CITY OF RIVERSIDE

COMMUNITY & ECONOMIC DEVELOPMENTDEPARTMENT **PLANNING DIVISION**

FINAL MITIGATED NEGATIVE DECLARATION

WARD: 1

1. **Case Number:** PR-2021-000932 (Minor Conditional Use Permit, Design Review, Variance, and Grading Exception)
2. **Project Title:** Marlborough Northgate Light Industrial/Warehouse Buildings
3. **Hearing Date:** TBD
4. **Lead Agency:** City of Riverside
   Community & Economic Development Department
   Planning Division
   3900 Main Street, 3rd Floor
   Riverside, California 92522
5. **Contact Person:** Alyssa Berlino - ABerlino@riversideca.gov
6. **Phone Number:** (951) 826-5628
7. **Project Location:** 900 Marlborough Avenue, Riverside, CA 92507, situated on the southwest corner of Northgate Street and Marlborough Avenue (Figure 1: Project Location).
8. **Project Applicant/Project Sponsor's Name and Address:**
   David Stapley and Deanna Magnon ~~Nicholas Dean Mitchell~~
   Turn 9, LLC ~~The Magnon Companies~~
   1325 Spruce Street, Suite 100
   Riverside, California 92507
9. **General Plan Designation:** B/OP - Business/Office Park
10. **Zoning:** BMP-SP –- Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
11. **Description of Project:**
    The proposed Project involves the development of approximately 99,950 square feet (sf) of two industrial non-refrigerated warehouse buildings (39,000 sf and 60,950 sf) on an approximately 5.63-acre site (Assessor's Parcel Numbers 249-130-023, 249-130-024, and 249-130-026). Building A consists of 38,000 sf of warehouse/industrial area and 1,000 sf of office space, four truck loading docks, a concrete ramp with roll up overhead door, and 42 passenger vehicle parking spaces. Building B consists of 56,950 sf of warehouse area, 3,000 sf of manufacturing area, 1,000 sf of office space and six truck loading docks, a concrete ramp with roll up overhead door, a roll up overhead door (with no ramp) used for similar loading and unloading activities, and 71 passenger vehicle parking spaces. Both concrete ramps at Buildings A and B are standard features common to industrial/warehouses used for ancillary loading points to provide large openings for interior access (e.g. deliveries by forklift, hand dollies, or other non-tractor trailer method; build out of interior racking) and for the ingress and egress of other equipment that is used both inside and outside (e.g. forklifts, dollies, small equipment). All the truck loading dock doors are oriented to the west and away from Marlborough Avenue to the north and the Box Springs Mountain Reserve to the south of the Project site. The loading areas will be

secured with an 8-foot-high concrete screen wall with sliding gate with perforated metal screening, painted to match the building.

Additional site improvements will include paved driveways and walkways, landscaping, and infiltration trenches. Parking, drive aisles, associated hardscape, and sidewalks will cover 71,404 sf, and landscaping will cover 73,789 sf. Mass grading of the 5.63-acre site will include cutting into the hillside in the southern portion of the site and construction of a natural gray split-face concrete masonry unit (CMU) retaining wall ranging from 6 feet to 9 feet 8 inches. The CMU retaining walls highest heights (above 6 feet) are located to the southwest of the site at Building A and range from 6 feet 4 inches to 9 feet 8 inches, and to both the south and southeast portion of the site at Building B range from 6 feet 8 inches to 9 feet 4 inches. The operator is not known at this time however, the Project has been analyzed assuming 24-hour operations.

Construction of the Project is expected to last approximately 14 months and will include site preparation (2 weeks), grading including soil export (4 weeks), building construction (46 weeks), paving (4 weeks), and architectural coating (4 weeks). Equipment used during construction will consist of scrapers, dozers, and trenchers. As described previously, grading of the site will require cutting into the southern hillside and a net export of approximately 54,000 CY of soil. The soil to be exported is anticipated to be delivered to a receptor location within ten miles of the Project site. Construction is expected to be completed by the second quarter of 2023.

The proposed Project uses are consistent with the underlying Business and Manufacturing Park Specific Plan (Hunter Business Park) Overlay Zones, the Industrial Park District land use designation in the Hunter Business Park Specific Plan, and the Business/Office Park (B/OP) General Plan land use designation. For this reason, discretionary review and approval of the Project (Planning Case PR-2021-000932) is limited to approval of a Minor Conditional Use Permit, Design Review, Variance, and Grading Exception.

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

	Existing Use	General Plan Designation	Zoning Designation
Project Site	Undeveloped	B/OP - Business/Office Park	BMP-SP–- Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
North	Industrial	B/OP - Business/Office Park	BMP-SP–- Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
East	Industrial	B/OP - Business/Office Park	BMP-SP –- Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
West	Industrial	B/OP - Business/Office Park	BMP-SP –- Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones
South	Box Springs Mountain Reserve	HR – Hillside Residential	PF-SP – Public Facility and Specific Plan (Hunter Business Park) Overlay Zones

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

None

14. 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.?

Yes, there are a total of 9 tribes the City is required to contact for consultation.

15. Other Environmental Reviews Incorporated by Reference in this Review:

1. General Plan 2025
2. GP 2025 FPEIR
3. Appendix A: Marlborough Northgate Business Center Air Quality Assessment
4. Appendix B: Biological Resource Assessment for the Marlborough-Northgate Project
5. Appendix C: Cultural and Paleontological Resources Assessment, Marlborough Northgate Business Center
6. Appendix D: Geotechnical Engineering Report, Proposed Marlborough Northgate Business Center Project
7. Appendix E: Marlborough Northgate Business Center Greenhouse Gas Assessment
8. Appendix F: Phase I Environmental Site Assessment and Limited Site Investigation, Proposed Marlborough Northgate Business Center Buildings
9. Appendix G: Marlborough Northgate Business Center Fire Protection Plan
10. Appendix H: Project Specific Water Quality Management Plan
11. Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report
12. Appendix J: Marlborough Northgate Business Center Noise Impact Analysis
13. Appendix K: 900 Marlborough Avenue Light Industrial Development - VMT and Pedestrian Crosswalk Analyses

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Figure 1: Project Location

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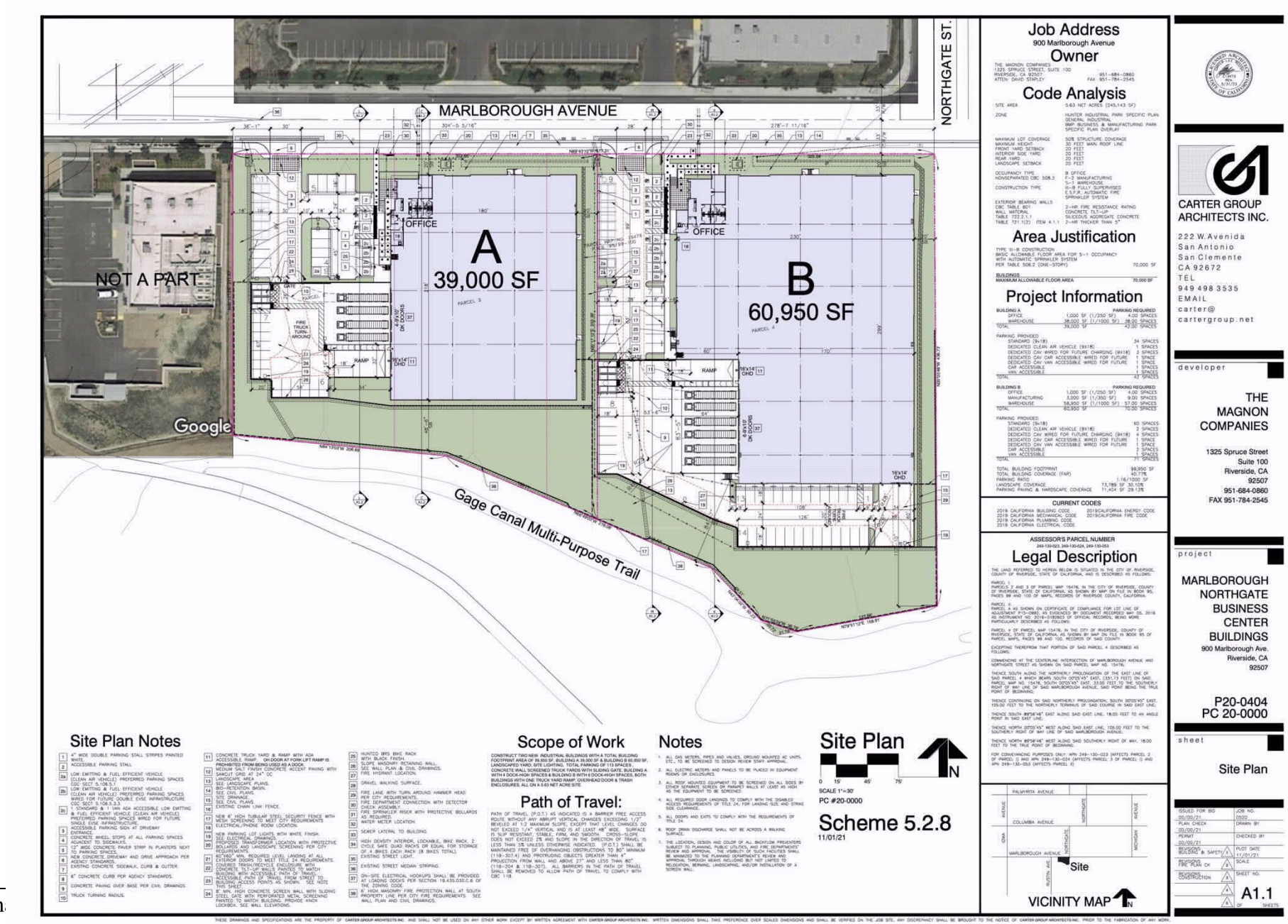
Figure 2: Project Site Plan



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16. List of Tables, Figures and Appendices

17. Acronyms

AICUZ..... Air Installation Compatible Use Zone Study
AQMP ..... Air Quality Management Plan
AUSD ..... Alvord Unified School District
CEQA ..... California Environmental Quality Act
CMP..... Congestion Management Plan
EIR..... Environmental Impact Report
EMWD ..... Eastern Municipal Water District
EOP ..... Emergency Operations Plan
FEMA..... Federal Emergency Management Agency
FPEIR ..... GP 2025 Final Programmatic Environmental Impact Report
GIS..... Geographic Information System
GHG ..... Green House Gas
GP 2025..... General Plan 2025
IS ..... Initial Study
LHMP..... Local Hazard Mitigation Plan
MARB/MIP ..... March Air Reserve Base/March Inland Port
MJPA-JLUS ..... March Joint Powers Authority Joint Land Use Study
MSHCP ..... Multiple-Species Habitat Conservation Plan
MVUSD..... Moreno Valley Unified School District
NCCP..... Natural Communities Conservation Plan
OEM ..... Office of Emergency Services

OPR ..... Office of Planning & Research, State
PEIR ..... Program Environmental Impact Report
PW ..... Public Works, Riverside
RCA ..... Western Riverside County Regional Conservation Authority
RCALUC ..... Riverside County Airport Land Use Commission
RCALUCP ..... Riverside County Airport Land Use Compatibility Plan
RCP ..... Regional Comprehensive Plan
RCTC ..... Riverside County Transportation Commission
RMC ..... Riverside Municipal Code
RPD ..... Riverside Police Department
RPU ..... Riverside Public Utilities
RTIP ..... Regional Transportation Improvement Plan
RTP ..... Regional Transportation Plan
RUSD ..... Riverside Unified School District
SCAG ..... Southern California Association of Governments
SCAQMD ..... South Coast Air Quality Management District
SCH ..... State Clearinghouse
SKR-HCP ..... Stephens' Kangaroo Rat Habitat Conservation Plan
SWPPP ..... Storm Water Pollution Prevention Plan
USGS ..... United States Geologic Survey
WMWD ..... Western Municipal Water District
WQMP ..... Water Quality Management Plan

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.

☒ Aesthetics	☐ Agriculture & Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology and Soils	☐ Greenhouse Gas Emissions	☒ Hazards and Hazardous Materials
☐ Hydrology and Water Quality	☐ Land Use and Planning	☐ Mineral Resources
☐ Noise	☐ Population and Housing	☐ Public Service
☐ Recreation	☒ Transportation and Traffic	☐ Tribal Cultural Resources
☐ Utility Systems	☒ Wildfire	☒ 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 DEC*LARATION 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 Alyssa Berlino, Associate Planner For City of Riverside

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 measures that 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.
9) Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(c) contains provisions specific to confidentiality.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

1a. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 EIR 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)***

Less Than Significant Impact. The Project consists of the construction of two warehouse buildings within a BMP-SP Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones on the toe of a hillside associated with the Box Springs Mountains including Sugarloaf Mountain to the east/southeast, the most prominent peak that can be seen from the site. A City water storage tank is located on the hillside to the south with a minor peak further south, with access to the water tank provided by a paved utility road running up the hillside. The Project site is bordered by existing industrial development to the east, west, and north across Marlborough Avenue. The Project site is one of the last undeveloped parcels along Marlborough Avenue.

Development projects can impact scenic vistas directly by diminishing the scenic quality of the vista or indirectly by blocking the view corridors offering views of scenic resources. In the project vicinity, the peaks and valleys associated with the Box Springs Mountains to the south and east of the site offer the nearest scenic vistas. The City's General Plan states these and other hillsides and ridgelines above Riverside provide scenic benefits to the community.

The proposed Project is located on the toe of a hillside. Due to an approximate 35 to 40-foot grade difference from south to north, a 6-foot to 9-foot, 8-inch-high retaining wall at the base of the cut hillside and a six-foot high masonry fire protection wall further upslope will be constructed in the southern portion of the site to enable development of the proposed warehouse buildings, ancillary parking spaces, driveways, and landscaped areas. With the south portion of the site effectively lowered to the height of the north portion along Marlborough Avenue, the proposed building floor elevations would appear to be at street level, and therefore the buildings would not directly affect the adjacent and nearby Box Springs Mountain hillside resources. The proposed warehouse buildings, at its highest view point would be from the west of Building A at 44 feet and 6 inches in height and would block vistas of the adjacent hillsides as viewed from Marlborough Avenue. The City's General Plan designates scenic and special boulevards within the City that meet local criteria for designation as scenic routes. As shown in the General Plan Draft EIR Figure 5.1-1: Scenic and Special Boulevards and Parkways and in General Plan Draft EIR Table 5.1-A: Scenic and Special Boulevards, Marlborough Avenue is designated as a 66-foot collector along the Project frontage. The General Plan contains various policies focusing on reliance on existing zoning standards and special development standards to control development of hillsides. To limit impacts to hillsides from non-residential development, the hillside development provisions contained in the City's Grading Code (Title 17) are the primary mechanism used to ensure development on hillsides minimize ground disturbances and maintain existing land contours to the maximum extent feasible. The Project includes a grading exception to allow construction of the up to 9 foot, 8 inch high retaining wall, where the Grading Code allows a maximum 6 foot high retaining wall, proposed along the south perimeter of the site and a variance request to reduce the front yard setback along Marlborough Avenue from 50 feet (on average) to 40 feet (on average) necessary to reduce the extensive earthwork required to level the site. The proposed Project will comply with all other applicable zoning standards for the BMP-SP Zone and comply with the City's hillside development standards enforced through the Grading Code. In addition, views of the hillsides from Marlborough Avenue would remain from west of Building A, between Buildings A and B, east of Building B, and the height of the proposed warehouse buildings would not obstruct vistas of the adjacent Box Springs Mountain hillside resources as viewed from locations further away from Marlborough Avenue. In addition, the City has planned for industrial oriented development all along Marlborough Avenue as evidenced by the BMP-SP and Industrial zoning designations between Chicago Avenue and the roadway's east terminus of Northgate Street. Therefore, the Project will result in a **less than significant impact** directly, indirectly or cumulatively to scenic vistas. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

1b. Response: ***(Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 EIR 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, and Title 20 – Cultural Resources)***

Less Than Significant Impact. There are no officially designated State scenic highways or any eligible State scenic highways in the City. As noted in response 1a above, Marlborough Avenue is designated as a 66-foot collector. Also noted in response 1a above, the Project includes a grading exception to allow construction of the up to 9 foot, 8 inch high retaining wall, where the Grading Code allows a maximum 6 foot high retaining wall, proposed along the south perimeter of the site and a variance request to reduce the front yard setback along Marlborough Avenue from 50 feet (on average) to 40 feet (on average) necessary to reduce the extensive earthwork required to level the site. The proposed Project will comply with all other applicable zoning standards for the BMP-SP zone and comply with the City's hillside development standards enforced through the Grading Code to minimize impacts from development of the hillside site. There are no trees, rock outcroppings, or historic buildings located within the Marlborough Avenue right-of-way. The proposed Project will result in a **less than significant impact** directly, indirectly, or cumulatively to scenic resources and no mitigation is required.

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?	☐	☐	☒	☐

1c. Response: ***(Source: General Plan 2025, and General Plan 2025 EIR)***

Less Than Significant Impact. The Project site is currently vacant and on the toe of a hillside, adjacent to developed land to the north, east and west. As discussed in response 1a above, the Project will not significantly alter views of the surrounding Box Springs Mountain hillside resources to the south and east of the site. The proposed Project consists of construction and operation of two warehouses, consistent with the underlying B/OP General Plan land use designation for the site. The Project includes a grading exception to allow construction of the up to 9 foot, 8 inch high retaining wall, where the Grading Code allows a maximum 6 foot high retaining wall, proposed along the south perimeter of the site and a variance request to reduce the front yard setback along Marlborough Avenue from 50 feet (on average) to 40 feet (on average) necessary to reduce the extensive earthwork required to level the site. With the granting of the Grading Exception and Variance, the Project will comply with all the applicable design standards for BMP-SP zoned properties and hillside development standards contained in the Grading Code. Therefore, the Project will not introduce a new use to the vicinity or conflict with existing zoning, will not violate any regulations governing scenic quality, and will not substantially degrade public views, the quality of the site and its surroundings. Therefore, the Project would result in a **less than significant impact** directly, indirectly, or cumulatively to public views and scenic quality of the site and surroundings. No mitigation is required.

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

1d. Response: ***((Source: General Plan 2025, General Plan 2025 EIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, and Citywide Design and Sign Guidelines)***

Less Than Significant. Development of the proposed Project will result in the introduction of outdoor lighting on the site. All lighting will comply with the development standards contained in the City's Zoning Code (Title 19). Chapter 19.590 (Performance Standards) requires that on-site lighting be arranged as to reflect away from adjoining property or any public streets. Light shall not be directed skyward or in a manner that interferes with aircraft operation. As shown in the City's General Plan EIR Figure 5.1-2, Mt. Palomar Nighttime Lighting Policy Area, the site is not within the Mount Palomar Lighting Area.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The areas surrounding the Project site to the north, east and west are developed with industrial uses. Compliance with Zoning Code and California Building and Green Code standards will reduce potential impacts to the built environment from new sources of substantial light or glare on day or nighttime views in the area to a **less than significant impact** directly, indirectly, or cumulatively. No mitigation is required.

The Box Springs Mountain Reserve (Reserve) is located to the southeast of the Project site. The Reserve is part of the MSHCP Conservation Area, and edge effects from lighting associated with nighttime activities on the Project site could create an impact to habitat and species occupying the habitat. This is an impact requiring mitigation. With implementation of **MM AES-1** requiring submittal and approval of a photometric study consistent with the City's Zoning Code Chapter 19.590, impacts from spillover light into the nearby Conservation Area are considered to be **less than significant with mitigation incorporated** directly, indirectly, or cumulatively.

MM AES-1: Prior to the issuance of building permits, a photometric (lighting) plan shall be approved by the Community & Economic Development Department, Planning Division, to prevent light spillage from the parking areas in the south portion of the site onto the adjacent Box Springs Mountain Reserve Park. The approved light design requirements shall be included on the final building plan sheets. The lighting plan shall incorporate the following requirements:

- The project shall be designed in such a manner as to prevent light spillage from the project to the adjacent and nearby open space areas.
- Project lighting shall not exceed an intensity of one foot-candle.
- Shielding shall be employed, where feasible.
- Any night lighting shall be directed away from natural open space areas and directed downward and towards the center of the development.
- No project lights shall blink, flash, oscillate, or be of unusually high intensity or brightness.
- Energy-efficient LPS or HPS lamps shall be used exclusively throughout the project site to dampen glare.
- Exterior lights shall be only "warm" LED lights (<3000K color temperature).

