disturbed site within an urbanized area of the city where no riparian habitat or other sensitive natural community exists. The site is also not located in an area the Riverside General Plan has identified as an arroyo, open water, vernal pool, riparian forest, riparian scrub, or other natural community. Further, the surrounding area has been developed for many years; and a long history of disturbance exists in the area, such that there is little chance that any riparian habitat could have persisted. Therefore, the proposed project would have no impact 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 (CDFW) or United States Fish and Wildlife Service (USFWS) directly, indirectly, and cumulatively.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
<b>4c. Response: (Source: General Plan 2025 – Figure OS 8.1)</b> <b>No Impact.</b> Figure OS 8.1 - Rivers, Creeks and Streams in the Open Space and Conservation Element of the General Plan shows that the site is not located near the Santa Ana River, Arlington Canal, Temescal Creek, or other blueline streams in and near the City. The USFWS National Wetlands Inventory and United States Geological Survey (USGS) National Map Viewer do not show blueline streams, wetlands, riparian areas, or riparian mapping areas on the project site or near the site. No state or federally protected wetlands, (including, but not limited to, marsh, vernal pool, coastal, etc.), are on or near the site. The project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and, thus, does not include United States Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. Therefore, the proposed project would have no impact to state or federally protected wetlands directly, indirectly, and cumulatively.				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
<b>4d. Response: (Source: MSHCP, General Plan 2025 – Figure OS-7 – MSHCP Cores and Linkage)</b> <b>No Impact.</b> The project site is within an urbanized area; is surrounded by existing urban developments including SR-91 to the west, the BNSF Railroad to the east, Ivy Street to the north, and the existing self-storage facility to the south; and is not located within any Western Riverside County MSHCP Criteria Cells, Cores, or Linkages. The project site is also not located near the Sycamore Canyon Wilderness Park or the Box Springs Mountain Regional Park, between Box Springs Mountain Reserve and the Santa Ana River via Springbrook Wash, or between the Santa Ana River and La Sierra/Norco Hills, which all serve as wildlife corridors in the City. In addition, the site is not located near the Tequesquite, Prenda, or Alessandro arroyos, which are also considered valuable wildlife corridors in the city. The site is not adjacent to large open space areas and water bodies that support wildlife movement. Thus, the proposed project would not result in a barrier to the movement of any native resident or migratory fish or wildlife species or within established native resident or migratory wildlife corridors, nor impede the use of native wildlife nursery sites. Therefore, the proposed project would have no impact to wildlife movement directly, indirectly, and cumulatively.				
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"/>
<b>4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual)</b> <b>No Impact.</b> Implementation of the proposed project is subject to all applicable federal, state, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees. This project has been reviewed against these policies and found to be in compliance with the policies. Thus, no impacts would occur.				
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"/>
<b>4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – SKR Core Reserve and Other HCP, SKR HCP, Lake Mathews MSHCP and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan)</b> <b>No Impact.</b> The project is located on a vacant site, in an urbanized area that has been previously graded and will not affect existing Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans directly, indirectly, or cumulatively. Therefore, the project will have no impact on the provisions				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.				
<b><u>Mitigation Measure</u></b>				
<b>BIO-1:</b> In the event that vegetation clearing is necessary during the bird nesting season (February 1 – September 15), a qualified biologist shall conduct a preconstruction survey to identify the locations of nests within the areas affected by clearing activities. An exclusionary zone shall be established around any active nest. The dimensions of the zone shall be determined by a qualified biologist and is dependent on the species of bird detected. This zone shall be clearly marked in the field, and construction or clearing shall not be conducted within this zone until the biologist determines the nest is no longer active.				
<b>5. CULTURAL RESOURCES.</b> Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>5a. Response: (Source: Cultural Resources Survey prepared by RECON Environmental on October 28, 2019)</b> <b>No Impact.</b> According to the Cultural Resources Survey (RECON 2019, Attachment 2), one historical resource (P-33-12837), 2998 Ivy Street, was previously recorded within the project APE. P-33-12837 is no longer extant; only several ornamental landscaping elements remain. No previously unrecorded cultural resources were observed within the APE during the survey. Therefore, project design would not result in impacts to any known historical resources.				
b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>5b. Response: (Source: Cultural Resources Survey prepared by RECON Environmental on October 28, 2019)</b> <b>Less than Significant Impact with Mitigation.</b> According to the Cultural Resources Survey (RECON 2019), no significant prehistoric cultural resources were found during the survey of the project property. No prehistoric cultural resources were mapped on or immediately adjacent to the property in the record search files. Therefore, the proposed project will have no impact on known prehistoric cultural resources. Additionally, in accordance with SB 18 and AB 52 requirements, the City contacted Native American tribes who may also have knowledge of cultural resources in the project area. A total of five tribes responded and three tribes requested consultation including the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe. Native American representatives from these tribes have requested implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4, which outline monitoring and treatment during the course of grading for the project. Therefore, implementation of Mitigation Measures CUL-1 through CUL-4 would reduce any potentially significant impacts regarding unknown tribal resources to less than significant.				
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>5c. Response: (Source: Cultural Resources Survey prepared by RECON Environmental on October 28, 2019)</b> <b>Less than Significant Impact.</b> According to State Health and Safety Code Section 7050.5, in the event that human remains (or remains that may be human) are discovered at the implementing development project site during grading or earthmoving, the construction contractors shall immediately stop all activities in the immediate area of the find. The project proponent shall then inform the Riverside County Coroner and the City of Riverside Planning Division, and the coroner would be permitted to examine the remains. If the coroner determines that the remains are of Native American origin, the coroner would notify the Native American Heritage Commission and the Commission would identify the “Most Likely Descendent.” Thus, project adherence to state regulations would ensure impacts would be less than significant.				
<b><u>Mitigation Measures</u></b>  CUL-1: Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional				



