

### COMMUNITY & ECONOMIC DEVELOPMENT DEPARTMENT

## Planning Division

### Negative Declaration

1.	Case Number:	P17-0228 (Rezone), P17-0097 (Design Review), P17-0098 (Variance), and P17-0099 (Variance)
2.	Project Title:	Palm Avenue Self-Storage Facility
3.	Lead Agency:	City of Riverside Community & Economic Development Department Planning Division 3900 Main Street, 3 <sup>rd</sup> Floor Riverside, CA 92522
4.	Contact Person: Phone Number:	Sean P. Kelleher, Associate Planner (951) 826-5712
5.	Project Location:	6289 Palm Avenue, situated at the northwest corner of Palm Avenue and Dewey Avenue.
6	Project Applicant/Project	t

Project Applicant/Project	
Sponsor's Name and Address:	Palm Avenue Storage, LLC
-	7111 Indiana Avenue, #300
	Riverside, CA 92504
	Sponsor's Name and Address:

- 7. General Plan Designation: MDR Medium Density Residential
- 8. Zoning: R-1-7000 Single Family Residential

### 9. Description of Project:

Proposal by David Peery, on behalf of Kingsfield Development Corporation, to consider: 1) a Rezone of the project site from R-1-7000 - Single-Family Residential Zone to R-1-7000-CS - Single Family Residential and Commercial Storage Overlay Zones; 2) Design Review for the construction of a self-storage facility with: five self-storage buildings totaling 96,082 square feet; a 1,353 square foot management office; and outdoor storage for 5 recreational vehicles, on two contiguous parcels totaling 3.02 acres; and 3) Variances to increase the maximum building lot coverage, to increase the maximum building height and to allow buildings up to two stories.

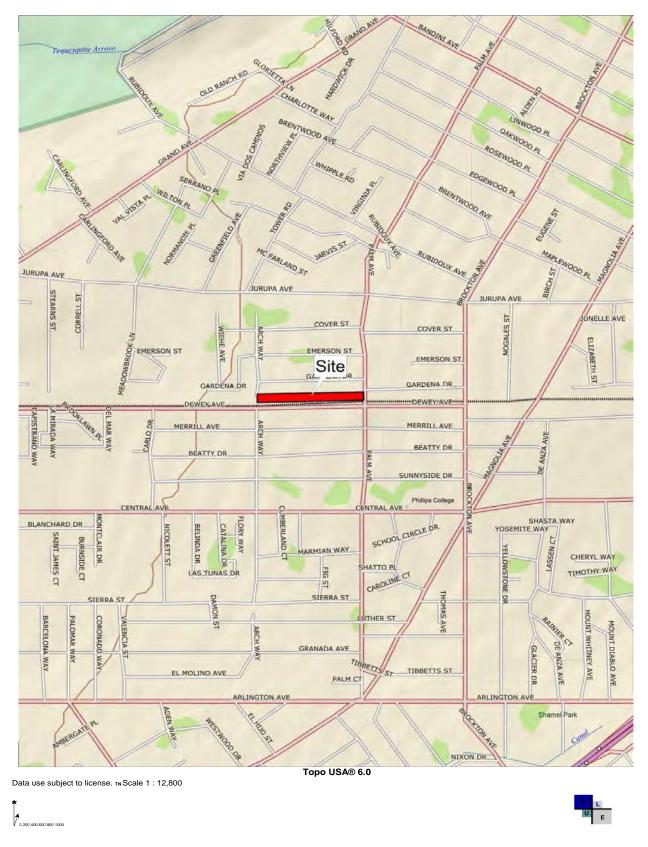
The commercial self-storage facility contains five buildings. Buildings 'A' and 'B' are located on the southern property line, adjacent to the railroad lines. Building 'A' is a two story structure that is 39,052 square feet in size and includes the 1,353 square foot management office. Building 'B' is also a two-story structure and is 39,150 square feet in size. Buildings 'C', 'D' and 'E' are located along the northern property line. Each of these buildings is one-story in height, approximately 11 feet 4 inches tall. The rear of these buildings will create a functional wall

(to the adjoining residences to the north). Building "C" is 9,600 square feet in size. Building "D" is 4,080 square feet in size. Building "E" is 4,200 square feet in size. The site will also have parking for five recreational buildings adjacent to Building "B", generally at the southwest portion of the site. In addition to the structures and recreational vehicle parking a wrought iron fence with a metal screen and 6-foot high perimeter masonry wall will be provided to screen the storage area portion of the facility.

Access to the site will be provided from a single driveway on Palm Avenue. A second driveway onto Arch Way will be provided for emergency vehicles only and will be secured by a vehicle gate and knox box. A total of fourteen parking spaces will be provided on-site for customers, with four spaces provided in a small parking area adjacent to the management office and ten provided behind the gate for customer loading and unloading.

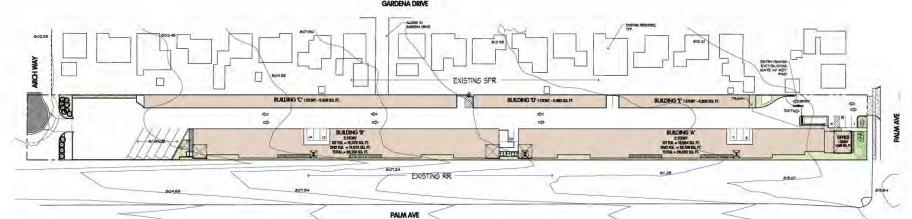
Business hours for the self-storage facility will be restricted, between the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, 9:00 a.m. to 5:00 p.m. Saturday, Sunday, and Federal Holidays.