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FOREST RESOURCES				

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information complied 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:

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?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
2a. Response: ***(Source: General Plan 2025 – Figure OS-2)***				
Less Than Significant Impact. The Project is located within an urbanized area including nearby hillsides associated with the Box Springs Mountain and Box Springs Mountain Reserve. As shown on Figure OS-2: Agricultural Suitability in the General Plan, the Project site is not designated as and not near any land classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, the Project will not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact would occur directly, indirectly or cumulatively to Prime, Unique, or Importance Farmland. No mitigation is required. The Project site is designated as Farmland of Local Importance as shown in General Plan Figure OS-2. However, because the site is located on the toe of a hillside, is surrounded by developed properties and an unpaved road, has not been used for agricultural purposes since 1975, and has been planned by the City for industrial oriented development, its value as an agriculturally important land is marginal. Consequently, a **less than significant impact** would occur directly, indirectly or cumulatively to Farmland of Local Importance. No mitigation is required.				
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
2b. Response: ***(Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 EIR – Figure 5.2-2 – Williamson Act Preserves, General Plan 2025 EIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)***				
No Impact. The Project site is located in a BMP-SP Zone where agricultural uses are not allowed. General Plan EIR Figure 5.2-2: Williamson Act Preserves shows the Project site is not located within a Williamson Act Preserve or under a Williamson Act Contract. Property to the southeast of the Project site is located in unincorporated Riverside County and is zoned R-1, which allows agricultural uses. However, this area is designated Agricultural Preserve (OS-C) in the County's General Plan, is associated with the Box Springs Mountain Reserve and is part of the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP) Conservation Area, therefore, it will remain an open space reserve in perpetuity. Property to the south of the Project site is zoned Public Facility (PF), is minimally developed with a dirt utility road, water tank, and paved utility road to the water tank. It is reasonable to conclude this area will not be developed with a more intense land use. Property further south of the Project site on the opposite side of the mountain is zoned RC – Residential Conservation and R-1-7000 - Single Family Residential. Although these zones allow agricultural uses, R-1 Zoned properties are already developed with residential uses and likely will never be used for agricultural purposes. Therefore, the Project will have **no impact** directly, indirectly or cumulatively on Williamson Act Preserves, Contracts, or agricultural zoning. No mitigation is required.				
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))?	☐	☐	☐	☒
2c. Response: ***(Source: GIS Map – Forest Data)***				
No Impact. The City has no forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project will have **no impact** directly, indirectly or cumulatively from conflicts with forestland, timberland, or land zoned timberland production. No mitigation is required.				
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
2d. Response: ***(Source: GIS Map – Forest Data)***				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. As described in response 2c above, the City has no forest land, timberland, or timberland zoned Timberland Production. Therefore, the Project will have **no impact** directly, indirectly or cumulatively from the loss of forest land or conversion of forest land to non-forest use and no mitigation is required.				
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?	☐	☐	☒	☐

2e. Response: (*Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025 EIR, GIS Map – Forest Data)*

Less Than Significant Impact. The Project site is designated as Farmland of Local Importance as shown in General Plan Figure OS-2. However, because the site is located on the toe of a hillside, is surrounded by developed properties and an unpaved road, has not been used for agricultural purposes since 1975, and has been planned by the City for industrial oriented development, its value as an agriculturally important land is marginal. Consequently, a **less than significant impact** would occur directly, indirectly or cumulatively to Farmland of Local Importance. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY				
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

3a. Response: *(Source: South Coast Air Quality Management District, Final 2016 Air Quality Plan (AQMP). Adopted March 2017 and SCAG's Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS))*

Less Than Significant Impact. The Project site is located in the South Coast Air Basin (Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). Measures to improve regional air quality, meet federal and State ambient air quality standards, and reduce greenhouse gas emissions are outlined in the SCAQMD's Air Quality Management Plan (AQMP). Vehicle miles reduction strategies are outlined in the Southern California Association of Government's (SCAG's) 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).

One purpose of the AQMP is to reduce air quality impacts from major projects associated with goods movement, land use, energy efficiency, and other key areas of growth. Specific criteria for determining a project's conformity with the AQMP is defined in Section 12.3 of the SCAQMD's *CEQA Air Quality Handbook*. The *Air Quality Handbook* refers to two consistency criteria as a means to determine a project's conformity with the AQMP. Consistency Criteria 1 refers to a proposed Project's potential for resulting in an increase in the frequency or severity of an existing air quality violation or its potential for contributing to the continuation of an existing air quality violation. Consistency Criteria 2 refers to a proposed Project's potential for exceeding the air pollution emissions assumptions for a project site as contained in the AQMP or other regional growth projections relevant to the AQMP's implementation and attainment of the plan's expressed objectives.

In terms of Criteria 1, the Project's regional and localized construction and operational-source emissions would not exceed applicable regional significance thresholds and therefore the Project conforms to Criteria 1. As a result, a less than significant impact is expected. As discussed in section 3b and shown in Tables 3.b-1 and 3.b-2, estimated Project construction emissions are below the SCAQMD significance maximum daily thresholds for regional and localized emissions. As shown in Tables

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.b-3 and 3.b-4, estimated Project operational emissions are below the SCAQMD significance maximum daily thresholds for regional and localized emissions. Regarding Criteria 2, the proposed Project is consistent with the underlying General Plan land use designation (B/OP) and zoning (BMP-SP) for the site. Projects that are consistent with a local general plan and therefore also consistent with the employment and population forecasts identified in the RTP/SCS are considered consistent with the AQMP growth projections, since the RTP/SCS forms the basis of the land use and transportation control portions of the AQMP. For this reason, projected operational air pollution emissions will be within the emissions projections estimated in the AQMP for the Project site and the Project conforms to Criteria 2. Since the proposed Project will not be in violation of either Consistency Criteria, the Project's potential impacts are considered to be **less than significant impact** directly, indirectly, or cumulatively to the implementation of the AQMP and no mitigation is required.				
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?	☐	☐	☒	☐

3b. Response: ***(Source: South Coast Air Quality Management District, Final 2016 Air Quality Plan (AQMP). Adopted March 2017; Appendix A – Marlborough Northgate Business Center Air Quality Assessment, Urban Crossroads, April 2022; Appendix K – 900 Marlborough Avenue Light Industrial Development - VMT and Pedestrian Crosswalk Analyses)***

Less Than Significant Impact. The Basin is in nonattainment status for the federal and state standards for ozone (O_3) and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), and in nonattainment status for the state standards for particulate matter less than 10 microns in diameter (PM_{10}) and nitrogen dioxide (NO_x). For all other federal and state criteria pollutant standards, the Basin is in attainment/maintenance/unclassified status. Additionally, the SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same; therefore, projects that exceed project-specific significance thresholds are considered by SCAQMD to be cumulatively considerable. The proposed Project will result in the creation of short-term construction and long-term operational (vehicle trip generation, energy consumption, and stationary activities) air pollution emissions. The SCAQMD has significance thresholds for short-term construction and long-term operational regional air pollution emissions, and significance thresholds for short-term construction and long-term operational and localized air pollution emissions. These thresholds are presented in Tables 3.b-1 (regional construction) and 3.b-3 (regional operational).

Localized significance thresholds (LSTs) were developed by SCAQMD's screening look-up tables and are utilized in determining localized impacts. The look-up tables identify thresholds at 1 acre, 2 acres, and 5 acres, and linear regression was utilized to determine localized significance thresholds. Consistent with SCAQMD guidance, the thresholds presented in Tables 3.b-2 (localized construction) and 3.b-4 (localized operational) were calculated by interpolating the threshold values for the Project's disturbed acreage.

Short-Term (Construction) Emissions. Air quality impacts could occur during construction of the proposed Project from soil disturbance and equipment exhaust. After completion of the site preparation/export phase, construction of the Project is anticipated to include grading, building construction, paving and architectural coating phases. Major sources of emissions during grading and site preparation include: (1) soil disturbances from soil export, rough grading, over-excavation, backfilling, final grading; (2) equipment and fugitive dust generated by construction vehicles and equipment traveling over exposed surfaces; and (3) exhaust emissions from construction vehicles. Due to existing topography on the Project site, approximately 55,000 CY of soil will be over-excavated and approximately 800 CY will be recompacted as fill material on-site. The remaining 54,000 CY will be exported to an off-site location. Export haul-truck capacity is assumed to be 14 cubic yards, resulting in approximately 3,858 truckloads of soil export. Export of 80 truck loads are anticipated each day, resulting in a 50-day export period. However, the grading plus soil export schedule assumed in generating Project air pollution emissions was 20-work days based on the estimate calculated by the California Emissions Estimator Model (CalEEMod Version 2020.4.0). Use of this aggressive grading/export schedule results in a conservative analysis, because more truck loads would occur per work day under the compressed schedule resulting in an overstatement of Project air pollution emissions. The export site is currently unknown, however a hauling trip length of 10 miles per trip was assumed.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

To evaluate Project compliance with SCAQMD existing Rule 403 for fugitive dust control, the Project utilized the mitigation option of watering the Project site two times daily which achieves a control efficiency of 50 percent for PM_{10} and $PM_{2.5}$ emissions. Two (2) one-way vendor trips per day were added to the export, grading and paving activities to account for water truck trips. The two warehouse buildings will employ conventional concrete tilt-up building construction and therefore architectural coating (painting) is required.

Construction emissions were calculated using CalEEMod. The daily mitigated construction emissions are summarized in Tables 3.b-1 for the regional maximum daily emissions and 3.b-2 for the peak localized maximum emissions. The proposed Project is required to comply with standard control measures to control construction emissions. These include Rule 401 that addresses visible emissions, Rule 402 that addresses nuisance caused by emissions, and Rule 403 that reduces fugitive dust emissions. The proposed Project is also required to comply with existing rules contained in the California Code of Regulations that establish building energy standards and waste reuse/recycling standards during demolition. The Project emissions estimates contained in Tables 3.b-1 and 3.b-2 are based on compliance with SCAQMD's existing and required standard control measures shown as Standard Conditions AQ-1 and AQ-2 at the end of this subsection (3b). As shown in the table, estimated Project construction emissions are below the SCAQMD significance maximum daily thresholds.

Table 3.b-1: Overall Regional Construction Emissions Summary

Year	Emissions (lbs/day)*					
	VOC	NOx	CO	SOx	PM10	PM2.5
Summer						
2022	3.24	64.00	25.46	0.23	11.03	5.57
2023	41.80	15.92	20.56	0.04	2.21	1.05
Winter						
2022	3.24	66.36	25.61	0.23	11.03	5.57
2023	41.79	16.01	19.87	0.04	2.12	1.05
Maximum Daily Emissions	**41.80**	**66.36**	**25.61**	**0.23**	**11.03**	**5.57**
SCAQMD Regional Threshold	75	100	550	150	150	55
Threshold Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Appendix A - Marlborough Northgate Business Center Air Quality Assessment*, Urban Crossroads, 2022
* With Construction Mitigation Per CalEEMod Emissions Model Outputs

Table 3.b-2: Project Localized Significance Summary of Construction

On-Site Emissions	Emissions (lbs/day)*			
	NOx	CO	PM10	PM2.5
Site Preparation				
Maximum Daily Emissions	**33.08**	**19.70**	**10.11**	**5.51**
SCAQMD Localized Threshold	220	1,230	50	14
Threshold Exceedance?	**No**	**No**	**No**	**No**
Grading				
Maximum Daily Emissions	**20.86**	**15.27**	**4.46**	**2.29**
SCAQMD Localized Threshold	220	1,230	50	12
Threshold Exceedance?	**No**	**No**	**No**	**No**

Source: *Appendix A - Marlborough Northgate Business Center Air Quality Assessment*, Urban Crossroads, 2022
* With Construction Mitigation Per CalEEMod Emissions Model Outputs

Long-Term (Operational) Emissions. Project operations could create long-term emissions from areawide (i.e., stationary), energy, and mobile (i.e., vehicular) sources. Area source emissions include the use of consumer products, yard and landscape maintenance, and an average building square footage to be repainted each year. Energy source emissions are associated with building electricity and natural gas usage. CalEEMod computes area and energy source emissions based on default factors for the Project land use. Mobile source emissions are based on the Project trip generation estimates contained in Appendix K *900 Marlborough Avenue Light Industrial Development - VMT and Pedestrian Crosswalk Analyses*. The maximum daily emissions

and localized emissions from Project operations are summarized in Tables 3.b-3 and 3.b-4, respectively. As shown in the tables, estimated maximum daily operational emissions are below the SCAQMD significance thresholds.

Table 3.b-3: Proposed Project Operational Emissions

Source	Emissions (lbs/day)					
	VOC	NOx	CO	SOx	PM10	PM2.5
Summer						
Area Source	2.27	0.00	0.04	0.00	0.00	0.00
Energy Source	0.10	0.87	0.73	0.00	0.07	0.07
Mobile Source	1.86	4.88	20.62	0.06	5.34	1.47
On-Site Equipment Source	0.11	1.04	0.75	0.00	0.04	0.03
Total Maximum Daily Emissions	**4.33**	**6.79**	**22.13**	**0.07**	**5.44**	**1.57**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**
Winter						
Area Source	2.27	0.00	0.04	0.00	0.00	0.00
Energy Source	0.10	0.87	0.73	0.00	0.07	0.07
Mobile Source	1.62	5.17	18.01	0.06	5.34	1.47
On-Site Equipment Source	0.11	1.04	0.75	0.00	0.04	0.03
Maximum Daily Emissions	**4.09**	**7.07**	**19.52**	**0.07**	**5.44**	**1.57**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceedance?	**No**	**No**	**No**	**No**	**No**	**No**

Source: *Appendix A - Marlborough Northgate Business Center Air Quality Assessment*, Urban Crossroads, 2022

Table 3.b-4: Localized Significance Summary of Operations

On-Site Emissions	Emissions (lbs/day)			
	NOx	CO	PM10	PM2.5
Maximum Daily Emissions	**2.16**	**2.55**	**0.37**	**0.17**
SCAQMD Localized Threshold	220	1,230	12	4
Threshold Exceedance?	**No**	**No**	**No**	**No**

Source: *Appendix A - Marlborough Northgate Business Center Air Quality Assessment*, Urban Crossroads, 2022

Standard Condition AQ-1: Compliance with SCAQMD Rules 401, 402 and 403. During construction, the construction contractor shall comply with the South Coast Air Quality Management District (SCAQMD) Rules 402 and 403 for controlling fugitive dust emissions and construction equipment emissions. In compliance with Rule 403, fugitive dust shall be controlled with best-available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. In addition, dust suppression techniques shall be implemented to prevent fugitive dust from creating a nuisance off site. The following applicable dust suppression techniques from Rule 403 shall be implemented during project construction:

- Nontoxic chemical soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Active sites shall be watered at least twice daily. (Locations where grading is to occur shall be thoroughly watered prior to earthmoving.)
- All trucks hauling dirt, sand, soil, or other loose materials shall be covered, or at least 2 feet (0.6 meter) of freeboard (vertical space between the top of the load and the top of the trailer) shall be maintained in accordance with the requirements of California Vehicle Code (CVC) Section 23114.
- Construction access roads shall be paved at least 100 feet (30 meters) onto the site from the main road.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

- Traffic speeds on all unpaved roads shall be reduced to 15 mph or less.

Additionally, the following construction emissions control measures from the SCAQMD CEQA Handbook are required to further minimize fugitive dust emissions:

- Disturbed areas shall be revegetated as quickly as possible.
- All excavating and grading operations shall be suspended when wind speeds (as instantaneous gusts) exceed 25 mph.
- All streets shall be swept once per day if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).
- Wheel washer devices shall be installed at locations where vehicles enter and exit unpaved roads onto paved roads, or vehicles and any equipment leaving the site shall be washed each trip.
- All on-site roads shall be paved as soon as feasible, watered periodically, or chemically stabilized.
- The area disturbed by clearing, grading, earthmoving, or excavation operations shall be minimized at all times.
- The construction contractor shall select the construction equipment used on site based on low- emission factors and high-energy efficiency. The construction contractor shall ensure that construction-grading plans include a statement that all construction equipment will be tuned and maintained in accordance with the manufacturers' specifications.
- The construction contractor shall utilize electric or diesel-powered equipment in lieu of gasoline-powered engines where feasible.
- The construction contractor shall ensure that construction-grading plans include a statement that work crews will shut off equipment when not in use. During smog season (May through October), the overall length of the construction period will be extended, thereby decreasing the size of the area prepared each day, to minimize vehicles and equipment operating at the same time.
- The construction contractor shall time the construction activities so as to not interfere with peak-hour traffic and minimize obstruction of through traffic lanes adjacent to the site; if necessary, a flagperson shall be retained to maintain safety adjacent to existing roadways.
- The construction contractor shall support and encourage ridesharing and transit incentives for the construction crew.

Standard Condition AQ-2: Compliance with Title 13, California Code of Regulations, Section 2449(d)(d). Operators of applicable off-road vehicles (self-propelled diesel-fueled vehicles 25 horsepower and up that were not designed to be driven on-road) must limit idling to no more than five (5) minutes, both on and off site.

Based on the analysis presented above, the short-term construction and long-term operation of the Project will not exceed applicable regional or localized thresholds established by SCAQMD. Therefore, the proposed Project will not cause a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

3c. Response: ***(Source: SCAQMD's 2016 Air Quality Management Plan, SCAQMD's CEQA Air Quality Handbook Appendix 9 as amended 2017, and SCAQMD's Historical Air Quality Data by Year http://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year)***

Less Than Significant Impact. As detailed previously in response 3b, short-term construction and long-term operational emissions have been found to be below the applicable localized significance thresholds established by SCAQMD. Thus, the proposed Project will not expose sensitive receptors to substantial pollutant concentrations resulting in a **less than significant** directly, indirectly, and cumulatively. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3d. Response: ***(Source: SCAQMD's CEQA Air Quality Handbook)***

Less Than Significant Impact. While exact quantification of objectionable odors cannot be determined due to the subjective nature of what is considered "objectionable," objectionable odors may be emitted during the operation of diesel-fueled equipment during construction of the Project. However, these odors would occur only during daylight hours, be short-term in duration, and would be isolated to the immediate vicinity of the construction site. Therefore, they would not expose a substantial number of people to objectionable odors. Projects typically associated with odor complaints include agricultural, wastewater treatment plants, food processing plants, chemical plants, composting operations, refineries, landfills, dairies, and fiberglass molding facilities. Operations associated with the Project would consist of conventional warehousing activities that do not produce objectionable odors. Therefore, the Project will not cause objectionable odors affecting a substantial number of people per SCAQMD Rule 402, resulting in **less than significant impact** directly, indirectly and cumulatively. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES				
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?	☐	☒	☐	☐

4a. Response: ***(Source: Appendix B - Biological Resource Assessment for the Marlborough-Northgate Project, Carlson Strategic Land Solutions, April 2022)***

Less Than Significant Impact with Mitigation Incorporated. The proposed Project site is approximately 6 acres of vacant property and consists of primarily disturbed habitat. Immediate surrounding land uses include an industrial business park and warehouse to the north, east, and west. Directly to the south is an access road separating the Project site from undeveloped hillside property that contains a City water storage tank at the top of the hill. Southeast of the Project site is the Box Springs Mountain Reserve (Reserve), which is part of the Conservation Area associated with the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP).

According to the *Biological Resource Assessment for the Marlborough-Northgate Project, Carlson Strategic Land Solutions, April 2022*, field surveys were conducted on the Project site and surrounding 500-foot buffer. No special status species or sensitive plant species were identified to occur onsite, nor were they observed onsite. Development of the Project site would result in the direct removal of non-native and ruderal plant species. Therefore, the Project would not adversely affect special status plant species or sensitive plant species, resulting in a **less than significant impact** directly, indirectly and cumulatively. No mitigation is required.

Development of the Project would result in the disruption and removal of potential habitat for wildlife. No special status species or sensitive plant species were identified to occur onsite, nor were they observed onsite. However, implementation of the Project would include the removal of habitat of non-sensitive common wildlife species. Due to the level of disturbance from human activity onsite and within the vicinity, the Project impacts would not be expected to reduce the general wildlife population below self-sustaining levels. Therefore, the Project would not adversely affect special status wildlife species or

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

sensitive wildlife species, resulting in a **less than significant impact** directly, indirectly and cumulatively. No mitigation is required.