<b>ISSUES (AND SUPPORTING FORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
<p>consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.</p> <p>CUL-2: Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.</p> <ol style="list-style-type: none"> <li>1. The project archaeologist, in consultation with consulting tribes, the developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: <ol style="list-style-type: none"> <li>a. Project grading and development scheduling;</li> <li>b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;</li> <li>c. The protocols and stipulations that the applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;</li> <li>d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and</li> <li>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure.</li> </ol> </li> </ol> <p>CUL-3: Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the City evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li>2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on-site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and</li> <li>3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community and Economic Development Department with evidence of same:</li> </ol>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</p> <p>b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 Code of Federal Regulations (CFR) Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;</p> <p>c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and</p> <p>At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.</p> <p>CUL-4: Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.</p>				
<p><b>6. ENERGY</b> Would the project:</p>				
<p>a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>6a. Response:</b> (<i>Source: California Code of Regulations (CCR) – Part 6, 2016 California Green Building Standards Code (CALGreen Code) (24 CCR, Part 11)</i>)</p> <p><b>Less than Significant Impact.</b> The Riverside Public Utilities (RPU) and the Southern California Gas Company (SCGC) are utility companies that currently provide and would continue to provide electrical and natural gas services to the project site. The City of Riverside has made energy efficiency and conservation a priority. The Open Space and Conservation Element of the General Plan, the Green Action Plan and the Economic Prosperity Action Plan and Climate Action Plan details goals and measures adopted by the City to reduce and conserve energy.</p> <p>The State of California has adopted efficiency design standards within the Title 24 Building Standards and CALGreen requirements. Title 24 of the CCR, specifically Part 6, is California's Energy Efficiency Standards for Residential and Non-residential Buildings. Title 24 was established by the California Energy Commission (CEC) in 1978 in response to a legislative mandate to create uniform building codes to reduce California's energy consumption and to provide energy efficiency standards for residential and non-residential buildings. The 2016 Title 24 energy are the currently mandated building standards. The upcoming 2019 Title 24 Building Standards become effective for projects that obtain their building permits on or after January 1, 2020.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The 2016 CALGreen Standards Code (24 CCR 11), also known as the CALGreen Code, contains mandatory requirements for new residential and nonresidential buildings throughout California. The development of the CALGreen Code is intended to (1) cause a reduction in GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; (3) reduce energy and water consumption; and (4) respond to the directives by the Governor. The Code is established to reduce construction waste; make buildings more efficient in the use of materials and energy; and reduce environmental impacts during and after construction. The proposed project is required to be consistent with these objectives and policies.</p>				
<p><u>Construction</u></p> <p>Project construction would require the use of construction equipment for building activities. All off-road construction equipment is assumed to use diesel fuel. Construction also includes construction worker's vehicular trips traveling to and from the project site. Fuel energy consumed during construction would be temporary and would not represent a significant demand on energy resources. Furthermore, there are no unusual project characteristics that would necessitate the use of construction equipment that would be less energy-efficient than comparable construction sites in other parts of the state. Energy used in the construction of the project would enable the development of buildings that meet the latest energy efficiency standards as detailed in California's Title 24 building standards. Therefore, the proposed construction activities would not result in inefficient, wasteful, or unnecessary fuel consumption.</p>				
<p><u>Operation</u></p> <p>The proposed project would promote building energy efficiency through compliance with energy efficiency standards (2016 Title 24 and CALGreen). The project structures would also comply with the requirements of the state's Title 24 and CALGreen requirements which reduce electrical, heating, solid waste disposal and water demands. Therefore, the proposed project would not result in an inefficient, wasteful, or unnecessary consumption of energy. Impacts would be less than significant.</p>				
<p>b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>6b. Response:</b> <i>(Source: CCR – Part 6, 2016 CALGreen Code (24 CCR, Part 11), General Plan 2025 – Open Space and Conservation Element)</i></p> <p><b>Less than Significant Impact.</b> The project would be required to comply with the State of California's Title 24 Building Standards and CALGreen requirements for energy efficiency. As such, the project would be consistent with the energy efficiency and transportation goals established within the City's Open Space and Conservation Element, Green Action Plan, and Economic Prosperity Action Plan and Climate Action Plan. Because the project complies with the latest applicable energy efficiency standards, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and impacts would be less than significant.</p>				
<p><b>7. GEOLOGY AND SOILS.</b></p> <p>Would the project:</p>				
<p>a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:</p>				
<p>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.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>7i. Response:</b> <i>(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones)</i></p> <p><b>No Impact.</b> Seismic activity is to be expected in southern California; however, there are no Alquist-Priolo zones in the project area. The project site does not contain any known fault lines and the potential for fault rupture or seismic shaking is low. Compliance with the California Building Code regulations will ensure that no impacts related to strong seismic ground would occur.</p>				



ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>7ii. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones)</p> <p><b>Less than Significant Impact.</b> Just like most of southern California, in the event of an earthquake strong ground shaking is expected to occur on the project site. The proposed development lies outside of any Alquist-Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered very remote. The site is located in an area of high regional seismicity and the San Jacinto fault is located approximately 8 miles northeast from the site. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. As previously described, design and construction would comply with current building codes and standards which would reduce the risk of loss, injury, or death resulting from strong ground-shaking. Impacts would be less than significant.</p>				
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>7iii. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential)</p> <p><b>Less than Significant Impact.</b> According to the General Plan 2025 Liquefaction Zones Map – Figure PS-2, the project site is located in an area with low potential for liquefaction. In addition, according to the General Plan 2025 Soils with High Shrink-Swell Potential Map – Figure PS-3, the project site is not located in an area with soils of high shrink-swell potential. Project compliance with California Building Code regulations would ensure that site impacts related to the low potential for liquefaction, are reduced to less than significant impact levels.</p>				
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>7iv. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-1)</p> <p><b>No Impact.</b> Factors contributing to the stability of slopes include slope height and steepness, engineering characteristics of the earth materials comprising the slope, and intensity of ground shaking. Per Figure 5.6-1 of the General Plan 2025 Program Final PEIR, the project site and its surroundings have generally flat topography and are not located in an area prone to landslides. Thus, no impacts would occur related to landslides.</p>				
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>7b. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 18 – Subdivision Code, Title 17 – Grading Code, and Storm Water Pollution Prevention Plan [SWPPP])</p> <p><b>Less than Significant Impact.</b> Erosion and loss of topsoil could occur as a result of the project. State and federal requirements call for the preparation and implementation of a SWPPP establishing erosion and sediment controls for construction activities. The project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, with the erosion control standards for which all development activity must comply, the Grading Code (Title 17) also requires the implementation of measures designed to minimize soil erosion. Compliance with State and Federal requirements as well as with Title 17 will ensure that soil erosion or loss of topsoil will be less than significant impact.</p>				
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 off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>7c. Response:</b> (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 - Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)</p> <p><b>Less than Significant Impact.</b> As described previously in this section, on-site soils are not considered susceptible to landslides or liquefaction. In the absence of a shallow groundwater table, lateral spreading is also considered unlikely. Compliance with the City’s codes and the policies and the project-specific recommendations contained in the geotechnical study will ensure that impacts related to geologic conditions are reduced to less than significant impacts level.</p>				

<b>ISSUES (AND SUPPORTING FORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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 type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>7d. Response:</b> (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E – Geotechnical Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)</p> <p><b>No Impact.</b> Expansive soils, defined under California Building Code, expand when wet and shrink when dry. The amount and type of clay present in soil determines its shrink-swell potential. According to Figure 5.6-5 of the General Plan 2025 Program Final PEIR, the project site does not contain soils with high-shrink potential. Therefore, the project site does not have expansive soils and there will be no impact.</p>				
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"/>
<p><b>7e. Response:</b> (Source: Preliminary Grading Plan)</p> <p><b>No Impact.</b> The proposed project will not require septic tanks and will be served by sewer infrastructure. No impacts would occur.</p>				
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"/>
<p><b>7f. Response:</b> (Source: General Plan 2025 Policy HP-1.3; GP 2025 FPEIR Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity)</p> <p><b>Less than Significant Impact.</b> According to the General Plan 2025 FPEIR, the project site is located in an area with medium prehistoric cultural resource sensitivity. However, the entire project site has been previously disturbed with grading associated with the development of the railroad and the railroad right of way and adjacent infrastructure. Thus, impacts regarding paleontological resources or sites would be less than significant.</p>				
<p><b>8. GREENHOUSE GAS EMISSIONS.</b></p> <p>Would the project:</p>				
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"/>
<p><b>8a. Response:</b> (Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019)</p> <p><b>Less than Significant Impact.</b> As shown in Table 10 of the Air Quality and Greenhouse Gas Analysis (see Attachment 1), construction and operation of the project would result in the annual equivalent emission of 91 metric tons of carbon dioxide equivalent (MT CO<sub>2</sub>E) per year. Project GHG emissions would be less than the applicable SCAQMD screening level of 3,000 MT CO<sub>2</sub>E for commercial uses. As project emissions would be less than the 3,000 MT CO<sub>2</sub>E screening level, GHG emissions impacts would be less than significant.</p>				

<b>ISSUES (AND SUPPORTING FORMATION SOURCES):</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>8b. Response:</b> <i>(Source: Air Quality and Greenhouse Gas Analysis prepared by RECON Environmental on October 17, 2019)</i></p> <p><b>Less than Significant Impact.</b> As discussed in Section 3.2.2, EO S-3-05 established GHG emission reduction targets for the state, and AB 32 launched the California Air Resources Board (CARB) Climate Change Scoping Plan that outlined the reduction measures needed to reach the 2020 target. As discussed above, the project emissions would be below the screening level of 3,000 MT CO<sub>2</sub>E for commercial uses. This threshold is based on the concept of establishing a 90 percent GHG emission capture rate. A 90 percent emission capture rate means that 90 percent of total emissions from all new or modified stationary source projects would be subject to a CEQA analysis, which includes analyzing feasible alternatives and imposing feasible mitigation measures. The market capture rate is based on guidance from the California Air Pollution Control Officers Association (CAPCOA) report CEQA &amp; Climate Change, dated January 2008, which identifies several potential approaches for assessing a project's GHG emissions (see Attachment 1). Following the market capture rate approach, a lead agency defines an acceptable capture rate and identifies the corresponding emissions level. Following rationale presented in the CAPCOA Guidance, the aggregate emissions from all projects with individual annual emissions that are equal to or less than the identified market capture rate would not impede achievement of the state GHG emissions reduction targets codified by AB 32 (2006) and SB 32 (2016), and impacts under CEQA would therefore be less than cumulatively considerable. A 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions.</p> <p>Project GHG emissions would be less than the applicable SCAQMD screening level of 3,000 MT CO<sub>2</sub>E for commercial uses. Further, project emissions would decline beyond the buildout year of the project as a result of continued implementation of federal, state, and local reduction measures such as increased federal and state vehicle efficiency standards, and Riverside Public Utilities' increased renewable sources of energy in accordance with RPS goals. Based on currently available models and regulatory forecasting, project emissions would continue to decline through at least 2050. Given the reasonably anticipated decline in project emissions, once fully constructed and operational, the project is in line with the GHG reductions needed to achieve the 2050 GHG emission reduction targets identified by EO S-3-05.</p>				
<p><b>9. HAZARDS &amp; HAZARDOUS MATERIALS.</b></p> <p>Would the project:</p>				
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"/>
<p><b>9a. Response:</b> <i>(Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR)</i></p> <p><b>Less than Significant Impact.</b> The proposed project does not directly involve the transport, use, or disposal of any hazardous material. Future tenants of the proposed project will not necessarily, but may, engage in the routine transport, use, or disposal of hazardous materials or wastes. If hazardous materials are proposed on-site in the future, they will be subject to state and federal regulation for permitting and inspection by the Hazardous Materials Division of the City Fire Department. The General Plan 2025 Public Safety Element also specifies a number of policies regarding the safe handling, transport and disposal of hazardous materials, with which the project will comply (GP 2025 Policies PS-3.1 through 3.5).</p> <p>Widely used hazardous materials common at any self-storage land use include paints and other solvents, cleaners, automobile fluids, and pesticides. The remnants of these and other products are disposed of as household hazardous waste that includes used motor oil, dead batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport, use of hazardous materials or wastes will be less than significant.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
<b>9b. Response:</b> <i>(Source: Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR)</i> <b>Less than Significant Impact.</b> The project may involve the use of hazardous materials but shall comply with all applicable federal, state, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials. Compliance will be enforced by the on-site manager who will notify all facility users that the storage of hazardous materials is prohibited. In addition, on-site managers will be trained to specifically identify the transfer/unloading of such materials. Compliance with all applicable federal, state and local laws related to the transportation, use and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use and storage to a less than significant impact.				
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"/>
<b>9c. Response:</b> <i>(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code)</i> <b>Less than Significant Impact.</b> No schools are within 0.25 mile of the project site. The nearest school is Riverside Poly High School, located 0.9 mile southeast of the project site. The proposed project involves the expansion of the existing self-storage facility located south of the site by constructing an additional storage area of 13,400 square feet. Hazardous materials and/or waste generated from the proposed development are not expected to occur. Thus, impacts associated with the exposure of schools to hazardous materials caused by this project 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9d. Response:</b> <i>(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)</i> <b>Less than Significant Impact.</b> No hazardous materials sites, compiled pursuant to Government Code Section 65962.5, are depicted on or adjacent to the project location on the EnviroStor (2019) online database. In addition, the Figure PS-5 of the General Plan 2025 does not list any hazardous waste sites on or adjacent to the project site. Hazardous materials are not located on-site and the project will result in a less than significant.				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>9e. Response:</b> <i>(Source: General Plan 2025 Figure PS-6)</i> <b>Less than Significant Impact.</b> Riverside Municipal Airport is located approximately 5.5 miles southwest of the project site and the March Air Reserve Base is located approximately 9.5 miles southeast of the project site. As shown in Figure PS-6 of the General Plan 2025, the project site is not located within an airport safety and compatibility zone. On December 20, 2020, the project was reviewed by the Airport Land Use Commission (ALUC) and determined the project is consistent with the compatibility zone as well as in compliance with the land use standards in the Riverside County Airport Land Use Compatibility Plan (RCALUCP). Because the project has been found to be consistent with the RCALUCP impacts would be less than significant.				



ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>9f. Response:</b> <i>(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials, City of Riverside’s Emergency Operations Plan (EOP), 2002 and Riverside Operational Area – Multi-Jurisdictional Local Hazard Mitigation Plan (LHMP), 2004 Part 1, and OEM’s Strategic Plan)</i></p> <p><b>Less than Significant Impact.</b> The project is within an urbanized area and will be served by the surrounding network of existing, fully improved streets. All streets have been designed to meet the Public Works and Fire Department specifications. As part of the project’s construction, temporary street closures may be necessary and would be implemented in accordance with a typical traffic control plan approved by the City. Any street closing will be of short duration so as not to interfere or impede with any emergency response or evacuation plan. Therefore, impacts would be less than significant.</p>				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>9g. Response:</b> <i>(Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas)</i></p> <p><b>No Impact.</b> The proposed project is located in an urbanized area where no wildlands exist and the property is not located within a Very High Fire Hazard Area or adjacent to wildland areas or a Very High Fire Hazard Area (Figure PS-7 GP 2025 Program FEIR). Therefore, no impact would occur.</p>				
<p><b>10. HYDROLOGY AND WATER QUALITY.</b></p> <p>Would the project:</p>				
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"/>
<p><b>10a. Response:</b> <i>(Source: GP 2025 FPEIR and Preliminary Water Quality Management Plan (WQMP) prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</i></p> <p><b>Less than Significant Impact.</b> The project site is located within the Santa Ana River watershed (General Plan 2025 Figure SO-9 – Watersheds and FPEIR Figure 5.8-1). The project site is currently undeveloped. The Santa Ana Regional Water Quality Control Board (RWQCB) administers the NPDES permit in the region. The City is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce non-point source pollutant loading through the implementation of best management practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and educational programs. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The proposed project would not interfere with the implementation of NPDES water quality regulations and standards.</p> <p>The proposed project will regrade approximately 1.52 gross acres of land and therefore will be subject to NPDES permit requirements during construction activities in addition to standard NPDES operational requirements. The proposed project will require submittal to the local reviewing agency, the Santa Ana RWQCB, a SWPPP that will include BMPs protect water quality during construction activities. BMPs will be required as listed in the California Stormwater Quality Association’s California Storm Water Best Management Practice Handbooks. These measures, which include owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, and trash storage areas, will reduce pollutants in storm water runoff and reduce non-storm water discharges to the City’s storm water drainage through controlling the discharge of pollutants. Operational BMPs will be identified in a Stormwater Runoff Management Plan that will be submitted with grading and construction documents for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations. Given compliance with all applicable local, state, and federal laws regulating surface water quality, the proposed project as designed is anticipated to result in a less than significant impact.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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"/>
<b>10b. Response:</b> <i>(Source: GP 2025 FPEIR and Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</i> <b>Less than Significant Impact.</b> The proposed project is located within the Riverside South Water Supply Basin. The project is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements that will ensure the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there will be less than significant impact to groundwater supplies and recharge either directly, indirectly or cumulatively. Therefore, the proposed project will result in a less than significant impact to groundwater supplies and recharge.				
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 substantial erosion or siltation on-or-off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10i Response:</b> <i>(Source: Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</i> <b>Less than Significant Impact.</b> Drainage patterns would remain similar to existing conditions. No Jurisdictional/City riparian habitat or drainage features are located onsite. Furthermore, the project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a SWPPP for the prevention of runoff during construction. Proposed on-site low impact development principles include the implementation of BMPs including landscaping and an infiltration basin. The project-specific Preliminary WQMP (Attachment 3) identifies proposed drainage management areas and the effectiveness of proposed BMPs.  The design of the proposed project will not substantially alter drainage patterns in the area to the extent that substantial on- or off-site erosion or siltation will occur. Therefore, the project would have a less than significant impact to existing drainage patterns.				
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10ii Response:</b> <i>(Source: Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</i> <b>Less than Significant Impact.</b> As stated in the preliminary WQMP, the proposed development will flow to the southwest corner of the site similar to the existing flow. In addition, the project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a SWPPP for the prevention of runoff during construction. The project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site and would require implementation of a SWPPP. Thus, impacts would be less than significant.				
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"/>
<b>10iii Response:</b> <i>(Source: Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</i> <b>Less than Significant Impact.</b> The proposed development will increase the amount of impervious surface area in the city. This impervious area includes paved parking areas, sidewalks, roadways, and building rooftops; all sources of runoff that may carry pollutants and therefore has the potential to degrade water quality. This development has been required to prepare and implement a WQMP. A preliminary WQMP was prepared for the project on August 2019 by Joseph E. Bonadiman & Associates, Inc.  Preliminary BMPs, in compliance with the preliminary WQMP, have been approved by the Public Works Department. Expected storm water pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific WQMP. Project-related storm water flows will be directed to the proposed				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
infiltration basins and infiltrate into the soil. The proposed water quality function of the basin would reduce the amount of polluted runoff that would be conveyed into the ground water. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff and there would be a less than significant impact.				
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>10iv Response: (Source: Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</b> <b>Less than Significant Impact.</b> As stated in the preliminary WQMP, the proposed development will flow to the southwest corner of the site similar to the existing flow. In addition, the project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a SWPPP for the prevention of runoff during construction. Since the proposed project would not impede or redirect flood flows and would require implementation of a SWPPP, impacts would be less than significant.				
d. In floor 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"/>
<b>10d. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)</b> <b>No Impact.</b> Tsunamis are large waves that occur in coastal areas; therefore, since the city is not located in a coastal area, no impacts due to tsunamis will occur directly, indirectly, or cumulatively. The proposed project site and its surroundings have generally flat topography and are within an urbanized area not within proximity to Lake Mathews, Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain Area or any of the nine arroyos that transverse the City and its sphere of influence. Therefore, no impact potential for seiche or mudflow exists.				
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"/>
<b>10e. Response: (Source: Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</b> <b>Less than Significant Impact.</b> The proposed development will increase the amount of impervious surface area in the city. This impervious area includes paved parking areas, roadways, and building rooftops; all sources of runoff may carry pollutants and therefore has the potential to degrade water quality. As previously stated, this development has been required to prepare and implement a WQMP. Expected storm water pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific WQMP. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff and there will be a less than significant impact.				
<b>11. LAND USE AND PLANNING:</b>				
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>11a. Response: (Source: General Plan 2025 Land Use and Urban Design Element, Preliminary Grading Plan, Google Earth)</b> <b>No Impact.</b> The project will be served by fully improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or an established community. The proposed project will not physically divide an establish community or have a direct impact on an established community development standards. No impacts would occur.				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>11b. Response: (Source: General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Title 19 – Zoning Code)</b> <b>Less than Significant Impact.</b> The project proposes the development of the site as a self-storage facility. The project will comply to the objectives of the General Plan and Land Use Objectives with its reduction in noise, increase in public safety with the securing of the subject site, and provide traffic relief by providing a closer community service to several neighboring residences currently traveling greater distances for their storage needs. The proposed development would also address the				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
General Plan goals of reducing noise, increase in public safety by securing the existing site and alleviating traffic by providing the community with an in-need service thus reducing travel distances of consumers. For these reasons, this project will have less than significant impact on an applicable land use plan, policy, or regulation.				
<b>12. MINERAL RESOURCES.</b> Would the project:				
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"/>
<p><b>12a. Response:</b> <i>(Source: General Plan 2025 FPEIR Figure – 5.10)</i></p> <p><b>No Impact.</b> The proposed project is located in Mineral Resource Zone 4 (MRZ); MRZs as shown in Figure 5.10 of the General Plan 2025 FPEIR. This indicates that the presence or absence of mineral resources under the site are not known. The California Department of Conservation Division of Mines and Geology emphasizes that this does not necessarily mean that the presence of mineral resources at the site is unlikely; rather, just that there is insufficient information available to determine presence or absence.</p> <p>However, mining operations in the City have not been active for decades. According to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred; therefore, the proposed project would not result in any loss of availability of any known or unknown mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and surrounding land uses would preclude mining from occurring. Further, the designated land uses for the project site and for the surrounding area are incompatible for mining operations. Less than significant impact will occur.</p>				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>12b. Response:</b> <i>(Source: General Plan 2025 FPEIR Figure – 5.10)</i></p> <p><b>No Impact.</b> The General Plan 2025 FPEIR determined that there are no specific areas within the city’s Sphere of Influence that have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The project proposes a general plan amendment from Low Density Residential to Commercial. This amendment would not affect the current determination on mineral resources in the General Plan 2025 FPEIR. Therefore, the project will have no impact on locally significant mineral resources.</p>				
<b>13. NOISE.</b> Would the project result in:				
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"/>
<p><b>13a. Response:</b> <i>(Source: Project Specific Noise Analysis prepared by RECON Environmental, Inc. on October 21, 2019)</i></p> <p>A Noise Analysis was prepared for the project by RECON Environmental, Inc. and can be found as Attachment 4.</p> <p><b>Less than Significant Impact</b></p> <p><u>Construction Noise</u></p> <p>Project construction noise would be generated by diesel engine-driven construction equipment used for site preparation and grading, building construction, loading, unloading, and placing materials and paving. The City’s noise ordinance limits construction activities to the hours of 7:00 a.m. to 7:00 p.m. on weekdays, and 8:00 a.m. to 5:00 p.m. on Saturdays. Construction activities would generally occur over the period between 7:00 a.m. and 5:00 p.m. on weekdays. Construction activities would adhere to the requirements of the City’s Municipal Code.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact																																				
<u>Operational Impacts</u>																																								
On-site generated noise levels in the city are regulated by Chapter 7.25 of Title 7 of the City’s Municipal Code. The primary noise sources on-site would be vehicles/moving trucks driving through the project site to access individual storage units, and roll-up doors. Using the on-site noise source parameters discussed in Section 4.2, noise levels were modeled at a series of 10 receivers located at the adjacent residential uses. Modeled noise levels took into account grading and shielding provided by the proposed buildings. Future noise levels are summarized in Table 6.																																								
<table><tr><th colspan="3">Table 6 On-Site Generated Noise Levels</th></tr><tr><th>Receiver</th><th>Noise Limit Daytime/Nighttime [dB(A) L<sub>eq</sub>]</th><th>Noise Level [dB(A) L<sub>eq</sub>]</th></tr><tr><td>1</td><td>55/45</td><td>37</td></tr><tr><td>2</td><td>55/45</td><td>40</td></tr><tr><td>3</td><td>55/45</td><td>44</td></tr><tr><td>4</td><td>55/45</td><td>44</td></tr><tr><td>5</td><td>55/45</td><td>44</td></tr><tr><td>6</td><td>55/45</td><td>38</td></tr><tr><td>7</td><td>55/45</td><td>37</td></tr><tr><td>8</td><td>55/45</td><td>37</td></tr><tr><td>9</td><td>55/45</td><td>37</td></tr><tr><td>10</td><td>55/45</td><td>37</td></tr></table>					Table 6 On-Site Generated Noise Levels			Receiver	Noise Limit Daytime/Nighttime [dB(A) L <sub>eq</sub> ]	Noise Level [dB(A) L <sub>eq</sub> ]	1	55/45	37	2	55/45	40	3	55/45	44	4	55/45	44	5	55/45	44	6	55/45	38	7	55/45	37	8	55/45	37	9	55/45	37	10	55/45	37
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10	55/45	37																																						
As shown in Table 6, noise levels at the nearby residential uses to the east would range from 37 to 44 dB(A) L <sub>eq</sub> , and would not exceed the daytime or nighttime noise limits of 55 and 45 dB(A) L <sub>eq</sub> , respectively. According to the Federal Highway Administration’s (FHWA) Highway Traffic Noise Analysis and Abatement Guidance, with windows in the open position, standard construction provides an exterior to interior noise level reduction of 10 dB. Thus, because exterior noise levels would be less than 45 dB(A) L <sub>eq</sub> , interior noise levels would not exceed the nighttime interior noise level limit of 35 dB(A) L <sub>eq</sub> . It should be noted that this is a worst-case analysis with all roll-up doors being opened and closed and 25 moving trucks accessing the site in the same one-hour period. Actual noise levels due to on-site operations would be less than those shown in Table 6. Therefore, noise impacts due to on-site generated noise would be less than significant.																																								
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>																																				
<b>13b. Response:</b> <i>(Source: Project Specific Noise Analysis prepared by RECON Environmental on October 21, 2019)</i> <b>No Impact.</b> Groundborne vibration generated by construction activities is usually highest during pile-driving, blasting, soil-compacting, jack-hammering, and demolition-related activities. No blasting or demolition activities would occur with the proposed project. However, the project may require pile-driving to provide foundation support.																																								
The City of Riverside has not developed applicable standards for structural damage from vibration. Caltrans has set thresholds for the potential for vibration damage as shown in Table 7.																																								



ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact																													
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None of the structures on or adjacent to the site are designated as City of Riverside Cultural Heritage Landmarks nor are they part of a historic district (Riverside 2018). The off-site residential buildings located east of the project site are not considered historic, fragile or extremely susceptible to vibration damage. Thus, the project would not result in the generation of excessive ground borne vibration or ground borne noise levels. No impacts would occur.																																	
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 checked="" type="checkbox"/>	<input type="checkbox"/>																													
13c. Response: (Source: Project Specific Noise Analysis prepared by RECON Environmental on October 21, 2019) Less than Significant Impact. Riverside Municipal Airport is located approximately 5.5 miles southwest of the project site and the March Air Reserve Base is located approximately 9.5 miles southeast of the project site. As shown in Figure 5.7-2 of the General Plan 2025 Program Final PEIR, the project site is not located within an airport safety and compatibility zone. On December 10, 2020, the project was reviewed by the ALUC and determined that the project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUCP. Because the project has been found to be consistent with the RCALUCP impacts to persons residing or working in the area would be less than significant.																																	
14. POPULATION AND HOUSING.																																	
Would the project:																																	
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 checked="" type="checkbox"/>	<input type="checkbox"/>																													
14a. Response: (Source: General Plan 2025 – Land Use and Urban Design Element) Less than Significant Impact. The project involves the construction of approximately 13,400 square feet of new self-storage facility that may induce population growth through the provision of new employment opportunities within the city. The project proposes a General Plan Amendment from LDR (Low Density Residential) to C (Commercial) and a Zone Change from R-1-7000 (Additional Single-Family Residential Zone) to CR-CS (Commercial Retail – Commercial Storage Overlay Zone). Therefore, the project would reduce land originally designated and zoned for residential use and impacts would be less than significant.																																	