The surrounding 500-foot buffer area consists of ruderal, grasslands, scattered coastal sage scrub, and disturbed vegetation communities of which has the potential to support sensitive wildlife foraging and nesting habitat. Potential adverse indirect impacts to common wildlife, specifically to the southeast of the Project within the Reserve property include an increase in construction related noise, litter, pollutants, dust, oil, and other human debris. Also, there would be an increase in noise and nighttime lighting during long-term operations. While no sensitive species were observed during the field survey, it is expected that any common wildlife species using surrounding habitats would avoid habitats affected by these "spillover" effects, thereby decreasing diversity beyond the actual development envelope.

Construction

During construction, short term indirect impacts may occur to the surrounding buffer area from an increase of noise and construction traffic. As part of the Project design, standard Best Management Practices (BMPs) are to be implemented to provide proper trash receptacles and management of dust/oil/pollutants, as well as limiting construction noise to daytime and typical work days (i.e., non-holidays, not Sunday) based on the City Noise Ordinance as described further in Section 13, Noise. As indicated in the biological resources assessment and in Section 13, a Noise Study (Appendix J) was prepared assessing construction impacts from the Project including impacts to the nearby Reserve property to the southeast. As detailed in both studies, construction noise impacts to the Reserve property were assessed using an impact threshold of 65 dBA based on guidance provided by the (RCA).[1] Based on the analysis contained in the Noise Study, construction of the proposed Project would produce a noise level of 62.9 dBA Leq at Receiver location R8 within the Reserve property. The estimated 62.9 dBA Leq noise level within the Reserve property is below the 65 dBA standard, resulting in a **less than significant impact** directly, indirectly and cumulatively and no mitigation is required.

Indirect impacts due to construction are short in duration only occurring during the construction phase. A majority of the site is surrounded by development and currently experiences ambient roadway noise from existing warehouse and industrial uses. The habitat along the edge of the MSHCP reserve is disturbed and already marginalized through edge effects. Furthermore, no sensitive species were observed within the buffer area of the Reserve during the field survey. The indirect impacts caused by construction activities are not expected to reduce general wildlife below self-sustaining levels within the region and are short-term in duration. Therefore, the Project would not adversely affect special status or sensitive status plant or wildlife species, resulting in a **less than significant impact** directly, indirectly and cumulatively. No mitigation is required.

Operational

Due to the close proximity to the Box Springs Mountain Reserve and its use as a regional wildlife corridor and supporting potential sensitive and common wildlife species, the lighting found on the southern side of the buildings shall be designed to avoid spillover light into the adjacent habitat. Lights located along the south side of the project site, including the building, parking lot, and/or driveway, adjacent to Box Springs Mountain Reserve, shall include shielding and all light shall be directed downward to reduce nightlighting impacts to the surrounding habitat, and other lighting components as outlined within **Mitigation Measure MM AES-1**. As a result, implementation of **MM AES-1** would render operational lighting impacts to **less than significant with mitigation incorporated**. The site is surrounded by development and already contains ambient roadway noise from existing warehouse and industrial uses; therefore, the temporary increase of operational noise would be negligible and is a **less than significant impact**, and no mitigation is required.

These impacts by themselves would not be expected to reduce general wildlife populations below self-sustaining levels within the region; however, with implementation of the **Mitigation Measure MM AES-1**, potential indirect long-term impacts to wildlife movement (including some potential special status species) within the adjacent Box Springs Mountain Reserve Park would reduce potential impacts to a less than significant level.

The Project site consists primarily of disturbed habitat and lacks suitable nesting habitat for sensitive wildlife species. The Project site provides limited suitable habitat for ground nesters and some common avian species. While none of the common

[1] Personal telephone communication and confirmation email between Ray Hussey, President of Enplanners, Inc. and Elizabeth Dionne, Sr. Management Analyst-Management/Monitoring, Western Riverside County Regional Conservation Authority, March 22, 2022.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

species carry a Federal or State listing as threatened or endangered, they are all protected under the Migratory Bird Treaty Act (MBTA) during breeding. Therefore, a pre-construction survey is required in compliance with the MBTA. Implementation of **MM BIO-1** would reduce potential impacts to the avian species to a less than significant level, if nesting individuals are present.

In summary, with implementation of **MM AES-1** and **MM BIO-1** the Project will not affect candidate, sensitive, or special status species. Impacts are considered to be **less than significant with mitigation incorporated** directly, indirectly and cumulatively.

MM BIO-1: Prior to the issuance of any grading permit that would impact potentially suitable nesting habitat for avian species, the project applicant shall retain a qualified biologist and adhere to the following:

1. Vegetation removal activities shall be scheduled outside the nesting season ~~(September 1 to February 14 for songbirds; September 1 to January 14 for raptors)~~ to the extent feasible to avoid potential impacts to nesting birds and/or ground nesters. Therefore, vegetation removal shall be scheduled from September 1 to February 14 for songbirds and from September 1 to January 14 for raptors; and

2. Any construction activities that occur during typical nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat, on-site and within 300-feet surrounding the site (as feasible), be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement ground disturbances. If active nests are identified, the biologist would establish buffers around the vegetation (500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive species). All work within these buffers would be halted until the nesting effort is finished (i.e. the juveniles are surviving independent from the nest). The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within these areas when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.

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?	☐	☐	☐	☒

4b. Response: ***(Source: United States Fish and Wildlife Service. National Wetlands Inventory. https://www.fws.gov/Wetlands/data/Mapper.html)***

No Impact. There are no riparian habitats on the Project site subject to Section 1602 of the California Fish and Game Code, as regulated by CDFW. Also, there are no sensitive natural plant communities present on-site. It should be noted that during the literature review, a blue line drainage was mapped on the south eastern portion of the Project site. During the field survey, the biologists paid special attention to the area of the Topographic mapped blue line drainage alignment. The blue line drainage mapped on the topographic map is known as the Gage Canal. No canal was observed, nor any other features meeting the definition of waters under Section 1602. In the location of the mapped Canal is a dirt road. As a result, **no impact** directly, indirectly, or cumulatively to riparian habitats or other sensitive natural communities will result from the proposed Project's implementation and no mitigation is required.

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?	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

4c. Response: ***(Source: United States Fish and Wildlife Service. National Wetlands Inventory. https://www.fws.gov/Wetlands/data/Mapper.html)***

No Impact. No wetlands or riparian habitats are present on-site or in the surrounding area. No state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) exist on site or within proximity to the Project site. The Project site does not contain any discernible drainage courses, inundated areas, wetland vegetation, or hydric soils and thus does not include U.S. Army Corps of Engineers (USACE) jurisdictional drainages or wetlands. It should be noted that during the literature review, a blue line drainage was mapped on the south eastern portion of the Project site. During the field survey, the biologists paid special attention to the area of the Topographic mapped blue line drainage alignment. The blue line drainage mapped on the topographic map is known as the Gage Canal. No canal was observed, nor any other features meeting the definition of waters under USACE. In the location of the mapped Canal is a dirt road. The proposed Project would have **no impact** directly, indirectly, or cumulatively to state or federally protected wetlands directly, indirectly, or cumulatively and no mitigation is required.

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?	☐	☒	☐	☐

4d. Response: ***(Source: MSHCP, General Plan 2025 –Figure OS-7 – MSHCP Cores and Linkage; Appendix B - Biological Resource Assessment for the Marlborough-Northgate Project, Carlson Strategic Land Solutions, December 2021)***

Less Than Significant with Mitigation Incorporated. The area to the southeast of the Project site (i.e., nearby hillsides and the Box Springs Mountain Reserve) has the potential for some movement of native wildlife. The surrounding site supports potential live-in and movement habitat for species on a local scale (i.e., some limited live-in and marginal movement habitat for reptile, bird, and mammal species). The Project site provides little to no function to facilitate wildlife movement on a regional scale and is not identified as a Special Linkage area within the MSHCP. Movement on a local scale likely occurs with species adapted to urban environments due to the surrounding development and disturbances in the vicinity of the site. Although implementation of the Project would result in disturbances to local wildlife movement within the site, those species adapted to urban areas would be expected to persist on-site following construction. Due to the close proximity to the Reserve and its use as a regional wildlife corridor supporting potential sensitive and common wildlife species, the lighting to be installed on the southern side of the buildings shall be designed consistent with existing City requirements to avoid spillover light into the adjacent habitat. Lights located along the south side of the project site, including the building, parking lot, and/or driveway, adjacent to the Reserve, shall include shielding and all light shall be directed downward to reduce night lighting impacts to the surrounding habitat, and other lighting components as outlined within previously referenced **MM AES-1** in Section 1 Aesthetics. As such, impacts associated with the movement of species and wildlife corridors are considered to be **less than significant with mitigation incorporated** directly, indirectly, or cumulatively.

The Project site supports potential foraging habitat and limited nesting habitat (ground nesters) for migratory birds, in addition to potential foraging habitat for raptors. Based on the disturbed nature of the site, the quality of foraging habitat is considered to be low. Therefore, impacts to foraging habitat would be considered **less than significant.** No mitigation measures are considered required.

The site has the potential to support avian ground nests due to the lack of vegetation and limited ground cover. Nesting activity typically occurs from February 15 to August 31. Disturbing or destroying active nests is a violation of the MBTA (16 U.S.C. 703 et seq.). In addition, nests and eggs are protected under Fish and Wildlife Code Section 3503. As such, direct impacts to breeding birds (e.g. through nest removal) or indirect impacts (e.g. by noise causing abandonment of the nest) is considered a potentially significant impact. Compliance with the MBTA would reduce impacts to a less than significant level, as detailed in previously referenced **MM BIO-1**.

In summary, with implementation of **MM AES-1** and **MM BIO-1**, long-term affects to wildlife movement including migratory birds are considered to be **less than significant with mitigation incorporated** directly, indirectly and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒

4e. Response: ***(Source: City of Riverside Urban Forest Tree Policy Manual)***

No Impact. The Project is not subject to any City policies, such as a tree preservation ordinance. Therefore, **no impact** directly, indirectly, or cumulatively is anticipated and no mitigation is required.

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?	☐	☒	☐	☐

4f. Response: ***(Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), and Stephens' Kangaroo Rat Habitat Conservation Plan)***

Less Than Significant Impact with Mitigation Incorporated. The Project site is located within the MSHCP; however, it is not located within any MSHCP Criteria Areas, Cell Groups, or Subunits. Furthermore, the Project site is not located in survey areas for Amphibians, Mammals, Narrow Endemic Plants Overlay, or Special Linkage areas. The Project site is subject to Riparian, Riverine, and Western Burrowing Owl areas.

According to the field survey done by CSLS in December, 2020, there are no features identified on the Project site that are considered riparian and/or riverine, nor meet the definition of riparian and/or riverine per MSHCP. It should be noted that during the literature review, a blue line drainage was mapped on the south eastern portion of the Project site. During the field survey, the biologists paid special attention to the area of the Topographic mapped blue line drainage alignment. The blue line drainage mapped on the topographic map is known as the Gage Canal. No canal was observed, nor any other features meeting the definition of riparian/riverine features per the MSHCP. In the location of the mapped Canal is a dirt road. In addition, the Project site does not contain suitable habitat for any of the riparian/riverine vernal pool species, including listed fairy shrimp. Furthermore, based on the field survey it was determined the Project site does not contain suitable habitat for the California ground squirrels and the BUOW, as the site lacked necessary sized burrows and vegetation cover. No BUOWs or evidence of BUOWs were observed on site or within the surrounding 500-feet during the Habitat Assessment, and much of the 500-foot buffer is developed with industrial buildings and warehouses. Based on the lack of evidence of species, suitable habitat, Project site maintenance, and the surrounding built environment, it is determined that the Project is consistent with MSHCP.

The Project site is not located within an existing or proposed MSHCP Conservation Area, however the site is immediately adjacent to the Reserve to the southeast, which is an existing MSHCP Conservation Area. The Reserve allows for the regional movement of species; and therefore, interface with wildlands which functions as regional movement. Below is a MSHCP Consistency Analysis and these impacts by themselves would not be expected to interfere with the wildlands interface within the region. However, the following Urban/Wildland Interface Guidelines will be implemented through the MSHCP Conditions of Approval.

<u>Water Quality/Hydrology</u>

The Project will comply with all applicable water quality regulations and Best Management Practices through Project Stormwater Pollution Prevention Plan (SWPPP) and Water Quality Management Plan (WQMP).

<u>Toxics</u>

Toxic sources within the Project Site would be limited to those commonly associated with commercial activities such as pesticides, insecticides, herbicides, fertilizers, and vehicle emissions. The project will comply with all applicable water quality regulations to ensure adequate long-term treatment and direction of water away from the Reserve.

<u>Lighting</u>

Night lighting associated with the proposed Project Site improvements that are adjacent to the Reserve would be directed downward as outlined within previously referenced **MM AES-1** to reduce potential indirect impacts to wildlife species.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

Noise

The MSHCP requires that noise generating land uses affecting the MSHCP Conservation Area shall incorporate setbacks, berms or walls to minimize the effects of noise on MSHCP Conservation Area resources pursuant to applicable rules, regulations, and guidelines related to land use noise standards. For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards. Since the proposed Project development will include noise generating activities, operational noise levels have been calculated at receiver locations within the Reserve as analyzed in Appendix J, *Marlborough Northgate Business Center Noise Impact Analysis, City of Riverside*, prepared by Urban Crossroads, dated April 2022.

As discussed previously, construction noise impacts to the Reserve property were assessed using an impact threshold of 65 dBA based on guidance provided by the RCA. During construction, noise will occur through site preparation, grading, paving operations, and traffic. Additionally, no blasting is proposed with the Project. Based on the analysis contained in the Noise Study, construction of the proposed Project would produce a noise level of 62.9 dBA Leq at Receiver location R8 within the Reserve property. The estimated 62.9 dBA Leq noise level within the Reserve property is below the 65 dBA standard, resulting in a **less than significant impact** directly, indirectly and cumulatively and no mitigation is required.

Operational noise associated with the Project includes loading dock activity, truck movement, roof-top air conditioning units, parking lot vehicle traffic, and trash enclosure activity. Based on these activities, hourly noise levels at Receiver location R8 within the Reserve range from 44.2 dBA L_{eq} for daytime and 44.2 dBA L_{eq} for nighttime noise. Consistent with MSHCP guidance, the City's Residential Noise standard of 55 dBA L_{eq} daytime and 45 dBA Leq nighttime was used for the analysis; therefore, operational noise associated with the proposed Project does not exceed the MSHCP noise standard within the Reserve. Additionally, the site is surrounded by development and already contains ambient roadway noise from existing warehouse and industrial uses therefore, the minimal increase in operational noise would be negligible and is considered to be a **less than significant impact** directly, indirectly and cumulatively, and no mitigation is required.

Invasive Species

As part of Project design, the landscape plans do not utilize any invasive species adjacent to the Reserve.

Implementation of the aforementioned guidelines and **MM AES-1** and **MM BIO-1** will minimize Project indirect impacts to a less than significant level, and the Project would be consistent with MSHCP.

5. CULTURAL RESOURCES

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☒	☐	☐

5a. Response: ***(Source: General Plan 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas and Appendix D, Title 20 of the Riverside Municipal Code, Appendix C - Cultural and Paleontological Resources Assessment)***

Less Than Significant Impact with Mitigation Incorporated. The *Cultural and Paleontological Resources Assessment,* prepared for the Project indicated the site is not located within a historic district or a neighborhood conservation area nor did the field survey on February 27, 2021 yield any cultural resources within the Project boundary. However, the Project area had one previously recorded cultural resource (P33- 006940) and six recorded cultural resources within 1⁄2 mile of the Project.

Resource P33-006940, also known as the Boffing House, formerly occupied the Project site and was recorded in 1982. In 2000 it was evaluated and determined to be not eligible for the California Register of Historical Resources, nor eligible as a City Landmark or Structure of Merit. The building was demolished in 2006.

The Gage Canal, resource P33-004768, is located immediately adjacent to the south side of the Project site, was constructed by Mathew Gage between 1884 and 1888 which spanned twenty miles from the Santa Ana River near present-day Loma Linda to the Arlington Heights neighborhood in Riverside. This canal ultimately was the key water source leading to Riverside's 1890s boom in agricultural and residential development. For these reasons, the Gage Canal was designated a local historical

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

landmark (Landmark No. 24) by the City of Riverside on November 10, 1976. The Gage Canal is eligible for listing on the National Register of Historic Places (NRHP) and is therefore considered a significant historic resource.

The Project site was characterized as containing a low sensitivity for cultural (prehistoric) resources and a moderate to high sensitivity for historic resources due to the former occupation by the Boffing House. Any disturbance of native soils has a moderate potential to directly impact unknown historical resources that could create an impact. For this reason, mitigation in the form of the presence of an archaeological monitor during initial ground disturbances is required. Implementation of **MM CUL-1-4** would result in a **less than significant impact with mitigation incorporation** directly, indirectly, or cumulatively.

MM-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.

MM-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.

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:
    a. Project grading and development scheduling;
    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;
    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;
    d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and
    e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.

MM-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:

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.

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

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

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:

    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;

    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;

    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

    d) 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.

MM-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.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to § 15064.5 of the CEQA Guidelines?	☐	☒	☐	☐

5b. Response: ***(Source: General Plan 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity, Appendix C - Cultural and Paleontological Resources Assessment)***

Less Than Significant Impact with Mitigation Incorporated. As discussed above in response 5a, a records search and a pedestrian survey of the property was conducted by Duke CRM to identify archaeological resources within and around the Project boundaries. Although the field survey did not yield any resources within the Project boundary, the records search showed 21 cultural resources within a 1⁄2-mile radius of the Project. Of the 21 cultural resources, three covered portions of the Project site and the other 18 are within a 1⁄2-mile radius of the Project site.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
The three resources that covered the project are the Boffing House, Hunter Park study area, and the Gage Canal. Similar to response 5a, because there is potential to unearth such resources during initial ground disturbance, implementation of previously referenced **MM CUL-2** would result in a **less than significant impact with mitigation incorporated** directly, indirectly, or cumulatively.				
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

5c. Response: ***(Source: General Plan 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity, Appendix C - Cultural and Paleontological Resources Assessment)***

Less Than Significant Impact. No known human remains were discovered on the proposed Project site during field surveys and there are no facts or evidence to suggest Native Americans or people of European descent are buried on the subject site. Furthermore, the proposed Project site is not located on any known cemetery. Conditions on site remain substantially unchanged and undeveloped. The City of Riverside includes a standard Condition of Approval for the inadvertent discovery of human remains, requiring compliance with State law. Therefore, if human remains are encountered during construction, the construction contractors, Project Archaeologist, and/or designated Native American Monitor shall follow the steps included in the State law to ensure potential impacts to unknown buried human remains would be rendered **less than significant** directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

6a. Response: ***(Source: California Building Code, California Energy Commission – California Commercial End Use Survey; Metrolink, Stations, Stations, https://metrolinktrains.com/rider-info/general-info/stations/; Riverside Transit Agency, Route Info, https://www.riversidetransit.com/index.php/route-info)***

Less Than Significant Impact. The proposed Project may impact energy resources during construction and operation. Energy resources that would be potentially impacted by land use development projects result from energy demand for electricity, natural gas, vehicle and equipment fuels, and utility distribution. The proposed Project would comply with existing, applicable City and State regulatory compliance measures related to air pollution and greenhouse gas emissions reduction, trip and trip length reduction, and water efficiency which all promote the efficient use of energy. The Project would also be constructed in accordance with all applicable City and State building codes that require use of energy efficient designs and materials resulting in the conservation energy. These existing regulatory compliance measures establish an inherent baseline of energy efficiencies common to all development projects in the City.

Construction Energy: Construction activities will require short-term and therefore limited energy consumption and are not expected to have an adverse impact on available energy supplies and infrastructure. Electricity demand during construction will be temporary, nominal, and will cease upon the completion of construction. Electricity will be supplied by a temporary connection to the City's existing power lines near the Project site, anticipated to be on the south frontage of Marlborough Avenue at Northgate Street. Natural gas typically is not consumed during construction. Construction impacts associated with the installation of natural gas connections will be confined to trenching in order to place the lines below surface. By coordinating with the Southern California Gas Company to identify locations and depths of all existing gas lines, the Project

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

will not disrupt local gas service. While it is difficult to measure the energy used in the production of construction materials such as asphalt, steel, and concrete, it is reasonable to assume that the production of building materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business. The proposed Project would have a **less than significant impact** directly, indirectly, or cumulatively related to electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during construction. No mitigation is required.

Operation Energy: Energy would be consumed during Project operations related to space and water heating, water conveyance, solid waste disposal, inbound and outbound trucks trips, and vehicle trips of employees and customers. The proposed Project would be required to comply with applicable federal, state, and local standards promoting energy efficiency including Title 24 building code standards. For example, these energy-efficiency standards include installation of insulated and glazed windows and low E coating on windows. The proposed Project would not result in the inefficient, wasteful, or unnecessary consumption of building energy. Additionally, there would not be any inefficient, wasteful, or unnecessary energy usage in comparison to similar development projects of this nature regarding construction-related fuel consumption. Therefore, implementation of the proposed Project would result in **less than significant impacts** on energy resources.

The roadway network in the vicinity of the project site is served by Metrolink, the regional public transit rail agency serving the City and greater Southern California plus portions of Ventura and San Diego Counties. The Riverside-Hunter Park/UCR Metrolink Station is located on the north side of Marlborough Avenue at the Rustin Avenue terminus and functions as the northernmost station of the Perris Valley Line and extends from Perris to Union Station with transfer locations along the route. The Riverside Transit Agency (RTA) provides fixed bus route service in western Riverside County. Several routes serve the Project area, with Route 13 the closest route with a bus stop at the Marlborough Avenue/Rustin Avenue intersection providing connecting to the RTA system. Employees destined to and from the proposed Project would have the opportunity to access the Project site via the public transit Metrolink and RTA systems, thereby reducing transportation-related fuel demand.

Continued use of energy resources is consistent with the anticipated growth within the city and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider. The proposed project would have a **less than significant impact** directly, indirectly, or cumulatively related to electricity, natural gas, or transportation energy supply and infrastructure capacity energy resources during operation. No mitigation is required.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

6b. Response: ***(Source: California Building Code, California Energy Commission – California Commercial End Use Survey)***

Less Than Significant Impact. As stated in response to 6a, the proposed Project will be designed and constructed in accordance with the City's Building Code requirements that are consistent with the California Green Building Standard. The Project would include new light standards and fixtures to provide a minimum level of nighttime lighting to reduce impacts to nearby biological resources while maintaining an adequate lighting for safety purposes. This lighting will conform to all State and local building code and lighting regulations. As a result, the potential impacts are considered to be **less than significant** directly, indirectly, or cumulatively and no mitigation is required**.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS				
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning	☐	☐	☒	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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.				

7ai. Response: ***(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR California Department of Conservation. Table 4; and, Cities and Counties Affected by Alquist-Priolo Earthquake Fault Zones as of January 2010)***

Less Than Significant Impact. In the City of Riverside, there are no Alquist-Priolo fault zones. The nearest Alquist-Priolo fault is the Elsinore Fault located approximately 12.8 miles south of the Project site. This fault trace is part of the larger San Jacinto Fault Zone. Other fault traces include the County Fault, which is located approximately 17.8 miles east of the Project site and the San Jacinto Fault located approximately 17 miles east of the Project site. The Project site does not contain any known fault lines and the potential for fault rupture is low, resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

ii. Strong seismic ground shaking?	☐	☐	☒	☐

7aii. Response: ***(Source: General Plan 2025 FPEIR)***

Less Than Significant Impact. Seismic activity is to be expected in Southern California. The California Building Code contains building standards and regulations for each region of the state based on the magnitude of earthquakes anticipated for the region. The building standards result in the design and construction of structures capable of withstanding an acceptable strength of an earthquake for each region of the state. Compliance with the California Building Code regulations will result in a **less than significant impact** directly, indirectly, or cumulatively related to strong seismic ground shaking and no mitigation is required. Seismic activity is to be expected in Southern California.

iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

7aiii. Response: ***(Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR; and Figure PS-3 – Soils with High Shrink-Swell Potential)***

Less Than Significant Impact. The Project site is located in an area with low potential for liquefaction as depicted in the City's General Plan 2025 *General Liquefaction Zones* – Figure 5.6-3. As discussed in response 7aii, compliance with the California Building Code regulations will result in a **less than significant impact** directly, indirectly, or cumulatively related to seismic-related ground shaking, including liquefaction, and no mitigation is required.

iv. Landslides?	☐	☐	☒	☐

7aiv. Response: ***(Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope; Appendix D - Geotechnical Engineering Report, Proposed Marlborough Northgate Business Center Project)***

Less Than Significant Impact. The Project site and its surroundings are at the base of a hillside, but are not located in an area prone to landslides per Figure 5.6-1 of the General Plan 2025 FPEIR. Although this area is not subject to landslides, Project construction involves a CMU retaining wall extended into the hillside to the south of the site to increase buildable acreage and added slope stability. As such, the CMU wall is to be designed and constructed in accordance with standard City and State building code. The Project's construction also involves transition grading within and between developed area or areas outside the limits of work and the Project site would create smooth and even transitions of the ground surface. Construction would also require additional minor fills or cut, conditioned and compacted as required in accordance with the Geotechnical Engineering Report prepared for the Project, to create these surfaces. As a result of the Project grading plans to further stabilize onsite soil conditions, impacts will be **less than significant** directly, indirectly, or cumulatively and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

7b. Response: ***(Source: General Plan 2025 EIR 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)***

Less Than Significant Impact. The Project's construction would not result in substantial soil erosion or the loss of topsoil since the Project Applicant would be required to adhere to Section 14.12.315(H) of the City's Municipal Code, which states that "no person or business shall allow runoff containing pollutants associated with construction sites, activities, materials, or waste." Erosion and sediment control methods will be implemented as part of the Project's Storm Water Pollution Prevention Plan (SWPPP) that is a required for construction activities. The Project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. With the grading and erosion control standards for which all development activity must comply in the Subdivision Code (Title 18, Chapter 18.200) and the Grading Code (Title 17, Chapters 17.16 and 17.28), implementation of measures designed to minimize soil erosion will occur in accordance with the SWPPP. Compliance with State and federal requirements as well as with Titles 18 and 17 of the City's Code will ensure that soil erosion or loss of topsoil will result in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

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?	☐	☐	☒	☐

7c. Response: ***(Source: General Plan 2025 EIR Figure 5.6-4 –Soils, Table 5.6-B – Soil Types; Appendix D - Geotechnical Engineering Report, Proposed Marlborough Northgate Business Center Project)***

Less Than Significant Impact. The Project site is on a vacant parcel and construction will involve minimal clearing and grubbing of existing vegetation and light debris. The proposed grading and development shall meet all requirements of the City Building Code that will result in the reduction of settlement under Project design loads with proper conditioning and compaction of cut and fill soils in accordance with the Geotechnical Engineering Report. Furthermore, blasting is not expected to occur due to bedrock was encountered at depths beyond the required excavation depths as stated in the Geotechnical Engineering Report. Therefore, the likelihood of on-site landslides, lateral spreading, subsidence, liquefaction or collapse is considered to be remote. As a result, the potential impacts are anticipated to be **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

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?	☐	☐	☒	☐

7d. Response: ***(General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 EIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils)***

Less Than Significant Impact. The Project site is underlain with alluvial soil deposits containing minimal amounts of clay associated with shrink-swell potential. According to Figure PS-3 of the City's General Plan 2025, the Project site is not within a high shrink-well potential zone. As a result, a **less than significant impact** directly, indirectly, or cumulatively would occur related to expansive soils and no mitigation is required.

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?	☐	☐	☐	☒

7e. Response: ***(Source: General Plan 2025 EIR Figure 5.6-4 – Soils, Table 5.6-B – Soil Types)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. No septic tanks would be used as part of proposed Project. As a result, **no impact** associated with the use of septic tanks would occur directly, indirectly, or cumulatively as part of the proposed Project's implementation and no mitigation is required.				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

7f. Response: ***(Source: General Plan 2025 Policy HP-1.3, and Southern California Geotechnical. Geotechnical Investigation for Proposed Warehouse. Report dated February 23, 2017; Appendix C - Cultural and Paleontological Resources Assessment)***

Less Than Significant Impact with Mitigation Incorporated. The soils that underlie the Project site consist of old alluvial-fan soil deposits. The records searches indicate there are no fossil records that have been recorded within the Project limits. The search revealed there is one fossil record within three miles of the Project site that contains soil deposits similar to those underlying the Project. Consequently, these soils at depth are old enough to have a high sensitivity for containing significant paleontological resources. Due to the quantity of soil to be cut from the hillside in the southern portion of the site, the likelihood of encountering paleontological resources is considered high given the potential for unearthing and impacting high-sensitivity deposits. Paleontological monitoring is required during initial ground disturbances that reach five (5) feet in depth or more, to ensure significant resources are not impacted. With implementation of paleontological construction monitoring, the Project will not affect significant paleontological resources. Implementation of **MM CUL-2** will result in a **less than significant impact with mitigation incorporated** directly, indirectly and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS				
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐

8a. Response: ***(Source: Appendix E –Marlborough Northgate Business Center Greenhouse Gas Assessment)***

Less Than Significant Impact: Overall, the following activities associated with the proposed Project could directly or indirectly contribute to the generation of GHG emissions:

- **Construction Activities:** During construction of the Project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicle trips.
- **Gas, Electricity, and Water Use:** Natural gas use results in the emission of two GHGs: CH_4 (the major component of natural gas) and CO_2 (from the combustion of natural gas).
- **Solid Waste Disposal:** Solid waste generated by the Project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees.
- **Motor Vehicle Use:** Transportation associated with the proposed Project would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

Construction: Project construction will be temporary but will generate GHG emissions. Construction activities will result in the emission of GHGs from equipment exhaust, construction-related vehicular activity and construction worker automobile trips. However, construction GHG emissions will be short-term and negligible when averaged over 30-years.

Operations: The Project would include minimal interior office space and therefore interior electricity, lighting, water, and HVAC would be minimal. The Project will also require minimal exterior lighting for safety. The proposed landscaped areas

will require watering. These operational activities of the Project will result in the generation of GHG emissions, these emissions will be very small. Existing State and federal regulations, including the California Building Code, regarding the energy efficiency of buildings, appliances, and lighting, reduce the electricity demand from new development. The Project will also generate GHG emissions from mobile sources (trucks and passenger vehicles). Truck and passenger vehicle emissions are reduced by numerous regulations that affect both the cleanliness of fuels and the eventual tailpipe emissions.

The estimated GHG emissions for the proposed Project are summarized below on Table 8.a-1.

Table 8.a-1: Proposed Project GHG Emissions

Source	Emissions (MT/yr)			
	CO_2	CH_4	N_2O	Total CO_2e
Annual construction-Related Emissions Amortized Over 30 Years	23.52	3.01E-03	1.47E-03	24.04
Area Source	9.13E-03	2.00E-05	0.00	9.72E-03
Energy Source	530.02	0.02	4.97E-03	531.96
Mobile Source	932.25	0.03	0.07	954.49
On-Site Equipment Source	50.75	0.02	0.00	51.16
Water Source	25.16	1.49	0.00	62.41
Water Usage Source	123.19	0.76	0.02	147.62
Total CO_2e (All Sources)	**1,771.68**			

Source: *Appendix A - Marlborough Northgate Business Center Greenhouse Gas Assessment*, Urban Crossroads, April 2022.

The City of Riverside has not adopted thresholds of significance with respect to GHG emissions. However, the South Coast Air Quality Management District (SCAQMD) developed draft screening thresholds for local agencies including a screening threshold of 10,000 $MTCO_2e$/yr for industrial projects.[2] Use of SCAQMD's draft recommendations has become a widely accepted practice by lead agencies, such as the City, that have not adopted thresholds of significance with respect to GHG emissions. For this reason, a 10,000 $MTCO_2e$/yr threshold has been used as a screening threshold for the proposed Project. As shown in Table 8.a-1, the proposed Project would generate a total of approximately 1,771.68 $MTCO_2e$/yr. As a result, the sum of Project construction and operational GHG emissions will be well below the 10,000 $MTCO_2e$ significance threshold. Therefore, the net increase in GHG emissions resulting from implementation of the proposed Project would result in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

b. Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

8b. Response: ***(Source: Appendix E –Marlborough Northgate Business Center Greenhouse Gas Assessment; Riverside Restorative Growthprint-Climate Action Plan, 2015)***

Less Than Significant Impact. The City adopted its Riverside Restorative Growthprint- Climate Action Plan (RRG-CAP) in 2016. The RRG-CAP includes policies and measures that the City implements to achieve the reduction targets required by the State's GHG reduction goals. However, the RRG-CAP does not include a process for confirming a project's consistency with the plan.

At the state level, the California Air Resources Board (CARB) released the Final 2017 Scoping Plan Update, which identifies the State's post- 2020 GHG reduction strategy. The Project would not conflict with any of the 2017 Scoping Plan elements as any regulations adopted would apply directly or indirectly to the Project. Further, recent studies show that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40% below 1990 levels by 2030, and meet the established goal.

[2] *Draft Guidance Document - Interim CEQA Greenhouse Gas (GHG) Significance Threshold*, SCAQMD, 2008.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

The Project will comply with and implement applicable and required measures included in the following four primary sectors in the RRG-CAP.

- Energy: Promote energy efficiency and renewable energy for municipal operations and the community.
  - Measure SR-2: 2013 California Building Energy Efficiency Standards (Title 24, Part 6): *Mandatory energy efficiency standards for buildings.*
- Transportation and Land Use: Measures to reduce single-occupancy travel, increase non-motorized travel, improve transit access, encourage alternative fuels, and promote sustainable growth patterns.
  - *Measure T-4: Promotional Transportation Demand Management: Encourage Transportation Demand Management strategies.*
- Water: Measures to reduce water demand by community and municipal operations and to conserve potable water.
  - *Measure W-1: Water Conservation and Efficiency: Reduce per capita water use by 20% by 2020.*
- Solid Waste: Measures to reduce solid waste during construction and operational activities.
  - Measure SR-13: Construction & Demolition Waste Diversion: *Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 90% of C&D waste from landfills by 2035.*

These measures are intended to reduce GHG emissions. These and other related measures are implemented through project compliance with existing applicable procedures. Specifically, various building design efficiency elements and building practices that reduce energy use, water use, and solid waste generation are implemented through the City's development review and building plan check process. For example, the California Energy Code (Title 24 of the CBC) establishes numerous energy efficiency specifications and building energy efficiency standards that reduce building energy use and in turn GHG emissions. In addition, the Project is consistent with the general use designation, density, building intensity, and applicable policies specified for the Project area in SCAG's Sustainable Community Strategy/Regional Transportation Plan, which pursuant to SB 375 calls for the integration of transportation, land-use and housing policies to plan for achievement of the GHG- emissions target for the region. As discussed in 17. Transportation, the Project is required to install a crosswalk on Marlborough Avenue at Rustin Avenue providing safe pedestrian access from the south side of the street to the Metrolink terminal located on the north side of the street at Rustin Avenue. The crosswalk would enhance use of transit by Project employees as well as existing employees in the vicinity resulting in reduced vehicle miles traveled and associated reductions in energy use and GHG emissions. Thus, a **less than significant impact** related to GHG emissions from Project construction and operation would occur and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS & HAZARDOUS MATERIALS				
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

9a. Response: ***(Source: General Plan 2025 Public Safety Element; GP 2025 EIR; California Health and Safety Code; Title 49 of the Code of Federal Regulations; Title 13 of the California Code of Regulations; California Building Code)***

Less Than Significant Impact. Similar to the construction of any development project, construction of the proposed Project has the potential to create a hazard to the public or environment through the routine transportation, use, and disposal of construction-related hazardous materials such as fuels, oils, solvents, and other materials typically delivered to and used at construction sites. These commonplace materials are typical of materials delivered to construction sites. In the unlikely event regulated hazardous materials are transported to the site and used during construction, the United States Department of Transportation, Office of Hazardous Materials Safety, stipulates strict regulations ensuring hazardous materials are safely

transported (Title 49 of the Code of Federal Regulations) as implemented in California by Title 13 of the California Code of Regulations (CCR). With adherence to these regulations resulting in the proper handling of any hazardous materials delivered to the site, a significant threat to the safety of motorist and truckers along the transport route during transport and employees at the adjacent industrial oriented land uses during delivery would not occur.

Once operational, small quantities of hazardous materials may be stored and used on the site typical of any light industrial business such as fuels, oils, solvents, adhesives, pesticides, electronic waste, and other materials . However, due to the limited quantities of these materials to be used once the Project is operational, they are not considered hazardous to the public at large. Compliance with applicable Federal, State and local laws, including approval of a required Hazardous Material Business Plan submitted to the City's Fire Department related to the use, storage, and/or handling of hazardous material or a mixture containing a hazardous material in reportable quantities, the likelihood and severity of accidents would be reduced to an accepted level.

With adherence to these existing regulations, the use and storage of hazardous materials during construction and operations would be reduced resulting in a **less than significant impact** directly, indirectly, or cumulatively. No mitigation is required.

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?	☐	☐	☒	☐

9b. Response: ***(Source: General Plan 2025 Public Safety Element, GP 2025 EIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code)***

Less Than Significant. As discussed in response 9a, the Project may involve the limited use of hazardous materials during construction and operations. Compliance with applicable Federal, State, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous materials will reduce risks from release of hazards to the environmental to an accepted level, resulting a **less than significant impact** directly, indirectly, or cumulatively. No mitigation is required.

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

9c. Response: ***(Source: General Plan 2025 Public Safety and Education Elements, GP 2025 EIR 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, Title 49 of the Code of Federal Regulations, California Building Code)***

Less Than Significant Impact. There are no schools within one-quarter mile of the Project site. The nearest school is University Heights Middle School located approximately 1.6 miles to the southwest on Massachusetts Avenue. The proposed development does not pose a potential health risk to nearby existing or proposed schools. Use of hazardous materials during construction and occupation of the proposed Project, as stated in response 9a, would be subject to applicable existing federal, State, and local statutes and regulations. Compliance would ensure that children, teachers, staff, and visitors at University Heights Middle School are not exposed to hazardous materials, resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

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?	☐	☐	☐	☒

9d. Response: ***(Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites; GP 2025 EIR Table 5.7-A – CERCLIS Facility Information and Figure 5.7-B – Regulated Facilities in TRI Information; Appendix F - Phase I Environmental Site Assessment and Limited Site Investigation, Proposed Marlborough Northgate Business Center Buildings)***

Less Than Significant. The *Phase 1 Environmental Site Assessment and Limited Site Investigation, Proposed Marlborough Northgate Business Center Buildings Southwest of Marlborough Avenue and Northgate Street Riverside* (Phase I ESA) prepared for the Project site noted the site was planted with citrus groves in the early 1900s and around 1938 a home was

constructed on the northeastern portion of the site. As discussed in Section 5 Cultural Resources, the home was known as the Boffing House (Resource P33-006940), recorded in 1982, evaluated in 2000 and determined to be not eligible for the California Register of Historical Resources nor eligible as a City Landmark or Structure of Merit. The house was demolished in 2006.

A review of the Federal, State and local environmental databases was conducted and no RECs were identified onsite as well as on adjoining, off-site locations. The site reconnaissance conducted as part of the Phase I ESA notes the Project site was vacant and unoccupied, contained minor amounts of miscellaneous household debris, three piles of construction debris, and two vertical irrigation standpipes. Laboratory analysis of shallow soil samples did not reveal a recognized environmental condition (REC) in connection with the site. Levels of pesticide and herbicide concentrations that may have been used on site for the citrus orchard operation as well as the residential use were non-detectable or below the residential and commercial Environmental Screening Levels. Based on the review of historical uses on the Project site and review of environmental databases, the Project site and adjoining properties do not contained an REC and no additional environmental investigation is required. Therefore, ground disturbance during Project construction is not anticipated to create a significant hazard to the public or environment, resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

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?	☐	☐	☒	☐

9e. Response: ***(Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas; March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan (2014), Air Installation Compatible Use Zone Study for March Air Reserve Base (August 2005), Flabob Airport Compatibility Plan http://www.rcaluc.org/Portals/13/PDFGeneral/plan/newplan/14-%20Vol.%201%20Flabob.pdf.)***

Less Than Significant Impact. The Project site is not located within two miles of a private or public use airport. Flabob Airport is located approximately 6.2 miles to the west and the March Inland Port (MIP) Airport within March Air Reserve Base is located approximately 7.5 to the southeast of the Project site. The Project site is not located within the Runway Protection Zone (RPZ) of Flabob Airport. The proposed Project would not introduce a building that would interfere with the approach and take-off of airplanes utilizing Flabob Airport and would not risk the safety of people working on-site. The Project site is not located within any 60 Community Noise Equivalent Level (CNEL) contour line boundaries of Flabob Airport. According to General Plan, Figure PS-6B, the Project site is located within the Other Airport Environs for the MIP Airport, defined as Zone E in the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan characterized by low impact from aircraft noise. Due to the location of the Project site on the base of the northwest slopes of the Box Springs Mountains, aircraft activity at MIP would fly at elevations higher than the peak of the mountain and therefore much higher than the elevation of the Project site and proposed structures. The Project will not interfere with planes using the MIP Airport due to the Project's height and the distance to March airport. As a result, the proposed Project would not present a safety or noise hazard related to aircraft or airport operations at a public use airport to people working in the Project area and a **less than significant impact** would occur directly, indirectly, or cumulatively. No mitigation is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

9f. Response: ***(Source: GP 2025 FPEIR Chapter 7.5.7 – Hazards and Hazardous Materials; 2019 California Fire Code Section 503; Appendix G: Marlborough Northgate Business Center Fire Protection Plan)***

No Impact. The Project will be served by existing, fully improved streets such as Marlborough and Iowa Avenues, as well as nearby local streets and private driveways. All streets in the Project vicinity have been previously designed and constructed in accordance with City Public Works and Fire Departments specifications, and the Project will not affect any of them. The Project is on a vacant site that will be improved with paved driveways with adequate width for emergency access and emergency vehicle maneuverings onsite.