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>14b. Response:</b> (Source: General Plan 2025 – Land Use and Urban Design Element, Google Earth, Project Site Visit) <b>Less than Significant Impact.</b> The project would not displace existing housing or people, necessitating the construction of replacement housing elsewhere because the project site is proposed on vacant land that has no existing housing or residents that would be removed or affected by the proposed project. Thus, direct and indirect impacts related to the displacement of substantial numbers of existing people or housing would be less than significant.				
<b>15. PUBLIC SERVICES.</b>				
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:				
a. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>15a. Response:</b> (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1) <b>Less than Significant Impact.</b> The project is in an urbanized area and consists of the construction and operation of a 14,100-square-foot self-storage facility. Adequate fire facilities and services are provided by Station 3 located at 6395 Riverside Avenue, Riverside, California 92506 to serve this project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, impacts on the demand for additional fire facilities or services would be less than significant.				
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>15b. Response:</b> (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers) <b>Less than Significant Impact.</b> The project is in an urbanized area and consists of the construction and operation of a 14,100-square-foot self-storage facility. The project may require police services during construction and operation of the proposed self-storage. Adequate police facilities and services are provided by Magnolia Neighborhood Policing Center, located at 10540-B Magnolia Avenue, to serve this project.  As with all development within the city, the project applicant shall pay applicable development impact fees to support the provision of police services. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, impacts on the demand for additional police facilities would be less than significant.				
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>15c. Response:</b> (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-3 – AUDS Boundaries) <b>No Impact.</b> The proposed project is within the boundaries of the Riverside Unified School District. Since the project proposes a commercial storage use rather than residential uses, no additional housing will be generated such that the number of school-aged children would increase as a result of the proposed project. Pursuant to Senate Bill 50 and California Government Code, Section 65995, the project applicant shall pay school development impact fees. Through compliance with Senate Bill 50 and California Government Code, Section 65995, no impact to schools would occur.				
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>15d. Response:</b> (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Parks Master Plan 2003, GP 2025 FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative)				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>No Impact.</b> The project proposes a commercial storage use that will not involve the addition of any housing units that would permanently increase the population. The City's adopted standard for developed park acreage of 3 acres per 1,000 residents will not be adversely affected. Therefore, no significant increase in demand on park uses or recreational facilities will occur. In accordance with the City's Parks, Recreation, and Community Services-Park Planning Department, the applicant will make payment of all applicable Park Development Impact Fees (local, aquatic, regional/reserve, and trail fees) for privately developed areas. With the payment of applicable development impact fees, the proposed project will have no impact on the demand for additional park facilities or services.</p>				
<p>e. Other public facilities?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>15e. Response:</b> (Source: General Plan 2025 Figure LU-8 – Community Facilities, FPEIR Figure 5.13-5 - Library Facilities, Figure 5.13-6 - Community Centers, Table 5.3-F – Riverside Community Centers, Table 5.13-H – Riverside Public Library Service Standards)</p>				
<p><b>No Impact.</b> The project would create self-storage facilities within an urbanized area. With implementation of General Plan 2025 policies, compliance with existing codes and standards and through Park and Recreation and Community Services and Library practices, there will be no impact on the demand for additional public facilities or services.</p>				
<p><b>16. RECREATION.</b></p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>16a. Response:</b> (Source: General Plan 2025 Figure PR-1 – Parks, Open Spaces and Trails, Table PR-4 – Park and Recreation Facilities, Figure CCM-6 – Master plan of Trails and Bikeways, Parks Master Plan 2003, FPEIR Table 5.14-A – Park and Recreation Facility Types, and Table 5.14-C – Park and Recreation Facilities Funded in the Riverside Renaissance Initiative, Table 5.14-D – Inventory of Existing Community Centers, Riverside Municipal Code Chapter 16.60 - Local Park Development Fees)</p>				
<p><b>No Impact.</b> The proposed project consists of a commercial storage use that will not involve the addition of any housing units that would permanently increase the population. The City's adopted standard for developed park acreage of 3 acres per 1,000 residents would not be adversely affected. Therefore, no significant increase in demand on park uses or recreational facilities will occur. In accordance with the City's Parks, Recreation, and Community Services-Park Planning Department, the applicant will make payment of all applicable Park Development Impact Fees (local, aquatic, regional/reserve, and trail fees) for privately developed areas. Since the proposed project does not include any uses that would increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facilities would occur or be accelerated, this project will have no impact on existing neighborhood and regional parks.</p>				
<p>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?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>16b. Response:</b> (Source: Riverside Municipal Code Chapter 16.60 - Local Park Development Fees)</p> <p><b>No Impact.</b> The project does not include the construction of residential units that may generate a demand for recreational facilities. Also, the project would not include the provision of recreational facilities on site. The project would pay applicable Park Development Impact Fees to the City, as required under Chapters 16.60, 16.44 and 16.76 of the Riverside Municipal Code, to improve the City's parks and recreational facilities. Thus, no impacts would occur regarding the construction or expansion of recreational facilities.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>17. TRANSPORTATION</b> Would the project result in:				
a. Conflict with the applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>17a. Response: (Source: General Plan 2025 Circulation and Community Mobility Element, Project Plans)</b> <b>Less than Significant Impact.</b> The project was designed to comply with the City requirements relative to access plans and to avoid potential impacts to the adjacent roadway due to the proximity to the rail crossing and the planned Quiet Zone implementation. The project is located west of Union Pacific Railroad Company rail lines and east of SR-91. Access to the project is provided off Central Avenue through the existing self-storage site located south of the project.  The project will not conflict with an applicable plan, ordinance or policy. The 2011 Riverside County Congestion Management Program includes guidelines to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. These guidelines establish a system of state highways and principal arterial roadways designated by the Riverside County Transportation Commission. The adopted minimum level of service (LOS) threshold for congestion management process state highways and principal arterial roadways is LOS E, unless the intersection or segment had a lower LOS (LOS F) in 1991; these facilities are exempt from CMP deficiency plan requirements. With the implementation of the conditions, impacts would be less than significant.				
b. 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 checked="" type="checkbox"/>	<input type="checkbox"/>
<b>17d. Response: (Source: Project Site Plans)</b> <b>Less than Significant Impact.</b> Vehicular access to the project site would be provided via Central Avenue. Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project site area. The proposed project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area. Therefore, the proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts related to hazardous design features would be less than significant.				
c. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>17e. Response: (Source: Project Site Plans)</b> <b>Less than Significant Impact.</b> Direct access for emergency vehicles would be provided from Central Avenue. Access to the project site would remain open during construction, and project site access would be maintained. Therefore, implementation of the proposed project would not result in inadequate emergency access, resulting in a less than significant impact.				
<b>18. TRIBAL CULTURAL RESOURCES.</b> 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:				:
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p><b>18a. Response:</b> <i>(Source: Cultural Resources Survey prepared by RECON Environmental on October 28, 2019, and AB 52 Consultation)</i></p> <p><b>Less than Significant Impact with Mitigation.</b> RECON Environmental, Inc. contacted the Native American Heritage Commission on August 22, 2019, requesting a search of their Sacred Lands File for information on Native American cultural resources in or adjacent to the project APE. A reply was received on September 19, 2019, stating that the search of the Sacred Lands Files was completed with negative results.</p> <p>In accordance with SB 18 and AB 52 requirements, the City contacted Native American tribes who may also have knowledge of cultural resources in the project area. A total of five tribes responded and three tribes requested consultation including the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe. Native American representatives from these tribes have requested implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4 which outline monitoring and treatment protocols in the event that Native American cultural resources are inadvertently discovered during the course of grading for the project. Therefore, implementation of Mitigation Measures CUL-1 through CUL-4 would reduce any potentially significant impacts regarding unknown tribal resources to less than significant.</p>				
<p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>18b. Response:</b> <i>(Source: AB 52 Consultation)</i></p> <p><b>Less than Significant Impact with Mitigation.</b> No Tribal Cultural Resources or known eligible or listed archaeological resources have been identified on the project site. As described in response 4.19(a.i), above, the City held consultation with the Soboba Band of Luiseño Indians, the Rincon Band of Luiseño Indians, and the Agua Caliente Tribe. Native American representatives from these tribes have requested implementation of Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4 which outline monitoring and treatment protocols in the event that Native American cultural resources are inadvertently discovered during the course of grading for the project. Therefore, implementation of Mitigation Measures CUL-1 through CUL-4 would reduce any potentially significant impacts regarding unknown tribal resources to less than significant.</p> <p><u>Mitigation Measures</u></p> <p>CUL-1, CUL-2, CUL-3, and CUL-4 (See Section 6)</p>				
<p><b>19. UTILITIES AND SYSTEM SERVICES.</b></p> <p>Would the project:</p>				
<p>a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p><b>19a. Response:</b> <i>(Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside’s Sewer Service Area, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)</i></p> <p><b>Less than Significant Impact.</b> The proposed project involves the expansion of the existing self-storage facility located south of the site by constructing an additional storage area of 13,400 square feet. The proposed project would result in an increase in impervious surface areas. An increase in impervious area would generate increased storm water flows with potential to affect drainage facilities. However, since the proposed project involves a small self-storage facility, utility systems would not be impacted.</p>				



ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>The project is within the boundaries of the Santa Ana RWQCB and subject to the Riverside County Drainage Area Management Plan. The project would be required to comply with all provisions of the NPDES program and the City's MS4 Permit, as enforced by the RWQCB.</p> <p>In addition, subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction.</p> <p>Due to the project consisting of a small self-storage facility, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities. In addition, project compliance to the above policies and regulations would mitigate any potential impacts regarding the relocation or construction of new facilities. In addition, the General Plan 2025 includes policies and programs that would minimize the environmental effects of the development of facilities. Thus, the project would have a less than significant impact on the relocation or construction of new facilities.</p>				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>19b. Response:</b> (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025)</p> <p><b>No Impact.</b> The project will not exceed expected water supplies. The project is consistent with the General Plan 2025 Typical Growth Scenario where future water supplies were determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I and 5.16-J of the General Plan 2025 Final PEIR). Therefore, the project will have no impact resulting in insufficient water supplies.</p>				
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"/>
<p><b>19c. Response:</b> (Source: General Plan 2025 FPEIR Table 5.16-K)</p> <p><b>Less than Significant Impact.</b> The project will not exceed wastewater treatment requirements of the RWQCB. The project is consistent with the General Plan 2025 Typical Growth Scenario wherein future wastewater generation was determined to be adequate (see Table 5.16-K of the General Plan 2025 Final PEIR). Further, self-storage facilities generate limited wastewater and the current Wastewater Treatment Master Plan anticipates and provides for this type of project. Therefore, no impact related to wastewater treatment.</p>				
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 type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>19d. Response:</b> (Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)</p> <p><b>No Impact.</b> The project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR). Therefore, no impact to landfill capacity would occur.</p>				
e. 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"/>
<p><b>19e. Response:</b> (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)</p> <p><b>No Impact.</b> The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The City is currently achieving a 60 percent diversion rate, well above state requirements. In addition, the California Green Building Code requires all developments to divert 50 percent of non-hazardous construction and demolition debris for all projects and all excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed project must comply with the City's waste disposal requirements as well as the California Green Building Code. For these reasons, the project would not conflict with any federal, state, or local regulations related to solid waste. Therefore, no impact related to solid waste statutes would occur.</p>				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>20. WILDFIRE</b> 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>20a. Response: (Source: California Department of Forestry and Fire (CALFIRE) Prevention – Western Riverside County – Very High Fire Hazard Severity Zones in LRA, Public Works Construction Greenbook)</b> <b>No impact.</b> The proposed project is not within a designated Very High Fire Hazard Severity Zones (VHFHSZ), as defined by CALFIRE Prevention. As stated in Threshold 9f in Section 9, Hazards and Hazardous Materials, emergency evacuation in the city would be conducted under the supervision of the City’s Police Department, Fire Department, and/or the California Office of Emergency Services in accordance with the City’s EOP, LHMP, and Fire Department Strategic Plan, which address the City’s planned responses to emergencies and hazards. During construction, any street closures would be of short duration so as not to interfere or impede with any emergency response or evacuation in the surrounding areas, and at least one lane of travel would be maintained in each direction at all times. Temporary and partial street closures would comply with the Standard Specifications for Public Works Construction (Greenbook) (as amended and adopted by the City), which contains standards for maintenance of access; traffic control; and notification of emergency personnel. Additionally, because Thresholds 20a through 20d apply only to those projects that are “located in or near state responsibility areas or lands classified as very high fire hazard severity zones,” no impact related to wildland fires would occur.				
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"/>
<b>20b. Response: (Source: General Plan 2025 – Figure PS-7, CALFIRE)</b> <b>No impact.</b> As indicated in Threshold 9g in Section 9, Hazards and Hazardous Materials, the project site is located in an urbanized area, and there are no large undeveloped areas and steep slopes on or near the site that may exacerbate the risk of wildfire and thus expose future residents to fire hazards and pollutants from fire. The project site and the surrounding areas are not located in designated Fire Hazard Areas, as shown in Figure PS-7 of the General Plan 2025 or in a VHFHSZ, as identified by CALFIRE. Rather, the site is within a Non-VHFHSZ area. The nearest VHFHSZ is located approximately 3.2 miles east of the site, near Sycamore Canyon Wilderness Park. Since the proposed project would not be exposed to nor would it create wildfire hazards (as consistent with Riverside General Plan Objective PS-6), no impact related to wildland fires would occur.				
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"/>
<b>20c. Response: (Source: CALFIRE)</b> <b>No impact.</b> As previously discussed, the proposed project is not within a designated VHFHSZ, as defined by CALFIRE. As indicated in Section 3.0, Project Description, the site is located in a highly urbanized area that is already served by existing infrastructure such as roads and utilities. Any new utility infrastructure at the site will be constructed in accordance with all applicable regulatory standards and would not exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Additionally, because Thresholds 20a through 20d apply only to those projects that are “located in or near state responsibility areas or lands classified as very high fire hazard severity zones,” no impacts related to these thresholds would occur.				
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"/>
<b>20d. Response: (Source: CALFIRE Prevention, Preliminary WQMP prepared by Joseph E. Bonadiman &amp; Assoc., Inc.)</b> <b>No impact.</b> As previously described, the proposed project is not within a designated VHFHSZ, as defined by CALFIRE. The project is located in a highly urbanized area, and the site topography is generally flat and away from downslope or landslide areas. Proposed drainage changes are described in Section 10, Hydrology and Water Quality. Specifically,				

ISSUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
implementation of the project would not 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 impacts would occur.				
<b>21. MANDATORY FINDINGS OF SIGNIFICANCE.</b>				
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 an endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>21a. Response:</b> <i>(Source: General Plan 2025 – Figure OS-6 –SKR Core Reserve and Other HCP, Figure OS-7 – MSHCP Cores and Linkages, Figure OS-8 – MSHCP Cell Areas, General Plan 2025 FPEIR Figure 5.4-2 – MSHCP Area Plans, Title 20 of the Riverside Municipal Code, and Cultural Resources Survey prepared by RECON Environmental on October 28, 2019)</i></p> <p><b>Less than Significant Impact with Mitigation.</b> As discussed in the Biological Resources section of this initial study, potential impacts related to habitat of fish or wildlife species were all found to be less than significant. The vacant project site is located within an urban built-up area and is generally surrounded by existing development.</p> <p>Additionally, potential impacts to cultural and archaeological resources related to major periods of California and the City of Riverside’s history or prehistory were discussed in the Cultural Resources Section of this Initial Study, and were found to be less than significant with mitigation incorporated.</p>				
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"/>
<p><b>21b. Response:</b> <i>(Source: FPEIR Section 6 – Long-Term Effects/Cumulative Impacts for the General Plan 2025 Program)</i></p> <p><b>Less than Significant Impact.</b> The proposed project has either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues pursuant to CEQA. Due to the limited scope of direct physical impacts to the environment associated with the proposed project, the project’s impacts are primarily project-specific in nature. In addition, since the project is consistent with the General Plan 2025, no new cumulative impacts are anticipated and therefore cumulative impacts of the proposed project beyond those previously considered in the GP 2025 FPEIR are less than significant.</p>				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>21c. Response:</b> <i>(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)</i></p> <p><b>Less than Significant Impact with Mitigation.</b> Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology and water quality, noise, population and housing, public facilities, hazards and hazardous materials, recreation, transportation, and wildfire sections of this initial study. Based on the analysis and conclusions in this initial study, the project, with mitigation, will not cause substantial adverse effects, directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed project are less than significant with mitigation incorporated.</p>				

***Staff Recommended Mitigation Measures***

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<b>Impact Category</b>	<b>Mitigation Measures</b>	<b>Implementation Timing</b>	<b>Responsible Monitoring Party<sup>1</sup></b>	<b>Monitoring/Reporting Method</b>
BIO-1	In the event that vegetation clearing is necessary during the bird nesting season (February 1 – September 15), a qualified biologist shall conduct a preconstruction survey to identify the locations of nests within the areas affected by clearing activities. An exclusionary zone shall be established around any active nest. The dimensions of the zone shall be determined by a qualified biologist and is dependent on the species of bird detected. This zone shall be clearly marked in the field, and construction or clearing shall not be conducted within this zone until the biologist determines the nest is no longer active.	In the event that vegetation clearing is necessary during the bird nesting season (February 1 – September 15)	A qualified biologist	Survey Report
CUL-1	Prior to grading permit issuance, if there are any changes to project site design and/or proposed grades, the Applicant and the City shall contact consulting tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and consulting tribes to discuss any proposed changes and review any new impacts and/or potential avoidance/preservation of the cultural resources on the project site. The City and the developer/applicant shall make all attempts to avoid and/or preserve in place as many cultural and paleontological resources as possible that are located on the project site if the site design and/or proposed grades should be revised. In the event of inadvertent discoveries of archaeological resources, work shall temporarily halt until agreements are executed with consulting tribe, to provide tribal monitoring for ground disturbing activities.	Prior to grading permit issuance and if there are any changes to project site design and/or proposed grades.	The developer/applicant and the City of Riverside	See Mitigation Measure
CUL-2	Archaeological and Paleontological Monitoring: At least 30 days prior to application for a grading permit and before any grading, excavation and/or ground	At least 30 days prior to application for a grading permit and before any grading,	The developer/applicant	See Mitigation Measure

<sup>1</sup> All agencies are City of Riverside Departments/Divisions unless otherwise noted.

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	<p>disturbing activities take place, the developer/applicant shall retain a Secretary of Interior Standards qualified archaeological monitor to monitor all ground-disturbing activities in an effort to identify any unknown archaeological resources.</p> <ol style="list-style-type: none"> <li>1. The project archaeologist, in consultation with consulting tribes, the Developer, and the City, shall develop an Archaeological Monitoring Plan to address the details, timing, and responsibility of all archaeological and cultural activities that will occur on the project site. Details in the plan shall include: <ol style="list-style-type: none"> <li>a. Project grading and development scheduling;</li> <li>b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;</li> <li>c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable paleontological resources that shall be subject to a cultural resources evaluation;</li> </ol> </li> </ol>	excavation and/or ground disturbing activities take place.		



Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	<p>d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and</p> <p>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure.</p>			
<b>CUL-3</b>	<p>Treatment and Disposition of Cultural Resources: In the event that Native American cultural resources are inadvertently discovered during the course of grading for this project, the following procedures will be carried out for treatment and disposition of the discoveries:</p> <ol style="list-style-type: none"> <li>1. Consulting Tribes Notified: within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The developer shall provide the city evidence of notification to consulting tribes. Consulting tribe(s) will be allowed access to the discovery, in order to assist with the significance evaluation.</li> <li>2. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and</li> <li>3. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and non-human remains as part of the required mitigation for impacts to cultural resources. The Applicant shall relinquish the artifacts through one or more of the following methods and provide the City of Riverside Community</li> </ol>	During project grading	The developer/applicant	See Mitigation Measure

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	<p>and Economic Development Department with evidence of same:</p> <ul style="list-style-type: none"> <li>a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</li> <li>b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County, to be accompanied by payment of the fees necessary for permanent curation;</li> <li>c. If more than one Native American tribe or band is involved with the project and cannot come to a consensus as to the disposition of cultural materials, they shall be curated at the Western Science Center or Museum of Riverside by default; and</li> </ul> <p>At the completion of grading, excavation, and ground-disturbing activities on the site, a Phase IV Monitoring Report shall be submitted to the City documenting monitoring activities conducted by the project archaeologist and Native Tribal Monitors within 60 days of completion of grading. This report shall document the</p>			

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party <sup>1</sup>	Monitoring/Reporting Method
	impacts to the known resources on the property; describe how each mitigation measure was fulfilled; document the type of cultural resources recovered and the disposition of such resources; provide evidence of the required cultural sensitivity training for the construction staff held during the required pre-grade meeting; and, in a confidential appendix, include the daily/weekly monitoring notes from the archaeologist. All reports produced will be submitted to the City of Riverside, Eastern Information Center, and consulting tribes.			
<b>CUL-4</b>	Cultural Sensitivity Training: The Secretary of Interior Standards County certified archaeologist and Native American monitors shall attend the pre-grading meeting with the developer/permit holder's contractors to provide Cultural Sensitivity Training for all construction personnel. This shall include the procedures to be followed during ground disturbance in sensitive areas and protocols that apply in the event that unanticipated resources are discovered. Only construction personnel who have received this training can conduct construction and disturbance activities in sensitive areas. A sign-in sheet for attendees of this training shall be included in the Phase IV Monitoring Report.	The pre-grading meeting with the developer/permit holder's contractors	The Secretary of Interior Standards County certified archaeologist and Native American monitors	See Mitigation Measure