As mentioned, the proposed Project would be constructed and operated in accordance with the City's Emergency Operations Plan to ensure a coordinated and effective planned response by the City Police and Fire Departments to extraordinary emergency situations and disasters. The proposed Project will comply with the 2019 California Fire Code Section 503-Fire

Apparatus Access Roads including Sections 503.1.1 Buildings and Facilities and 503.2.1 Dimensions. It should be noted that construction of the Project will not require any street closures. The Project will have **no impact** directly, indirectly, and cumulatively on emergency response or evacuation plans and no mitigation is required.

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

9g. Response: ***(Source: Appendix G: Marlborough Northgate Business Center Fire Protection Plan; General Plan 2025 Figure PS-7 – Fire Hazard Areas)***

Less Than Significant Impact with Mitigation Incorporated. The proposed Project is in a Very High Fire Hazard Severity Zone (VHFHSZ) in a Local Responsibility Area (LRA) of the City based on Fire Hazard Severity maps from CALFIRE. Due to the location of the site within a VHFHSZ, the *Marlborough Northgate Business Center Fire Protection Plan* (FPP) was prepared by Jensen Hughes, Inc., on November 11, 2021, for the proposed Project (Riverside Fire Department approval December 7,2021). The purpose of the FPP is to assess potential impacts from wildfire hazards, and identify necessary measures to prevent and/or mitigate those hazards in accordance with the 2019 California Fire Code and 2019 California Building Code as adopted by the City. The goal of the FPP is to identify suitable wildfire mitigation measures to protect life and property at an acceptable level of risk as defined in the analytical details of the FPP. The FPP utilizes a "systems approach" to identify applicable fire protection measures, providing details regarding general fire protection features and site-specific fire protection features. This includes implementation of vegetation management procedures and installation of private fire hydrants for fire-suppression support. The FPP presents the general and site-specific fire protection features organized in five categories as follows:

1. Building Fire Resistance and Construction Type
2. Structurally Hardening
3. Defensible Space
4. Fuel Modification Plan
5. Fire Protection Systems
6. Fire Department Access

Given the existing wildfire environment surrounding the Project site, expected wildfire behavior, the fire and wildfire protection measures identified in the FPP, and the availability of nearby firefighting resources, discussed further in Public Services Section 15, there is a low potential of a negative outcome from a wildland fire burning adjacent to the proposed Project. Implementation of the fire and wildfire protection measures contained in the FPP as enumerated in **Mitigation Measure MM HAZ-1** through **MM HAZ-7** would result in a **less than significant impact with mitigation incorporated** directly, indirectly, and cumulatively.

MM HAZ-1: **Building Fire Resistance and Construction Type**: All buildings shall be constructed to meet the classification of Type IIIB, which includes two 2-hour fire rated exterior walls and will comply with provisions of Section 703.2 of the 2019 CBC.

MM HAZ-2: **Structural Hardening:** The Project site and associated buildings shall be designed to satisfy CBC Chapter 7A requirements for materials and construction methods for exterior wildfire exposure**.** Prescriptive requirements from Chapter 7A and Chapter 15 are summarized below:

- **Roofing (Section 705A)**
  - Spaces between roof decking and covering shall be blocked to prevent embers from catching.
  - Eaves and soffits shall be protected with ignition-resistant or non- combustible materials
  - Rain gutters shall be screened or enclosed to prevent accumulation of plant debris. Metal gutters shall be provided.
- **Roofing (Section 1505.1)**
  - The roof shall be composed of Class A materials, such as asphalt composition shingles, tile or metal/steel.
- **Vents (Section 706A)**
  - All vent openings shall be covered with 1/16" to 1/8" metal mesh as a minimum. Vents with wire mesh AND baffles are best, as well as, vents marketed specifically as ember resistant and approved by the CA State Fire Marshal. Fiberglass or plastic mesh shall not be used
  - Vents in eaves or cornices shall be protected with baffles to block embers.

- Chimney and stovepipe outlets shall be covered with a non-combustible screen. This could include metal screen material with openings no smaller than 3/8 inch and no larger than 1⁄2 inch to prevent embers from escaping and igniting a fire.

- **Exterior Covering (Section 707A)**
  - Exterior walls shall be of ignition resistant building materials, such as stucco, fiber cement, wall siding, fire retardant treated wood, or other approved materials.
  - Exterior wall materials shall be extended from the foundation to the roof.
- **Exterior Windows, Skylights, and Doors (Section 708A)**
  - Dual-paned windows with one pane of tempered glass shall be installed to reduce the chance of breakage in a fire.
  - Operable skylights shall be installed with a non-combustible mesh screen (dimensions of the openings will not exceed 1/8 inch)
  - Weather stripping shall be provided around and under the garage door to prevent embers from blowing in.
  - All combustible and flammable liquids in the garage shall be stored away from ignition sources.
  - Exterior door surface shall be noncombustible or of ignition resistant material
- **Decking (Section 709A)**
  - All surfaces within 10 feet of the building shall be built with ignition- resistant, non-combustible, or other approved materials.
  - Spaces below the decking shall be minimized to reduce the likelihood of combustible collecting underneath the deck.
- **Accessory structures (Section 710A)**
  - Surfaces for accessory structures shall be made from noncombustible "hardscape" materials such as stone, tile, concrete, or decomposed granite.
  - Exterior furniture shall be made from metal like iron or cast aluminum instead of wood, teak, wicker, or other combustible materials.
  - Ignition resistant or non-combustible materials shall be used where fences are constructed on the property, particularly when attached to the building and/or within the 0-5' zone of the building.
- **Address Numbers**
  - The address shall be 4" minimum on contrasting background and clearly visible from the road.
  - White, stainless steel, or reflective numbers shall be used.

MM HAZ-3: **Defensible Space:** Section 701A.5 of the 2019 California Building Code (CBC) and Chapter 49 of the 2019 California Fire Code (CFC) requires compliance with relevant local and state vegetation requirements for defensible space and fuel management (e.g., California Fire Code Section 4906, California Public Resources Code 4291, California Government Code 51182) to mitigate the threat of wildfire to life-safety and property protection. An AMMR (Alternate Material and Method Request) and Fire Protection Plan (FPP) were submitted, reviewed and approved. The AMMR will remain part of the Project and the FPP will stay with the Project whenever it was sold. As approved, the Project will have a defensible space from 50 feet to less than 100 feet at portions of the southern border.

MM HAZ-4: **Block Wall:** A 6ft tall non-combustible wall will be provided along the portions of the southern boundary, constructed into two extensions, where 100 feet of defensible space cannot be satisfied. See Figure 2: Project Site Plan for detailed locations.

MM HAZ-5: **Fuel Modification Plan:** Prior to planting, the Fuel Modification Plan (FMP) and Landscape plan shall be submitted to the Project's case Planner for review and approval.

- **Fuel Modification Strategy:** In accordance with California Government Code Section 51182 along with the landscaping guidelines from Information Bulletin #08-05 and AB 3074, the following fuel modification guidelines by zone as presented in the Fire Protection Plan (FPP), Figure 18: Schematic for defensible space at 900 Marlborough, shall be provided around the buildings as follows:
  - **Zone 1A ("Ember Resistant Zone"):** A minimum of 5-foot landscape that is ember-resistant from the face of the building outward on all sides shall be maintained. In this area there shall be no possible fuels (i.e. firewood, vegetation, landscape mulch or wood chips). Clear soil, rocks, gravel or concrete shall be used.
  - **Zone 1B ("Green Zone"):** From 5 to 30 feet from the buildings, vegetation in this zone shall be low growing, well irrigated, fire-resistant, drought-resistant and consist of approved plant list.
  - **Zone 2:** From 30 to 100 feet from the buildings, vegetation in this zone shall be low growing, well irrigated and less flammable.

- **Irrigation:** The vegetation along the interface zone between the hillside and the buildings will be irrigated using high efficiency overhead rotors. This continuous irrigation will provide a healthy moisture content in the vegetation, reducing any dry or dead vegetation during the wildfire season. The overhead rotors will be controlled by a smart irrigation controller that uses real time weather data to adjust run times depending on local conditions, ensuring efficient use of water. Available manual overrides of the irrigation will allow additional water to be added to the vegetation should a fire encroach on the property.
- **Required Maintenance**: To properly mitigate wildfire propensity and spread, the fuel modification zones shall be maintained year-round by the individual property owner within their property boundary (lot lines). Vegetation management shall be completed annually by May 1 of each year and more often as needed for fire safety, as determined by the Riverside Fire Department. The Project Owner shall be responsible for all vegetation management on the site, in compliance with the FPP. The "Approved Maintenance Entity" shall be responsible for and shall have the authority to ensure long term funding, ongoing compliance with all provisions of the FPP, including vegetation planting, fuel modification, vegetation management, and maintenance requirements on all private lots, under their control (if not considered biological open space). The Approved Maintenance Entity shall obtain an inspection and report from City Inspector, in May of each year, certifying that vegetation management activities throughout the Project Site have been performed pursuant to the FPP and RFD standards.
- **Vegetation Zone Management Guidelines**
  - **Zone 1A/ B**
    - All dead vegetation (Grass, plants, trees, leaves/needles, etc.) shall be removed.
    - Trees shall be trimmed to a minimum or 10 feet from other trees.
    - Branches hanging over roofs and dead branches within 10 feet of chimneys or exhaust outlets shall be cleared.
    - Gutters and roofs shall be regularly cleared of all plant material.
    - Flammable plants or shrubs near windows shall be removed or pruned.
    - Vegetation and items that could catch fire under decks shall be removed.
    - Plants and trees shall be separated from items that could catch fire, such as patio furniture.
    - Wood piles shall be moved to Zone 2.
  - **Zone 2**
    - Annual grass shall be cut or mowed to a maximum of 4 inches.
    - Horizontal and vertical clearance shall be maintained between grass, shrubs, and trees.
    - Fallen plant material (leaves, cones, bark, twigs, branches, etc.) shall be removed.

MM HAZ-6: Fire Protection Systems

- **Automatic Sprinkler System:** As stated in the Section 16.08.145 of Title 16 City of Riverside Building and Construction Code: *"An automatic sprinkler system shall be installed and maintained in operable condition in all new buildings. All systems shall conform to the National Fire Protection Association Standards 13 and 13D and the Riverside Fire Department Standards and Policies."* An automatic sprinkler system, per NFPA 13 shall be provided throughout the two buildings. The system shall be installed as an early suppression, fast response ceiling (ESFR) sprinkler system. The sprinkler provisions for the main building structures shall help not only reduce any structure fires due to typical interior ignitions sources (e.g. electrical), but shall also help reduce other ignitions sources that may be introduced due to wildfire threats (e.g. embers entering the interior via breaches in the building envelope).
- **Water Supplies:** Two additional hydrants shall be provided to satisfy hydrant space per the CFC as amended by Riverside. The two additional hydrants are to help offset the reduced defensible space along the southern border of the building facades, and may be installed anywhere along the south side of Buildings A and B within the parking lots. This additional access to water supplies shall enhance the fire-fighting response to a wildfire along the south side where the threat is most prevalent.
  - A 3-foot (914 mm) clear space shall be maintained around the circumference of fire hydrants.
  - Private fire hydrants shall be periodically inspected, tested and maintained in accordance with California Code of Regulations, Title 19, Division 1, Chapter 5.
  - The required flow rate of each private hydrant shall be determined based on the Riverside Fire Department's applicable standards and policies during the next design stage.

MM HAZ-7:	**Fire Department Access:** Site access, including fire lane, driveway, and entrance road widths, primary and secondary access, gates, turnarounds, dead end lengths, signage, aerial fire apparatus access, surface, and other requirements shall comply with the requirements of the 2019 California Fire Code and City of Riverside Standards. Hydrant locations shall be identified by the installation of approved blue reflective markers, as required by the City's fire code official.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
10. HYDROLOGY AND WATER QUALITY				
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

10a. Response: ***(Source: General Plan 2025 Public Facilities and Infrastructure Element; Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)***

Less Than Significant Impact. The Project Applicant will be required to prepare a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) regulations. The SWPPP will be included and implemented as part of the NPDES General Industrial Activities Storm Water Permit obtained by the Project Applicant. The SWPPP will contain construction and operational best management practices (BMPs) that will restrict the discharge of sediment into the streets and local storm drains, based on the *Project Specific Water Quality Management Plan* prepared for the Project. The SWPPP must be obtained prior to the commencement of construction in order to ensure applicable BMPs are implemented. A SWPPP remains on a project site during construction and during project operations, so that private development entities are informed as to the measures required to be implanted and RWQCB field staff can monitor compliance with the required measures. Adherence to the BMPs outlined in the mandatory SWPPP will ensure that the Project's construction and operations do not violate any water quality standards or waste discharge requirements. A **less than significant impact** regarding water quality standards and waste discharge will occur directly, indirectly, and cumulatively. No mitigation is required.

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

10b. Response: ***(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply, Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, RPU Urban Water Management Plan; Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)***

Less Than Significant Impact. The grading and trenching that would be undertaken to accommodate building footings, retaining wall footings, utility lines, and other underground infrastructure would not extend to depths reaching groundwater estimated to be 150 feet below ground surface. Therefore, no direct construction related impacts to groundwater supplies, or groundwater recharge activities would occur. The proposed Project would be connected to City water supplies and would not result in a direct decrease in underlying groundwater supplies from increase in water demand attributable to the Project. Upon construction of the Project, most of the approximately six-acre site will be covered with impermeable surfaces, decreasing the ability of stormwater to naturally percolation through the ground into underlying groundwater. However, the Project includes two detention basins, one each along the north perimeter of the two buildings. The basins serve two purposes. First, the basins would provide a hydrologic benefit by reducing the speed of and retaining stormwater flows so that flows from the site are maintained at or below existing levels. Second, the basins would provide a groundwater benefit by allowing captured stormwater to percolate through the ground within the basins and into underlying groundwater. Groundwater impacts would be **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required**.**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on-or-off-site?	☐	☐	☒	☐

10ci. Response: ***(Source: Google Earth; Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)***

Less Than Significant Impact. As discussed in response 10a above, the Project will comply with Federal NPDES regulations as implemented through a SWPPP. The SWPPP will contain construction and operational BMPs that will restrict the discharge of sediment into the streets and local storm drains. Adherence to the BMPs outlined in the mandatory SWPPP will ensure that the Project's construction and operations does not violate any water quality standards or waste discharge requirements. Storm water runoff will be discharged off-site into local storm drains after being retained by a storm water basin system. Construction of the Project would be restricted to the Project site and the Project would not alter the course of any stream or river that would lead to on-or off-site siltation or erosion. The Project will have a **less than significant impact** directly, indirectly, or cumulatively to existing drainage patterns and no mitigation is required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site?	☐	☐	☒	☐

10cii. Response: (*Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)*

Less Than Significant Impact. The Project will include two buildings, paved parking, walkways, landscaped areas, and designed drainage basin. Following construction, runoff from the proposed buildings and impervious surfaces will be conveyed to a new storm drain system including two drainage basins. As discussed in response 10b, the basins would provide a hydrologic benefit by reducing the speed of and retaining stormwater flows so that flows from the site are maintained at or below existing levels, thereby reducing erosion potential. Project implementation will not adversely affect the existing drainage patterns in the area and will match pre-developed flows. The Project will not increase the rate or amount of surface runoff in a manner which would result in flooding on-or-off-site. The Project will have a **less than significant impact** directly, indirectly, or cumulatively regarding surface runoff and no mitigation is required.

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?	☐	☐	☒	☐

10ciii. Response: (*Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)*

Less Than Significant Impact. As discussed in responses 10b and 10cii, following construction, runoff from the proposed buildings will be conveyed to a new storm drain system including two drainage basins. The basins would provide a hydrologic benefit by reducing the speed of and retaining stormwater flows so that flows from the site are maintained at or below existing levels, thereby not affecting the capacity of the City storm drains in Marlborough Avenue. Because Project implementation will result in the same rate and amount of surface runoff as in the existing condition the Project will not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems. In addition, with implementation of the SWPPP as discussed in response 10a, the Project would not create substantial amounts of additional sources of polluted runoff. The Project will have a **less than significant impact** directly, indirectly, or cumulatively regarding surface runoff and no mitigation is required.

iv. Impede or redirect flood flows?	☐	☐	☐	☒

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

10civ. Response: ***(Source: General Plan Public Safety Element Figure PS-4 Flood Hazard Areas; Federal Emergency Management Agency (FEMA). https://msc.fema.gov/portal/search?AddressQuery=riverside#searchresultsanchor, FEMA. Flood Zones, Definition/Description. http://www.fema.gov/floodplain-management/flood-zones; Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)***

No Impact. The Project site is located on the base of a hillside with little to no probability of natural flooding events or flood flows. According to the Federal Emergency Management Agency (FEMA) flood insurance maps obtained for the City of Riverside, the proposed Project site is located in Zone X. This flood zone has an annual probability of flooding of less than 0.2 percent and represents areas outside the 500-year flood plain. Properties located in Zone X are not located within a 100-year flood plain. Also, according to Figure PS-4 of the Safety Element, the Project is outside the nearest flood hazard area defined as areas with a 1 percent annual chance of flooding, located approximately 0.75 miles in the form of Springbrook Arroyo flowing east to west which is a minor tributary to the Santa Ana River. Therefore**, no impact** potential for redirecting flood waters exists either directly, indirectly, or cumulatively and no mitigation is required.

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

10d. Response: ***(Source: GP 2025 EIR Chapter 7.5.8 – Hydrology and Water Quality, General Plan Public Safety Element Figure PS-4 Flood Hazard Areas)***

No Impact. As discussed in response 10civ, the proposed Project site is not located in an area that is subject to flooding. The Project site is not exposed to inundation by tsunami or seiche. The Project site is located inland approximately 45 miles from the Pacific Ocean and the Project site would not be exposed to the effects of a tsunami. Furthermore, a seiche in the nearest large waterway or body of water (Lake Perris to the southeast) is not likely to occur due to the approximate 12-mile distance between the site and the lake.

As illustrated in Figure PS-4 of the Safety Element, the Project site is located outside of the nearest inundation areas for the small bodies of water in the City including Sycamore Canyon Dam; the Box Springs Dam; or the Fairmount Dam. As a result, no impact with regards to flooding, tsunamis, seiches, or dam inundation will occur. Therefore, **no impact** potential for seiche or mudflow exists either directly, indirectly, or cumulatively and no mitigation is required.

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

10e. Response: (*Appendix H: Project Specific Water Quality Management Plan; Appendix I: Marlborough Northgate Business Center Preliminary Hydrology Report)*

Less Than Significant Impact. Chapter 14.12 of the City of Riverside Municipal Code is responsible for implementing the NPDES and MS4 storm water runoff requirements. As discussed in response 10a above, the Project will comply with Federal NPDES regulations as implemented through a SWPPP. The Applicant will also be required to install the post-construction structural BMPs identified in the SWPPP. In addition, the Project's construction and operations would not interfere with any groundwater management or recharge plan. As a result, **a less than significant impact** directly, indirectly, or cumulatively is anticipated and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

11. LAND USE AND PLANNING

Would the project:

a. Physically divide an established community?	☐	☐	☐	☒

11a. Response: ***(Source: General Plan 2025 Land Use and Urban Design Element, Project site plan, City of Riverside GIS/CADME map layers)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

No Impact. The proposed Project would develop a three-parcel site with an industrial development consisting of two warehouse buildings totaling 99,950 square-feet. Building A consists of 39,000 square-feet (sf) and Building B consists of 60,950 sf. Building A includes 5,000 sf of ancillary office/manufacturing space, four truck loading docks, and 50 passenger vehicle parking spaces. Building B includes 11,500 sf of ancillary office/manufacturing space, six truck loading docks, and 85 passenger vehicle parking spaces.

The City's General Plan designates the proposed Project site and surrounding developments to the north, south/southwest, east, and west as Business/Office Park (B/OP). The Project site and surrounding area is zone BMP-SP-Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones. As shown in the General Plan on Figure LU-4 Built Environment/ Activity Centers, the Project site and surrounding areas to the north, east and west are identified as "Major Business Parks" within the Specific Plan (Hunter Business Park) Overlay Zones. The Project site is therefore within an established business area and would not divide an established community. Beyond the proposed Project limits to the southeast, Figure LU-2 Urban Design Framework designates the area as "Major Open Space and Parks" which is the Box Springs Mountain Reserve (Reserve) that is undeveloped and will remain undeveloped. The Project site is therefore at the edge adjacent to the Reserve open space area. Consequently, the Project would be consistent with the business parks categorization of the surrounding area at the edge of major open space and therefore will not physically divide an established community resulting in **no impact** directly, indirectly or cumulatively. No mitigation is required.

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?	☐	☐	☐	☒

11b. Response: ***(Source: General Plan 2025 Figure LU-10 – Land Use Policy Map, Zoning Map of the City of Riverside)***

No Impact. The City's General Plan (GP) designates the proposed Project site and surrounding areas to the north, east and west as Business/Office Park (B/OP). The Project site and surrounding area is zoned BMP-SP Business and Manufacturing Park and Specific Plan (Hunter Business Park) Overlay Zones. The Reserve has a GP land use designation of Public Park (P) to the southeast within unincorporated Riverside County. Southwest of the Project site is property with a GP land use designation of Hillside Residential (HR), however this area to the southwest is zoned Public Facilities (PF) per the City's Zoning Code. This PF zoning designation is a more accurate reflection of the existing development which includes an existing paved utility road leading to a water storage tank. Future development of the area to the southwest is unlikely given the topographical constraints and water storage function. In addition, as discussed in Section 3 Biological Resources, the Project was determined to be consistent with the MSHCP with implementation of lighting mitigation to reduce nighttime lighting to species within the Reserve, which is defined as a Conservation Area by the MSHCP. Consequently, the Project would have **no impact** directly, indirectly, or cumulatively on applicable land use plans, policies, or regulations, and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

12. MINERAL RESOURCES

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?	☐	☐	☐	☒

12a. Response: ***(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)***

No Impact. As illustrated in Figure OS-1 of the City's Open Space and Conservation Element, the Project site is located within an MRZ-3 mineral resource zone indicating that the area contains known or inferred mineral occurrences of undetermined mineral resource significance. Scattered areas harbor marginally economic deposits of feldspar, silica, limestone and other rock products. Currently, the Project site is surrounded by the similar developments to the north, east, and west, and to the south is undeveloped land associated with a City water storage tank and the Box Springs Mountain Reserve. Due to the prior designation of the Project site for business park or industrial use as depicted in the General Plan and Zoning Map, the

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
decision to develop the site and therefore remove it from being mined for minerals was decided upon approval of the General Plan in 2007 as well as its previous versions. . The Project will have **no impact** on mineral resources directly, indirectly, or cumulatively on regionally significant mineral resources and no mitigation is required.				
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?	☐	☐	☐	☒

12b. Response: ***(Source: General Plan 2025 Figure – OS-1 – Mineral Resources)***

No Impact. As stated in response 12a, there is no potential for the site to be a source of mineral extraction given the City's decision to designate the site for business park/industrial development. The Project will have **no impact** directly, indirectly, or cumulatively on locally significant mineral resources and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE				
Would the project:				
a. Result in 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?	☐	☐	☒	☐

13a. Response: (*Appendix J: Marlborough Northgate Business Center Noise Impact Analysis, Urban Crossroads, April 2022)*

Less Than Significant Impact. Noise impacts can occur from short-term construction activities and long-term operations of a project. For light industrial uses such as the proposed Project, operational noise consists of parking lot vehicle noise, loading dock activity, roof-top air conditioning noise, and trash enclosure activity. Short-term construction noise can occur from crew commutes and transport of equipment and materials to the Project site. Additional short-term construction noise comes from site preparation, grading, building construction, architectural coating, and paving. Typically, the most impactful noise impacts derive from the use of large construction equipment or loud operational activity near sensitive receptors. For the proposed Project, the nearest sensitive receptor is the Box Spring Mountain Reserve (Reserve) at the southeast corner of the Project site, defined as a Conservation Area by the Multiple Species Habitat Conservation Plan (MSHCP). Other sensitive land uses in the form of homes to the south are located at greater distances from the Project and will experience lower noise levels due to the additional attenuation from distance and the shielding of intervening structures including the hillside to the south of the Project site. Noise impacts were assessed for eight receiver locations surrounding the Project as shown below in Figure 3: Noise Receiver Locations. The receiver locations include four in the distant residential neighborhood to the south, three in the industrial area immediately surrounding the Project, and the Reserve property to the southeast.

Potential noise impacts from these sources were analyzed in the *Marlborough Northgate Business Center Noise Analysis,* prepared by Urban Crossroads, dated July 2022. Although the study is focused on the Reserve sensitive receptor to the south, the analysis also addresses the surrounding light industrial land uses.

The City of Riverside exempts noise associated with construction, repair, remodeling, or grading of any real property, provided a permit has been obtained from the City and activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday (Section 7.35.020.G of Title 7 – Noise Control). Nonetheless, construction noise was evaluated at office/industrial land uses using the Federal Transit Administration recommended standards of 85 dBA L_{eq} /90 dBA $L_{eq,}$ respectively. Based on communication

with the Western Riverside County Regional Conservation Authority (RCA), construction noise was evaluated at the Reserve property using a standard of 65 dBA L_{eq}.[3]

Although the Project's construction noise would be higher than ambient noise levels, the Project's construction activities would be typical in nature and are required to comply with the allowed construction hours per the City's Municipal Code Noise Ordinance. Therefore, noise levels from Project construction noise are within applicable standards, resulting in a less than significant impact directly, indirectly, or cumulatively and no mitigation is required.

Operational noise impacts from the proposed Project are regulated by the City Noise Code (Title 7 of the City of Riverside Municipal Code) and the MSHCP. The Noise Code presents exterior and interior sound level standards to evaluate the compatibility of proposed land uses relative to existing and future exterior noise levels. The applicable noise standards for the proposed Project are those related to industrial and residential land uses. Industrial land uses surround the Project site and dominate the land use pattern in the vicinity. Although no residential land uses exist in the surrounding area, Section 6.1.4 of the MSHCP states "For planning purposes, wildlife within the MSHCP Conservation Area should not be subject to noise that would exceed residential noise standards." Consequently, the residential noise standards apply in relation to the Reserve. Since the proposed Project development will include noise generating activities, the operational noise levels were calculated at receiver locations within adjacent areas surrounding the Project site as wells as the Reserve. In accordance with the Noise Code, an exterior noise level standard of 65 dBA L_{50} for office/commercial land uses and 70 dBA L_{50} for industrial land uses. A standard of 55 dBA Leq/45 dBA Leq for day/night time, respectively, was used for analysis of impacts to residential areas the Reserve.

Although the Noise Code does not provide construction noise standards, the City of Riverside does exempt noise associated with construction, repair, remodeling, or grading of any real property, provided a permit has been obtained from the City and activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday (Section 7.35.020.G of Title 7 – Noise Control). Nonetheless, construction noise was evaluated at office/industrial land uses using the Federal Transit Administration recommended standards of 85 dBA L_{eq} /90 dBA $L_{eq,}$ respectively. Based on communication with the Western Riverside County Regional Conservation Authority (RCA), construction noise was evaluated at the Reserve property using a standard of 65 dBA L_{eq}.[4]

The proposed Project's construction noise would range from 25.2 A-weighted decibels one-hour equivalent noise level (dBA Leq) to 78.6 dBA Leq as shown in Table 13.a-1 at eight receiver locations. As shown in the table, construction noise associated with the proposed Project does not exceed the residential standard at receiver locations R1 through R4, the industrial standard at receiver locations R5 through R7, and the residential standard at receiver R8 (the Reserve). Therefore, noise levels from Project construction noise are within applicable standards, resulting in a less than significant impact directly, indirectly, or cumulatively and no mitigation is required.

Table 13.a-1: Construction Noise Level Compliance

Receiver Location[1]	Construction Noise Levels (dBA L_{eq})			
	Highest Construction Noise Levels[2]	Phase of Construction	Threshold[3]	Threshold Exceeded?[4]
R1	59.5	Site Preparation / Grading	80	No
R2	27.9	Site Preparation / Grading	80	No
R3	25.2	Site Preparation / Grading	80	No
R4	33.5	Site Preparation / Grading	80	No
R5	69.7	Site Preparation / Grading	90	No
R6	78.6	Site Preparation / Grading	90	No

[4] Personal telephone communication and confirmation email between Ray Hussey, President of Enplanners, Inc. and Elizabeth Dionne, Sr. Management Analyst- Management/Monitoring, Western Riverside County Regional Conservation Authority. March 22, 2022.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

R7	78.5		90	No
R8	62.9		65	No

Source: Appendix J: Marlborough Northgate Business Center Noise Impact Analysis, Urban Crossroads, April 2022

Operational noise levels associated with proposed Project will satisfy the daytime and nighttime exterior noise level standards at receiver locations R1 through R8. The proposed Project's operational noise would range from 25.2 A-weighted decibels one-hour equivalent noise level (dBA Leq) to 78.6 dBA Leq as shown in Table 13.a-2 at eight receiver locations. As shown in the table, operational noise associated with the proposed Project does not exceed the residential standard at receiver locations R1 through R4 and R8 (the Reserve), and the industrial standard at receiver locations R5 through R 7. Therefore, noise levels from Project operational noise are within applicable standards, resulting in a less than significant impact directly, indirectly, or cumulatively and no mitigation is required.

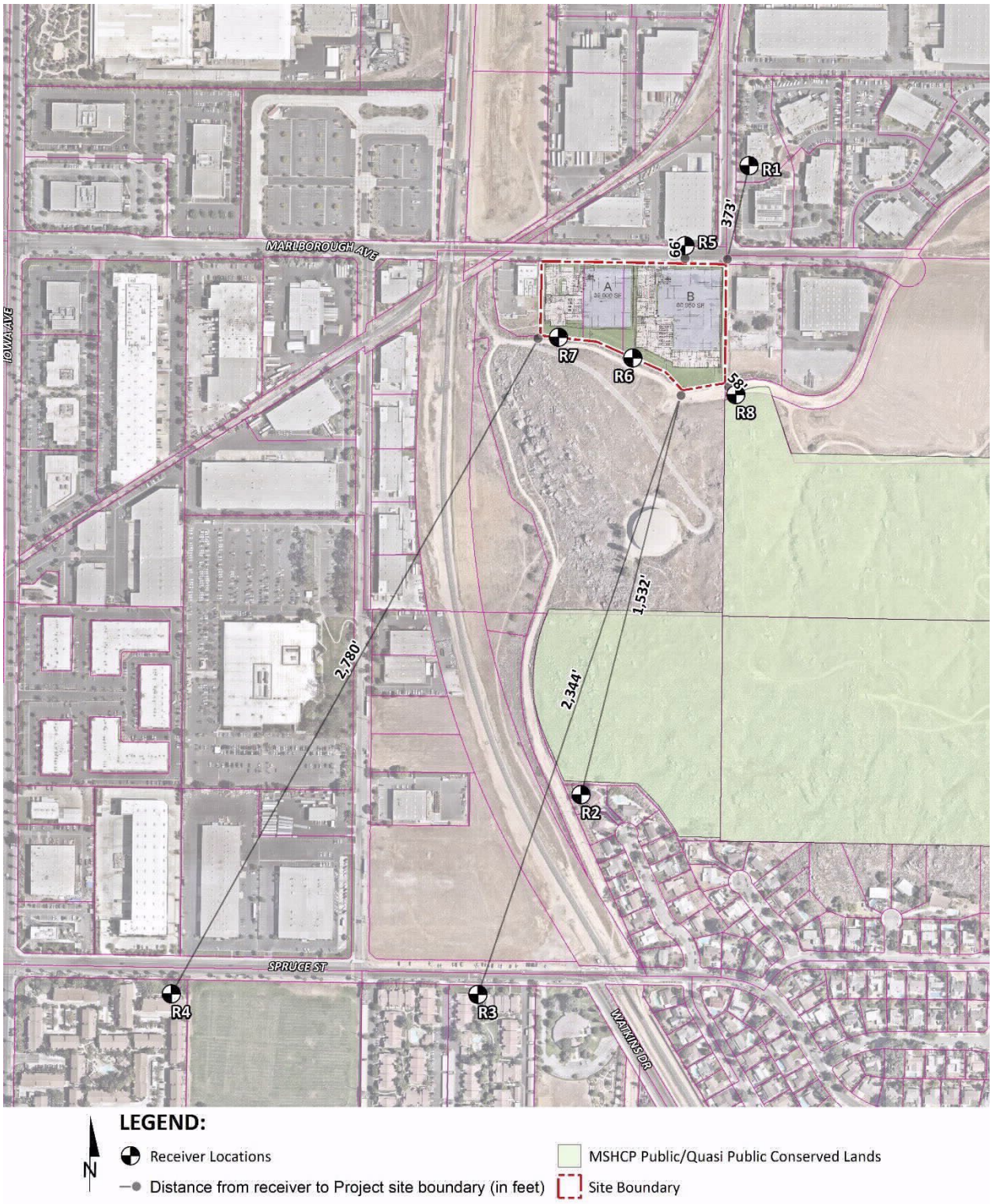
Table 13.a-2: Operational Exterior Noise Level Compliance

Receiver Location[1]	Project Operational Noise Levels (dBA L_{eq})[2]		Noise Level Standards Exceeded?[8]	
	Daytime	Nighttime	Daytime	Nighttime
R1	35.6	35.0	No	No
R2	15.2	15.0	No	No
R3	12.2	12.2	No	No
R4	17.4	17.2	No	No
R5	45.2	44.5	No	No
R6	55.0	55.0	No	No
R7	58.9	58.9	No	No
R8	44.2	44.2	No	No

Source: Appendix J: Marlborough Northgate Business Center Noise Impact Analysis, Urban Crossroads, July 2022

The construction and operational noise levels associated with the proposed Project will satisfy the noise level standards at all nearby receiver locations, resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

Figure 3: Noise Receiver Locations



b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

13b. Response: (*Source: California Department of Transportation Environmental Program. Technical Noise Supplement - A Technical Supplement to the Traffic Noise Analysis Protocol. Sacramento, CA : s.n., September 2013; The Marlborough Northgate Business Center, Focused MSHCP Noise Assessment, City of Riverside, prepared by Urban Crossroads, dated November 2021.)*

Less Than Significant Impact. The potential for ground-borne vibration impacts occurs during construction activities. Once construction activities cease, no further ground-borne vibration impacts of significance would occur for light industrial uses such as the proposed Project. Ground-borne noise and vibration from construction activity has the potential to be high when activities occur near Project boundaries, however most construction activities are more central to the Project site. Construction activity can result in varying degrees of ground vibration, depending on the equipment and methods employed. Operation of construction equipment causes ground vibrations that spread through the ground and diminish in strength with distance. Ground vibration levels associated with various types of construction equipment are used to estimate the potential for building damage using vibration assessment methods defined by the FTA.[5]

Based on maximum acceptable continuous vibration threshold of 0.3 PPV (in/sec) for older residential buildings and 0.5 PPV (in/sec) for modern industrial/commercial buildings, the Project construction vibration levels will satisfy the building damage thresholds at all surrounding receiver locations including the closest commercial/industrial structure to the west approximately 15 feet. The proposed Project construction of the 99,950 square feet of light industrial uses comprised in two buildings would result in less than significant generation of groundborne vibration and groundborne noise. This includes the most impactful use of earthwork equipment for cutbacks into the hillside and footings for CMU walls, footings and building pad, and material export. Upon completion, the proposed Project will produce an acceptable vehicular traffic, trash enclosure activity, and loading dock activity and correspondingly a less than significant operational generated groundborne vibration and groundborne noise. Groundborne vibration and groundborne noise levels during Project construction and operations would result in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.

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?	☐	☐	☐	☒

13c. Response: ***(Source: General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours, Figure N-9 – March ARB Noise Contour)***

No Impact. As stated in response 9e, Flabob Airport is located approximately 6.2 miles to the west and March ARB (March /Air Reserve Base) located approximately 7.5 miles to the southeast of the Project site. The Project site is not located within any 60 Community Noise Equivalent Level (CNEL) contour line boundaries of Flabob Airport. As defined by the March Air Reserve Base/Inland Port Airport Land Use Compatibility Plan, the Project site is located in Zone E characterized by low impact from aircraft noise. Therefore, the Project site is not located in a high noise area of Flabob Airport, MIP Airport, or any other airport. The proposed Project would not expose employees to excessive aircraft noise and **no impact** would occur directly, indirectly, or cumulatively. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
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)?	☐	☐	☐	☒

14a. Response:

[5] Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

No Impact. The proposed Project is anticipated to result in the generation of minimal new jobs. Therefore, the Project will not induce direct, unplanned, and substantial growth in the form of new employees. In addition, the Project will not induce indirect, unplanned, and substantial growth by removing an impediment to growth such as an extension of a roadway or utilities. The Project would result in **no impact** directly, indirectly, or cumulatively from direct and indirect growth inducement and no mitigation is required.

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

14b. Response:

No Impact. The Project is proposed on an undeveloped site that has no existing housing. The Project will not displace existing people or housing, necessitating the construction of replacement housing elsewhere. Therefore, there will be **no impact** on existing housing either directly, indirectly, or cumulatively and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES				
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?	☐	☐	☒	☐

15a. Response: ***(Source: General Plan 2025 FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)***

Less than Significant Impact. The Fire Department currently reviews all new development plans, and future development is required to conform to all fire protection and prevention requirements, including, but not limited to emergency access, and fire flow (or the flow rate of water that is available for extinguishing fires. As discussed in response 10d, a Fire Protection Plan was prepared for the Project that prescribes a wide ranges of project-specific fire suppression recommendations primarily to protect the Project from wildfire, but also to protect the Project from onsite urban fires. The proposed Project would result in a minimal, incremental, increase in the demand for fire services. The Project's implementation will not affect response times or department capacity. Therefore, the Project will not increase demand on fire services resulting in the renovation of an existing fire station or construction of a new fire station that would result in an impact to the environment. There would be **less than significant impacts** directly, indirectly, or cumulatively and no mitigation is required.

b. Police protection?	☐	☐	☒	☐

15b. Response: ***(Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)***

Less Than Significant. The Police Department will review the site plan for the proposed Project to ensure that the development adheres to the Department requirements regarding access, lighting and other public safety site design features. The proposed Project would result in a minimal, incremental, increase in the demand for police services. Therefore, the Project will not increase demand on police services resulting in the renovation of an existing police station or construction of a new police station that would result in an impact to the environment. There would be a **less than significant** directly, indirectly, or cumulatively and no mitigation is required.

c. Schools?	☐	☐	☐	☒

15c. Response: ***(Source: General Plan 2025 FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. The Project is non-residential and will not directly generate school aged children. The proposed Project will produce minimal new jobs that could otherwise generate school aged children. The Project is required to pay school impact fees, and contribute its fair share to Riverside Unified School District for the cost to build new school facilities proposed in the future by the District. Therefore, the Project will not increase demand on schools resulting in the renovation of an existing school or construction of a new school that would result in an impact to the environment. There would be **no impact** directly, indirectly, or cumulatively and no mitigation is required.				
d. Parks?	☐	☐	☐	☒
15d. Response: ***(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)***				
No Impact. The Project is non-residential and will not directly generate residents and increase demand for parks or recreational facilities. The proposed Project will produce minimal, new jobs that could otherwise generate new employees and an associated increase in demand for parks. The Project is required to pay park impact fees, and contribute its fair share to the City for the cost to build new parks or recreational facilities proposed in the future by the City. Because the Project is expected to generate a minimal increase in new employment, the Project will not increase demand on parks resulting in the renovation of an existing park or construction of a new park that would result in an impact to the environment. There would be **no impact** directly, indirectly, or cumulatively and no mitigation is required.				
e. Other public facilities?	☐	☐	☐	☒
15e. Response: ***(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)***				
No Impact. The Project is in an urbanized area and does not propose new residences. Adequate public transit service from RTA bus lines and the Metrolink Station are nearby and available to serve the Project. The Project would have a minimal effect on the demand for other public services such as libraries, community centers, and healthcare facilities. Therefore, Project will not result in the renovation or construction of other public facilities that would result in an impact to the environment. There would be **no impact** directly, indirectly, or cumulatively from the renovation or construction of other public facilities and no mitigation is required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION				
Would the project:				
a. 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?	☐	☐	☐	☒
16a Response: ***(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, Bicycle Master Plan May 2007)***				
No Impact. As stated in response 15d, the Project will result in a minimal increase in demand for parks or recreational facilities, and will not result in the renovation of an existing park or construction of a new park that would result in an impact to the environment. There would be **no impact** directly, indirectly, or cumulatively and no mitigation is required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

16b Response: ***(Source: The project is industrial in nature)***

No Impact. The Project will not include new recreational facilities or require the construction of new or expansion of existing recreational facilities that would result in an impact to the environment. There would be **no impact** directly, indirectly, or cumulatively and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION				
Would the project:				
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐

17a Response: ***(Source: General Plan 2025 Circulation and Community Mobility Element; Appendix K - 900 Marlborough Avenue Light Industrial Development - VMT and Pedestrian Crosswalk Analyses;*** **California Air Pollution Control Officers Association (CAPCOA)** ***Quantifying Greenhouse Gas Mitigation Measures, August 2010)***

Less Than Significant Impact. The City's Traffic Study Guidelines require that development projects prepare a traffic study to determine if the project requires traffic improvements to maintain the City's level of service (LOS) standard in accordance with the Circulation and Community Mobility Element. The Project site has been planned for general industrial development as shown in the General Plan. The Circulation and Community Mobility Element describes the circulation system within the City and most of the policies pertain to the broader circulation system that the proposed Project would not impact. Within the Project site, the plans are consistent with the policies to accommodate all forms for circulation. For example, the Project includes connecting paths of travel to sidewalks from all parking areas, as well as adding a crosswalk connection across Marlborough Avenue to the Hunter Park Metrolink Station approximately 900 feet to the west at Rustin Avenue (see **MM TRN-1** in response 17b). As a result, implementation of the Project are consistent with the City's General Plan 2025.

Although traffic congestion or automobile delay is no longer considered to be a significant environmental effect under CEQA, the City's adopted vehicle LOS policies set standards for which local roadways and intersections are required to maintain outside of the scope of CEQA. In accordance with the Traffic Study Guidelines, projects expected to generate less than 100 trips during both the AM and PM peak hours based on the latest version of the ITE Trip Generation Manual are presumed to have a less than significant General Plan LOS impact on the surrounding street network and are screened out from requiring a detailed LOS analysis.

The proposed Project trip estimate is 521 average daily trips, with 71 trips during the AM peak hour and 64 trips during the PM peak hour as shown in Table 17.a-1, which is less than the 100 peak hour trip threshold. The proposed Project is considered to be consistent with the General Plan LOS policy, screened out from detailed LOS analysis, and not responsible for traffic improvements the construction of which could create an impact to the environment.

Table 17.a-1: Project Trip Generation (General Light Industrial)

Land Use	Units	Peak Hour						Daily
		AM Peak Hour			PM Peak hour			
		In	Out	Total	In	Out	total	
Vehicle Rates								
Passenger Cars								
Trip Generation Rates		0.6097	0.0803	0.6900	0.0769	0.5431	0.6200	4.1700
Trip Generation		61	8	69	8	54	62	471

ISSUES (AND SUPPORTING INFORMATION SOURCES):				Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Trucks							
Trip Generation Rates	0.0063	0.0037	0.0100	0.0050	0.0050	0.0100	0.2500
Trip Generation	1	0	1	0	1	1	25
Total Vehicle Rates							
Trip Generation Rates[1] 99.95TSF	0.6160	0.0840	0.7000	0.0819	0.5481	0.6300	4.9600
Trip Generation	62	8	70	8	55	63	496
Passenger Car Equivalent Rates Calculations							
Passenger Cars							
Trip Generation	61	8	69	8	54	62	471
PCE Factor[2]	1.0	1.0	1.0	1.0	1.0	1.0	1.0
PCEs	61	8	69	8	54	62	471
Trucks							
Trip Generation	1	0	1	0	1	1	25
PCE Factor[2]	2.0	2.0	2.0	2.0	2.0	2.	2.0
PCEs	2	0	2	0	2	2	50
Total PCE Trip Generation	**63**	**8**	**71**	**8**	**56**	**64**	**521**
Total Peak Hour Threshold			**100**			**100**	
Exceeds Threshold			**No**			**No**	

[1] Rates and truck percentages based on Land Use 110 - "General Light Industrial" from Institute of Transportation Engineers (ITE) *Trip Generation* (10th Ed.)
[2] Recommended PCE Factor per City of Riverside *Transportation Impact Analysis Preparation Guide for Vehicle Miles Traveled and Level of Service Assessment* (July 2020).

Therefore, traffic conflicts with a program, plan, ordinance, or policy addressing the circulation system will result in a **less than significant impact** directly, indirectly or cumulatively and no mitigation is required.

b. Would the project conflict or be inconsistent with *CEQA Guidelines* Section 15064.3, subdivision (b)?	☐	☒	☐	☐

17b Response: ***(Source: General Plan 2025 Circulation and Community Mobility Element; Appendix K - 900 Marlborough Avenue Light Industrial Development - VMT and Pedestrian Crosswalk Analyses)***

Less Than Significant with Mitigation Incorporated. CEQA Guidelines Section 15064.3 specifies that Vehicle Miles Traveled (VMT) is the most appropriate measure of transportation impacts. The City Traffic Study Guidelines address changes to CEQA to include VMT analysis methodology and thresholds. Based on the Guidelines, a project would result in a significant project generated VMT impact if the project generated VMT per employee exceeds 15% below the current jurisdictional baseline VMT per employee.

The VMT analysis prepared for the Project contains detailed steps that were taken to generate a realistic VMT for the Project. In summary, the VMT value for the Project required adjustment because the traffic modelling conducted to generate the VMT values preceded construction of the Hunter Business Park and the model did not reflect its eventual construction. The detailed calculations are shown in Table 17.b-1.

Table 17.b-1: Transit Reduction Calculations

	Formula	Calculation
Project VMT (miles, from RIVTAM)		14.59
Transit Mode Share for Project (M)	=-50*distance+38; x=approximately 750 feet for project (800/5280 used for calculations)	30.42
Transit	=M-1.3%	29.12
B	0.67	0.67
%VMT	=Transit*B {Not to exceed 30%}	19.51
Reduction due to Transit Proximity (miles)		2.85
Project VMT after Location Adjustment		11.74

The jurisdictional average 2012 daily home-based work VMT per worker for the City of Riverside is 13.24 miles, whereas that for the Project TAZ is 11.74. However, since the City's threshold is based on 15% below the City average, the threshold

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact

for the Project is 11.254 VMT/Employee. The project VMT is, therefore, 5.2% above the City's threshold. Based on the City's VMT guidelines, the Project VMT exceeds the threshold of significance resulting in a CEQA transportation impact.

The following mitigations combined will reduce VMT by 5.25% rendering impacts to less than significant. **Mitigation Measure MM TRN-1** would add a crosswalk across Marlborough Avenue at the intersection of Rustin Avenue and Marlborough Avenue to encourage transit use by Project employees and reduce VMT by 2%. **MM TRN-1** would be designed to provide a safer and better connection to the Metrolink Station for existing and future residents and employees to cross Marlborough Avenue. Further analysis in the VMT study confirms the pedestrian crossings within the crosswalk would not cause westbound Marlborough Avenue vehicular traffic to queue beyond the railroad tracks and create a safety hazard. **MM TRN-1** in combination with the proposed Project's on-site lighting and walkways and existing sidewalks and street lights on Marlborough Avenue would provide a safe pedestrian linkage to the nearby Metrolink Station. The proposed on-site lighting and walkways are a project design feature that would reduce VMT by 1%. **MM TRN-2** would incorporate preferential car share spaces, secure bike storage, and showers into the design of the project and reduce VMT by 2.25%.

Implementation of **MM TRN-1** and **MM TRN-2** would provide a combined total VMT reduction of 5.25% negating the 5.2% exceedance of the City's threshold. Therefore, the Project would provide a VMT surplus of 0.05%, resulting in a **less than significant impact with mitigations incorporated** directly, indirectly or cumulatively.

MM TRN-1: Provide Pedestrian Network Improvements - Install Crosswalk across Marlborough Avenue at Rustin Avenue: Prior to issuance of the first occupancy permit, the Project Applicant shall construct a crosswalk across Marlborough Avenue on the east side of Rustin Avenue. Prior to construction of the crosswalk, the Project Applicant shall submit and receive approval of the crosswalk signage and striping plan and curb ramp improvements.

MM TRN-2: Implement Site Improvements Supporting Alternative Transportation Program: Prior to building permit issuance ~~Design Review approval~~, the project site plan, floor plans, and lighting plan shall include the following:

- The site plan shall show 14 total designated car share spaces located near building entrances.
- The site plan shall include 26 total bike parking spaces, in excess of the City Code requirement of seven (7).
- The site and floor plan shall include 16 secure employee bike parking spaces and two (2) showers.
- The lighting plan shall include safe and well-lit access to transit.

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

17c Response: ***(Source: General Plan 2025 Circulation and Community Mobility Element; Appendix K - 900 Marlborough Avenue Light Industrial Development - VMT and Pedestrian Crosswalk Analyses)***

Less Than Significant Impact. The Project would implement **MM TRN-1**, resulting in a crosswalk across Marlborough Avenue at the intersection of Rustin Avenue and Marlborough Avenue to encourage transit use by Project employees. As discussed in response 17b, the new crosswalk would not cause westbound Marlborough Avenue vehicular traffic to stop and queue up beyond the railroad tracks and create a safety hazard. Also, there will be construction of paved access on Marlborough and internal parking lot and walkways constructed in accordance with City development standards approved to maintain safe circulation patterns. Therefore, the Project will have a **less than significant impact** on from traffic hazards directly, indirectly and cumulatively. No mitigation is required.

d. Result in inadequate emergency access?	☐	☐	☒	☐

17d. Response: ***(Source: Project Site)***

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
No Impact. Construction of the Project will not require the closure of a public road or lane. The Project would be developed in compliance with Title 18, Section 18.210.030 and the City's Fire Code Section 503 (California Fire Code 2019); therefore, there will be **no impact** directly, indirectly or cumulatively to emergency access. No mitigation is required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES				
Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, 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 **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 Resource Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?	☐	☐	☒	☐
18a and 18 b. Response: (*Source: AB52 Consultation)*				
Less Than Significant Impact. A Sacred Lands File Search was conducted by the Project Applicant for the cultural resource research as part of the Cultural Resources Report. The City is the lead agency and sent AB 52 notices on June 25, 2021 to the following: 1. Gabrieleno Band of Mission Indians – Kizh Nation; 2. Soboba Band of Luiseno Indians; 3. Cahuilla Band of Indians; 4. Pechanga Band of Luiseno Indians; 5. Rincon Band of Luiseno Indians; 6. San Manuel Band of Mission Indians; 7. Morongo Band of Mission Indians; 8. Agua Caliente Band of Cahuilla Indians; and 9. San Gabriel Band of Mission Indians. Of the 9 on the list Rincon and Pechanga requested consultation on July 9, 2021 (Rincon) and July 21, 2021 (Pechanga). Rincon has closed consultation on July 16, 2021, and Pechanga has closed consultation on July 29, 2022. . As a result, the Project's potential impacts to tribal cultural resources are considered to be **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SYSTEM SERVICES				
Would the project:				
a. 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, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
19a. Response: ***(Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply, Table PF-2 – RPU Projected Water Demand, General Plan 2025 FPEIR Table 5.16-G – General Plan Projected Water Demand for RPU Including Water Reliability for 2025, Table 5.16-K -Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Table 5.16-L -Estimated Future Wastewater Generation for the Planning Area***				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Served by WMWD, Figure 5.16-4 – Water Facilities, and Figure 5.16-6 – Sewer Infrastructure; Appendix H - Project Specific Water Quality Management Plan; Appendix I - Marlborough Northgate Business Center Preliminary Hydrology Report) **Less Than Significant Impact.** The Riverside Public Utilities Water Division provides water and sewer service in the vicinity of the Project site. Electricity and natural gas are provided by Southern California Edison and SoCal Gas, respectively. *Water* An existing water line runs along adjacent Marlborough Avenue. The proposed Project would connect into existing water line to provide potable water to the Project. Water distribution lines would be installed and loop through the Project site in order to provide water supply to each of the buildings. Water for each building would be separately metered as shown in Figure 2: Project Site Plan. The necessary on-site water distribution line installation is included as a design feature of the Project and would not result in any physical environmental effects beyond what is analyzed in this environmental document. Off-site improvements to water lines located in the surrounding streets would not be required as the piping is correctly sized to continue to provide adequate water delivery to the Project site. Implementation of the proposed Project would not require or result in the relocation or construction of new water infrastructure, resulting in a **less than significant** directly, indirectly, or cumulatively and no mitigation is required. *Wastewater* The proposed Project will require little to no water demand being generated that would in turn generate substantial amounts of wastewater. Therefore, the proposed Project will not result in the construction of new wastewater facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. **No impact** directly, indirectly, or cumulatively will occur and no mitigation is required. *Storm Water Drainage* On-site storm water drainage infrastructure would be developed as part of the Project design in conformance with the Final Hydrology and WQMP Reports prepared for the Project. The on-site storm water biofiltration system would connect to existing storm water infrastructure in the City's right-of-way. The stormwater for the Project site will be mitigated by using gutters and pipes to concentrate the flow and drop inlets to capture and move stormwater into the bioretention basins and underground storm chambers for the developed areas. As presented in the Hydrology study for the Project, off-site storm water drainage facilities would not need to be upgraded with implementation of the proposed Project as existing off-site infrastructure has enough capacity to accommodate development on the Project site. Implementation of the proposed Project would not require or result in the relocation or construction of new off-site storm water infrastructure resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required. *Electric Power / Natural Gas* The proposed Project would tie into existing electrical and natural gas infrastructure that exists along Marlborough Avenue adjacent to the site. Such connections may require trenching within the adjacent roads; however, construction to connect to existing electrical and natural gas infrastructure would be temporary. Implementation of the proposed Project would not require the relocation or construction of new electrical/natural gas infrastructure resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required. *Telecommunications* The proposed Project would tie into existing telecommunication lines that exist on poles within the Marlborough Avenue right of way. Such connections would result in little to no ground disturbances and therefore no impact on the environment. Implementation of the proposed Project would not require the relocation or construction of new telecommunication infrastructure resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.				
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19b Response: ***(Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Water Systems Consulting, Inc. 2020 Urban Water Management Plan for the Riverside Public Utilities Water Division. Report dated July 2021.)***				
Less Than Significant Impact. Water to the Project site is supplied by the City of Riverside Public Utilities (RPU) Department. As outlined in the City's 2020 Urban Water Management Plan (UWMP), the 2020 total water supply and demand was 81,197 acre-feet, all derived from groundwater except 141 acre-feet of recycled supplies. By 2025, the UWMP Projects a total demand of 90,712 acre-feet and total water supplies increasing to 111,223 acre-feet. The Project will require a negligible fraction of water supply. The UWMP identifies the availability of adequate water supplies for planned City development in normal, dry and multiple dry years. The Project will not result in development beyond that projected in the UWMP, and sufficient water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.				
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?	☐	☐	☐	☒
19c Response: ***(Source: General Plan 2025 FPEIR Figure 5.16-5 - Sewer Service Areas, Figure 5.16-6 -Sewer Infrastructure, Table 5.16-K - Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, and Table 5.16-L -Estimated Future Wastewater Generation for the Planning Area Served by WMWD)***				
Less Than Significant Impact. The proposed Project will generate minimal wastewater. The Project will not result in the generation of wastewater flows that would exceed the available and projected capacity of the City's wastewater treatment systems resulting in a **less than significant impact** directly, indirectly, or cumulatively and no mitigation is required.				
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?	☐	☐	☒	☐
19d. Response: ***(Source: General Plan 2025 FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area, Waste Management. El Sobrante Landfill. https://www.wm.com/location/california/inland-empire/riverside-county/el-sobrante.jsp, and CalRecycle. Facility/Site Summary Details: Bandlands Sanitary Landfill. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2245?siteID=2367)***				
Less Than Significant Impact. The Project is consistent with the General Plan 2025 Typical Build-Out scenario where future landfill capacity was determined to be adequate as shown in Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR. Therefore, a **less than significant impact** to landfill capacity will occur directly, indirectly or cumulatively				
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒
19e. Response: ***(Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)***				
No Impact. The proposed Project must comply with the City's waste disposal requirements as well as the California Green Building Code and as such would not conflict with any federal, State, or local regulations related to solid waste. Therefore, **no impact** related to solid waste statutes will occur directly, indirectly, or cumulatively and no mitigation is required.				

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE				
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?	☐	☐	☒	☐

20a. Response: ***(Source: Appendix G: Marlborough Northgate Business Center Fire Protection Plan; General Plan 2025 Figure PS-7 – Fire Hazard Areas, General Plan 2025 Public Safety Element, CalFire Very High Severity Zones in LRA Map, December 21, 2009).***

Less Than Significant Impact. The proposed Project is located in a Very High Fire Severity Zone (VHFSZ) and within a Local Responsibility Area for the City.

During both construction and operational activities, the proposed Project would be required to comply with applicable plans set forth by the City Fire Department, the City Office of Emergency Management (OEM), and other public safety agencies. Evacuation instructions and routes are provided by the OEM and are facilitated by the responding City departments and agencies such as the Riverside Police and Fire Departments, and the Riverside County Sheriff and Fire Departments. Evacuation instructions are to be followed by those on the Project site during construction and operation and are represented on the City's preparedness website Rivcoready, which includes impacted areas and routes. Additionally, as discussed in Section 17 Transportation, emergency vehicles would be provided easy access and travel within the site, along with vendors and employees. A **less than significant impact** related to emergency response plans or emergency evacuation plans would occur directly, indirectly, and cumulatively and no mitigation is required.

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?	☐	☒	☐	☐

20b. Response: ***(Source: Appendix G: Marlborough Northgate Business Center Fire Protection Plan; General Plan 2025 Figure PS-7 – Fire Hazard Areas, General Plan 2025 Public Safety Element, CalFire Very High Severity Zones in LRA, December 21, 2009).***

Less Than Significant Impact with Mitigation Incorporated. As discussed above in response 20a, the Project site is located in a VHFSZ and can be easily accessible in case of an emergency. Furthermore, as mentioned in Section 9 Hazards and Hazardous Materials, response 9d, implementation of mitigation measure **MM HAZ-1** through **MM HAZ-7** is meant to render the impact of wildfire to less than significant through proper building construction, fuel modification design, and vegetation management as required in the Project's FPP. Although the potential for a wildfire to occur is not controllable or easily avoided even with implementation of mitigation, implementation of **MM HAZ-1** through **MM HAZ-7** in combination with the City's ability to provide adequate staffing to fight a wildland fire would reduce the severity of a potential wildfire and therefore reduce the exposure of Project occupants to pollutant concentrations from a wildfire. Therefore, a **less than significant impact with mitigation incorporated** related to exposure of Project occupants to high concentrations of pollution during wildfire would occur directly, indirectly, and cumulatively and no mitigation is required.

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?	☐	☐	☐	☒

20c. Response: ***(Source: Appendix G: Marlborough Northgate Business Center Fire Protection Plan; General Plan 2025 Public Safety Element)***

No Impact. The proposed Project includes the construction of two warehouse buildings, parking, and landscaping of which the Project's FPP has been designed to render the risk of wildfire to less than significant. As a result, the Project will not require the installation or maintenance of fire prevention infrastructure that would exacerbate fire risk or that would result in temporary or ongoing impacts to the environment. In contrast, the Project would install new fire hydrants on the south walls of each building to facilitate suppression of a wildfire. As a result, **no impact** will occur directly, indirectly, and cumulatively and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☒	☐	☐

20d. Response: (Source: General Plan 2025 Public Safety Element)

Less Than Significant Impact with Mitigation Incorporated. The Project site is on relatively flat grade, with a slight slope of approximately 5% on the northern aspect of the property, increasing to approximately 30% immediately adjacent to the southern portion of the property. With implementation of mitigation measure **MM HAZ-**1 through **MM HAZ-7** referred to in response 9g, and construction of the on-site storm drain system, the Project will not expose people or structures to flooding or landslides facilitated by runoff flowing down barren and charred slopes. As a result, **a less than significant impact with mitigation incorporated** would occur directly, indirectly, and cumulatively and no mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE				
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?	☐	☒	☐	☐

21a. Response: ***(Source: General Plan 2025 – Figure OS-6 – Stephen's Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (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, Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Figure 5.5-1 - Archaeological Sensitivity, Figure 5.5-2 -Prehistoric Cultural Resources Sensitivity, Appendix D, Title 20 of the Riverside Municipal Code)***

Less Than Significant Impact with Mitigation Incorporated. Potential impacts related to habitat of fish or wildlife species were discussed in the Biological Resources Section of this Initial Study, and were all found to result in a **less than significant impact with mitigation** directly, indirectly, and cumulatively with implementation of **MM AES-1** and **MM BIO-1**. Additionally, potential impacts to cultural, archaeological, and paleontological resources related to major periods of California and the City's history or prehistory were discussed in the Cultural Resources Section of this Initial Study, resulting in a **less than significant impact** directly, indirectly, and cumulatively. No mitigation is required.

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)?	☐	☒	☐	☐

21b. Response: ***(Source: General Plan 2025 FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)***

Less Than Significant Impact. As described in this Initial Study, the significance of all potential environmental effects were determined to be **No Impact**, **Less Than Significant Impact**, or **Less Than Significant Impact with Mitigation**

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Incorporated directly, indirectly, and cumulatively. The Project is consistent with the General Plan 2025 and General Plan 2025 FPEIR. No new cumulative impacts are anticipated beyond those previously considered in the GP 2025 FPEIR. No mitigation is required.				
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

21c. Response: ***(Source: FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program)***

Less Than Significant Impact. Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology and water quality, noise, population and housing, hazards and hazardous materials, traffic and utilities sections of this IS and found to be no impact, less than significant impact or less than significant impact with incorporation of mitigation for each of the above sections. Based on the analysis and conclusions in this Initial Study, the Project 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** and no mitigation is required.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 21083.3, 21093, 21094, 21151, Public Resources Code; Sundstrom v. County of Mendocino, 202 Cal.App.3d 296 (1988); Leonoff v. Monterey Board of Supervisors, 222 Cal.App.3d 1337 (1990).

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Mitigation Monitoring and Reporting Program

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Aesthetics	**MM AES-1:** Prior to the issuance of building permits a photometric (lighting) plan shall be approved by the Community & Economic Development Department, Planning Division, to prevent light spillage from the parking areas in the south portion of the site onto the adjacent Box Springs Mountain Reserve Park. The approved light design requirements shall be included on the final building plan sheets. The lighting plan shall incorporate the following requirements: • The project shall be designed in such a manner as to prevent light spillage from the project to the adjacent and nearby open space areas. • Project lighting shall not exceed an intensity of one foot-candle. • Shielding shall be employed, where feasible. • Any night lighting shall be directed away from natural open space areas and directed downward and towards the center of the development. • No project lights shall blink, flash, oscillate, or be of unusually high intensity or brightness. • Energy-efficient LPS or HPS lamps shall be used exclusively throughout the project site to dampen glare. • Exterior lights shall be only "warm" LED lights (<3000K color temperature).	Submittal of Photometric Plan by Applicant. Approval of Photometric Plan by Community & Economic Development Department, Planning Division.	Prior to issuance of building permits.	Project Applicant Community & Economic Development Department – Planning Division Building & Safety Department			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Biological Resources	**MM BIO-1:** Prior to the issuance of any grading permit that would impact potentially suitable nesting habitat for avian species, the project applicant shall retain a qualitied biologist and adhere to the following: 1. Vegetation removal activities shall be scheduled outside the nesting season ~~(September 1 to February 14 for songbirds; September 1 to January 14 for raptors)~~ to the extent feasible to avoid potential impacts to nesting birds and/or ground nesters. Therefore, vegetation removal shall be scheduled from September 1 to February 14 for songbirds and from September 1 to January 14 for raptors; and 2. Any construction activities that occur during typical nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) will require that all suitable habitat, on-site and within 300-feet surrounding the site (as feasible), be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement ground disturbances. If active nests are identified, the biologist would establish buffers around the vegetation (500 feet for raptors and sensitive species, 200 feet for non-raptors/non-sensitive species). All work within these buffers would be halted until the nesting effort is finished (i.e. the juveniles are surviving independent from the nest). The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within these areas when no other active nests are found. Alternatively, a qualified biologist may determine that construction can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). Upon completion of the survey and any follow-up construction avoidance management, a report shall be prepared and submitted to City for mitigation monitoring compliance record keeping.	Conduct a pre-construction nesting bird clearance survey and submit to the Planning Division for review/acceptance of the study.	Prior to issuance of grading permits for the project. Prior to initiation of and during construction activities. During ground-disturbing and construction activities.	Community & Economic Development Department – Planning Division Public Works Department Qualified Biologist/ Biological Monitor Project Contractor			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
Cultural Resources	**MM-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.	Provide copy of consultation logs showing Applicant's effort to contact interested tribes and the outcome of any such consultation. Halt any work in the event of inadvertent discoveries of archeological resources.	Prior to issuance of grading permits for the project.	Community & Economic Development Department, Planning Division Historic Preservation Officer Project Applicant			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	MM-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. 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: a) Project grading and development scheduling; 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; 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; d) Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and e) The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure **MM-CUL-4**.	Provide evidence to the City that a qualified Archeological Monitor has been retained. Submit Archeological Monitoring Plan for review/acceptance.	At least 30 days prior to issuance of grading permits for the project and before any ground disturbing activities.	Community & Economic Development Department - Planning Division Historic Preservation Officer			
	MM-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: 1. **Consulting Tribes Notified:** within 24 hours of discovery, the consulting tribe(s) shall be notified via email and phone. The	Developer to provide emails contacting consulting tribe(s) to the City	Within 24 hours of any discovery of Native American cultural resources.	Community & Economic Development Department - Planning Division			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	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. 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 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: 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; 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; 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 d) 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;						

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	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.						
	MM-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.	Sign-in sheet from Cultural Sensitivity Training for all construction personnel to be provided to City and included in the Phase IV Monitoring Report	Pre-grading meeting, prior to any grading activities for the project.	Community & Economic Development Department - Planning Division Project Archeologist Native American Monitors			
Hazards and Hazardous Materials	**MM HAZ-1: Building Fire Resistance and Construction Type**: All buildings shall be constructed to meet the classification of Type IIIB, which includes two 2-hour fire rated exterior walls and will comply with provisions of Section 703.2 of the 2019 CBC.	Submittal and approval of building construction documents and Building showing compliance with this mitigation measure. Installation and inspection of required construction.	Prior to issuance of building permits. Prior to the delivery of combustible building construction materials and issuance of building permits. Prior to the issuance of Certificate of Occupancy - Installation of landscaping.	Community & Economic Development Department - Planning Division & Building and Safety Fire Department City of Riverside Project Applicant Project Contractor			

	MM HAZ-2: Structural Hardening: The Project site and associated buildings shall be designed to satisfy CBC Chapter 7A requirements for materials and construction methods for exterior wildfire exposure**.** Prescriptive requirements from Chapter 7A and Chapter 15 are summarized below:
	▪ **Roofing (Section 705A)**
	  ▪ Spaces between roof decking and covering shall be blocked to prevent embers from catching.
	  ▪ Eaves and soffits shall be protected with ignition-resistant or non- combustible materials
	  ▪ Rain gutters shall be screened or enclosed to prevent accumulation of plant debris. Metal gutters shall be provided.
	▪ **Roofing (Section 1505.1)**
	  ▪ The roof shall be composed of Class A materials, such as asphalt composition shingles, tile or metal/steel.
	▪ **Vents (Section 706A)**
	  ▪ All vent openings shall be covered with 1/16" to 1/8" metal mesh as a minimum. Vents with wire mesh AND baffles are best, as well as, vents marketed specifically as ember resistant and approved by the CA State Fire Marshal. Fiberglass or plastic mesh shall not be used
	  ▪ Vents in eaves or cornices shall be protected with baffles to block embers.
	  ▪ Chimney and stovepipe outlets shall be covered with a non-combustible screen. This could include metal screen material with openings no smaller than 3/8 inch and no larger than 1⁄2 inch to prevent embers from escaping and igniting a fire.
	▪ **Exterior Covering (Section 707A)**
	  ▪ Exterior walls shall be of ignition resistant building materials, such as stucco, fiber cement, wall siding, fire retardant treated wood, or other approved materials.
	  ▪ Exterior wall materials shall be extended from the foundation to the roof.
	▪ **Exterior Windows, Skylights, and Doors (Section 708A)**
	  ▪ Dual-paned windows with one pane of tempered glass shall be installed to reduce the chance of breakage in a fire.
	  ▪ Operable skylights shall be installed with a non-combustible mesh screen (dimensions of the openings will not exceed 1/8 inch)
	  ▪ Weather stripping shall be provided around and under the garage door to prevent embers from blowing in.
		Submittal and approval of building construction documents and Building and Landscape Plans showing compliance with this mitigation measure.
		
		Installation and inspection of required construction.
			Prior to issuance of building permits.
			
			Prior to the delivery of combustible building construction materials and issuance of building permits.
			
			Prior to the issuance of Certificate of Occupancy - Installation of landscaping.
			
			Year-round
				Community & Economic Development Department - Planning Division & Building and Safety
				
				Fire Department City of Riverside
				
				Public Utilities
				
				Project Applicant
				
				Project Contractor			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
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	▪ All combustible and flammable liquids in the garage shall be stored away from ignition sources. ▪ Exterior door surface shall be noncombustible or of ignition resistant material ▪ **Decking (Section 709A)** ▪ All surfaces within 10 feet of the building shall be built with ignition- resistant, non-combustible, or other approved materials. ▪ Spaces below the decking shall be minimized to reduce the likelihood of combustible collecting underneath the deck. ▪ **Accessory structures (Section 710A)** ▪ Surfaces for accessory structures shall be made from noncombustible "hardscape" materials such as stone, tile, concrete, or decomposed granite. ▪ Exterior furniture shall be made from metal like iron or cast aluminum instead of wood, teak, wicker, or other combustible materials. ▪ Ignition resistant or non-combustible materials shall be used where fences are constructed on the property, particularly when attached to the building and/or within the 0-5' zone of the building. ▪ **Address Numbers** ▪ The address shall be 4" minimum on contrasting background and clearly visible from the road. ▪ White, stainless steel, or reflective numbers shall be used.						

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
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	MM HAZ-3: Defensible Space: Section 701A.5 of the 2019 California Building Code (CBC) and Chapter 49 of the 2019 California Fire Code (CFC) requires compliance with relevant local and state vegetation requirements for defensible space and fuel management (e.g., California Fire Code Section 4906, California Public Resources Code 4291, California Government Code 51182) to mitigate the threat of wildfire to life-safety and property protection. An AMMR (Alternate Material and Method Request) and Fire Protection Plan (FPP) were submitted, reviewed and approved by the Riverside Fire Department. The AMMR will remain part of the Project and the FPP will stay with the Project whenever it was sold. As approved, the Project will have a defensible space from 50 feet to less than 100 feet at portions of the southern border.	Submittal and approval of building construction documents and Building, Landscape, and Irrigation Plans showing compliance with this mitigation measure.	Prior to issuance of building permits.	Community & Economic Development Department - Planning Division & Building and Safety Fire Department City of Riverside Project Applicant Project Contractor			An AMMR (alternate material and method) request was submitted, reviewed and approved. This will remain part of the project. A Fire Protection Plan was submitted, reviewed and approved. The FPP will stay with the project whenever it was sold.
	MM HAZ-4: Block Wall: A 6ft tall non-combustible wall will be provided along the portions of the southern boundary, constructed into two extensions, where 100 feet of defensible space cannot be satisfied. See Figure 2: Project Site Plan for detailed locations.	Submittal and approval of building construction documents and Building, Landscape, and Irrigation Plans showing compliance with this mitigation measure.	Prior to issuance of building permits.	Community & Economic Development Department - Planning Division & Building and Safety Fire Department City of Riverside Project Applicant Project Contractor			

	MM HAZ-5: Fuel Modification Plan: Fuel Modification Plan: As described below, this is a conservative vegetation guideline within the property, including a 5-foot ember resistant zone. The FMP and Landscape plan shall be submitted to the City for review and approval prior to planting. ▪ **Fuel Modification Strategy:** In accordance with California Government Code Section 51182 along with the landscaping guidelines from Information Bulletin #08-05 and AB 3074, the following fuel modification guidelines by zone as presented in the FPP, Figure 18: Schematic for defensible space at 900 Marlborough, shall be provided around the buildings as follows: • **Zone 1A ("Ember Resistant Zone"):** A minimum of 5-foot landscape that is ember-resistant from the face of the building outward on all sides shall be maintained. In this area there shall be no possible fuels (i.e. firewood, vegetation, landscape mulch or wood chips). Clear soil, rocks, gravel or concrete shall be used. • **Zone 1B ("Green Zone"):** From 5 to 30 feet from the buildings, vegetation in this zone shall be low growing, well irrigated, fire-resistant, drought-resistant and consist of approved plant list. • **Zone 2:** From 30 to 100 feet from the buildings, vegetation in this zone shall be low growing, well irrigated and less flammable. ▪ **Irrigation:** The vegetation along the interface zone between the hillside and the buildings will be irrigated using high efficiency overhead rotors. This continuous irrigation will provide a healthy moisture content in the vegetation, reducing any dry or dead vegetation during the wildfire season. The overhead rotors will be controlled by a smart irrigation controller that uses real time weather data to adjust run times depending on local conditions, ensuring efficient use of water. Available manual overrides of the irrigation will allow additional water to be added to the vegetation should a fire encroach on the property. ▪ **Required Maintenance**: To properly mitigate wildfire propensity and spread, the fuel modification zones shall be maintained year-round by the individual property owner within their property boundary (lot lines). Vegetation management shall be completed annually by May 1 of each year and more often as needed for fire safety, as determined by the Riverside Fire Department. The Project Owner shall be responsible for all vegetation management on the site, in compliance with the FPP. The "Approved Maintenance Entity" shall be responsible for and	Submittal and approval of building construction documents and Fuel Modification, Building, Landscape, and Irrigation Plans showing compliance with this mitigation measure. Approval of Fire Service Underground and Fire Access Plans. Installation of markers for boundaries Zone 1A, 1B, and Zone 2. Installation and inspection of the water and power utilities Maintenance shall be performed year-round by the Project owner/manager and a Maintenance Schedule Log shall be kept on site at all times and made	Prior to issuance of building permits. Prior to the delivery of combustible building construction materials and issuance of building permits. Prior to planting. Prior to the issuance of Certificate of Occupancy - Installation of landscaping. Year-round	Community & Economic Development Department - Planning Division & Building and Safety Fire Department City of Riverside Public Utilities Project Applicant Project Contractor Project Owner/Manager			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	shall have the authority to ensure long term funding, ongoing compliance with all provisions of the FPP, including vegetation planting, fuel modification, vegetation management, and maintenance requirements on all private lots, under their control (if not considered biological open space). The Approved Maintenance Entity shall obtain an inspection and report from City Inspector, in May of each year, certifying that vegetation management activities throughout the Project Site have been performed pursuant to the FPP and RFD standards. ▪ **Vegetation Zone Management Guidelines** • **Zone 1A/ B** o All dead vegetation (Grass, plants, trees, leaves/needles, etc.) shall be removed. o Trees shall be trimmed to a minimum or 10 feet from other trees. o Branches hanging over roofs and dead branches within 10 feet of chimneys or exhaust outlets shall be cleared. o Gutters and roofs shall be regularly cleared of all plant material. o Flammable plants or shrubs near windows shall be removed or pruned. o Vegetation and items that could catch fire under decks shall be removed. o Plants and trees shall be separated from items that could catch fire, such as patio furniture. o Wood piles shall be moved to Zone 2. • **Zone 2** o Annual grass shall be cut or mowed to a maximum of 4 inches. o Horizontal and vertical clearance shall be maintained between grass, shrubs, and trees. o Fallen plant material (leaves, cones, bark, twigs, branches, etc.) shall be removed.	available upon City Staff request.					

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	MM HAZ-6: Fire Protection Systems ▪ **Automatic Sprinkler System:** As stated in the Section 16.08.145 of Title 16 City of Riverside Building and Construction Code: *"An automatic sprinkler system shall be installed and maintained in operable condition in all new buildings. All systems shall conform to the National Fire Protection Association Standards 13 and 13D and the Riverside Fire Department Standards and Policies."* An automatic sprinkler system, per NFPA 13 shall be provided throughout the two buildings. The system shall be installed as an early suppression, fast response ceiling (ESFR) sprinkler system. The sprinkler provisions for the main building structures shall help not only reduce any structure fires due to typical interior ignitions sources (e.g. electrical), but shall also help reduce other ignitions sources that may be introduced due to wildfire threats (e.g. embers entering the interior via breaches in the building envelope). ▪ **Water Supplies:** Two additional hydrants shall be provided to satisfy hydrant space per the CFC as amended by Riverside. The two additional hydrants are to help offset the reduced defensible space along the southern border of the building facades, and may be installed anywhere along the south side of Buildings A and B within the parking lots. This additional access to water supplies shall enhance the fire-fighting response to a wildfire along the south side where the threat is most prevalent. ▪ A 3-foot (914 mm) clear space shall be maintained around the circumference of fire hydrants. ▪ Private fire hydrants shall be periodically inspected, tested and maintained in accordance with California Code of Regulations, Title 19, Division 1, Chapter 5. ▪ The required flow rate of each private hydrant shall be determined based on the Riverside Fire Department's applicable standards and policies during the next design stage.	Submittal and approval of building construction documents and Building, Landscape, and Irrigation Plans showing compliance with this mitigation measure. Approval of Fire Service Underground and Fire Access Plans. Installation and inspection of the water and power utilities	Prior to issuance of building permits. Prior to the delivery of combustible building construction materials and issuance of building permits. Prior to the issuance of Certificate of Occupancy - Installation of landscaping.	Community & Economic Development Department - Planning Division & Building and Safety Fire Department City of Riverside Public Utilities Project Applicant Project Contractor			
	MM HAZ-7: Fire Department Access: Site access, including fire lane, driveway, and entrance road widths, primary and secondary access, gates, turnarounds, dead end lengths, signage, aerial fire apparatus access, surface, and other requirements shall comply with the requirements of the 2019 California Fire Code and City of	Submittal and approval of building construction documents and	Prior to issuance of building permits.	Community & Economic Development Department - Planning Division			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	Riverside Standards. Hydrant locations shall be identified by the installation of approved blue reflective markers, as required by the City's fire code official.	Building, Landscape, and Irrigation Plans showing compliance with this mitigation measure. Approval of Fire Access Plans.	Prior to the delivery of combustible building construction materials and issuance of building permits. Prior to the issuance of Certificate of Occupancy - Installation of landscaping.	& Building and Safety Fire Department City of Riverside Public Utilities Project Applicant Project Contractor			
Transportation	**MM TRN-1: Provide Pedestrian Network Improvements - Install Crosswalk across Marlborough Avenue at Rustin Avenue**: Prior to issuance of the first occupancy permit, the Project Applicant shall construct a crosswalk across Marlborough Avenue on the east side of Rustin Avenue. Prior to construction of the crosswalk, the Project Applicant shall submit and receive approval of the crosswalk signage and striping plan and curb ramp improvements.	The Project Applicant shall submit and receive approval of the crosswalk signage and striping plan and curb ramp improvements. Inspection of completed ADA compliant crosswalk.	Prior to issuance of first occupancy permit.	Public Works Department – Traffic Engineering Division			
	MM TRN-2: Implement Site Improvements Supporting Alternative Transportation Program: Prior to building permit issuance ~~Design Review approval~~, the Project site plan, floor plans, and lighting plan shall include the following: • The site plan shall show 14 total designated car share spaces located near building entrances. • The site plan shall include 26 total bike parking spaces, in excess of the City Code requirement of seven (7).	Submittal and approval of building construction documents, and Building and Landscape Plans showing compliance with	Prior to building permit issuance ~~design approval.~~	Public Works Department – Traffic Engineering Division			

Impact Category	Mitigation Measures	Action Required	Implementation Timing	Responsible Agency	Compliance Verification		
					Initial	Date	Comments
	• The site and floor plan shall include 16 secure employee bike parking spaces and two (2) showers. • The lighting plan shall include safe and well-lit access to transit	this mitigation measure.					