The project site is further identified by Assessor's Parcel Number (APN) 226-332-022 and 226-332-023 and U.S. Geological Survey (USGS) Map in the northeast quarter of Section 33, T2S R5W, San Bernardino Baseline and Meridian. Location and site map, refer to Figures 1 and 2.





GARDENA DRIVE



SITE AREA:	SETBACKS	BUILDING CODES	SCOPE OF WORK:
LOT SIZE (GROSS): ±129,082 SQ. FT. ±2.96 ACRE	PER CODE SECTION 19.190.020(C), WE HAVE APPLIED A SETBACK OF 20' FROM BOTH ROWS. HOWEVER, ALONG	2016 EDITION OF THE CALIFORNIA BUILDING CODE 2016 EDITION OF THE CALIFORNIA MECHANICAL CODE 2016 EDITION OF THE CALIFORNIA PLUMBING CODE	NEW SELF-STORAGE BUILDINGS AND OFFICE WITH SITE HARDSCAPE & LANDSCAPE IMPROVEMENTS.
PROPOSED ZONE:	THE PROPERTY LINES ADJACENT TO RESIDENTIAL, SECTION 19.190.020() ALLOWS FOR PERIMETER STORAGE WALLS	2016 EDITION OF THE CALIFORNIA PLOMBING CODE 2016 EDITION OF THE CALIFORNIA ELECTRICAL CODE 2016 EDITION OF THE CALIFORNIA GREEN BUILDING STANDARDS CODE	OCCUPANCY SEPARATION:
COMMERCIAL STORAGE OVERLAY ZONE CS	WITH NO SETBACKS. PARKING:	2016 EDITION OF THE CALIFORNIA GREEN BOILDING STANDARDS CODE 2016 EDITION OF THE CALIFORNIA ENERGY CODE 2016 EDITION OF THE CALIFORNIA FIRE CODE	'NON SEPARATED OCCUPANCIES' METHOD IPER SECTION 508.3) USED. MOST RESTRICTIVE OCCUPANCY IS S-1. BUILDING HEIGHT AND AREA COMPLY, SEE CALCULATION BELOW.
LOT COVERAGE: LOT COVERAGE PROVIDED (44%) 57,273 SQ. FT.		OCCUPANCY CLASSIFICATIONS: TYPES OF	
STORAGE BUILDING GROSS AREA:	PARKING IS FACTORED AT A RATE OF 1 SPACE PER 250 SQUARE FEET OF OFFICE AREA FOR THE USE OF SELF	CONSTRUCTION:	ALLOWABLE BUILDING AREA:
BUILDING A - 2 STORY: ± 39,052 SQ. FT.	STORAGE. PARKING REQUIRED: 5 SPACES	STORAGE: S-1 ALL BUILDINGS: II - B OFFICE: B	ALLOWABLE AREA INCREASES PER STORY - PER SECTION 506 Ag = (At + (At X Is) )
BUILDING B - 2 STORY:         ± 39,150 SQ. FT.           BUILDING C - 1 STORY:         ± 9,600 SQ. FT.	PARKING PROVIDED: 14 SPACES	Office: D	At = ALLOWABLE AREA PER STORY PER TABLE 503 = 17,500 S.F.
BUILDING D - 1 STORY:         ± 4,080         SQ. FT.           BUILDING E - 1 STORY:         ± 4,200         SQ. FT.		SPRINKLERED:	IS = AREA INCREASE FACTOR DUE TO SPRINKLER PROTECTION (506.3) = 2
GROSS STORAGE AREA: ± 96,082 SQ. FT. NET RENTABLE STORAGE AREA (@80%): ±76,866 SQ. FT.		BUILDING SHALL BE FULLY SPRINKLERED IN ACCORDANCE WITH SECTION 903.3.1.1 AND NFPA 13	Aa = {17,500 + [17,500 X 2] } = 52,500 S.F. ALLOWABLE AREA PER STORY
STORAGE MANAGEMENT OFFICE: ± 1,353 SQ. FT.			
TOTAL GROSS BUILDING AREA: ± 97,435 SQ. FT.			KINGSFIELD

# PALM AVE SELF STORAGE PALM AVENUE, RIVERSIDE, CA



FIGURE 2 – Site Plan

Exhibit 8 - Mitigated Negative Declaration

iordan ARCHITECTS, INC

CA 92672-754

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

	Existing Land Use	General Plan Designation	Zoning Designation
Project Site	Undeveloped Vacant	Medium Density Residential	R-1-7000 - Single-
	Land	(MDR)	Family Residential
North	Single Family	Medium Density Residential	R-1-7000 - Single-
	Residential	(MDR)	Family Residential
South	Railroad Line and Single Family Residential	Medium Density Residential (MDR)	RWY - Railway and R- 1-7000 - Single-Family Residential
East	Single Family	Medium Density Residential	R-1-7000 - Single-
	Residential	(MDR)	Family Residential
West	Single Family	Medium Density Residential	R-1-7000 - Single-
	Residential	(MDR)	Family Residential

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

- a. South Coast Air Quality Management District (SCAQMD) Dust Control Plan
- b. Regional Water Quality Control Board (RWQCB), Santa Ana Region National Pollutant Discharge Elimination System (NPDES) Construction General Permit
- c. RWQCB, Santa Ana Region 401 Water Quality Certification Waste Discharge Requirement (WDR)
- d. Santa Ana Regional Water Quality Control Board
- e. Riverside County Airport Land Use Commission (ALUC)

### 12. Other Environmental Reviews Incorporated by Reference in this Review:

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

### 13. List of Appendices

- a. Railroad Self Storage Noise Impact Analysis, City of Riverside, prepared by Urban Crossroads, July 17, 2017; provided as Appendix 1
- b. Air Quality and GHG Impact Analyses, Railroad Self-Storage, City of Riverside, California, prepared by Urban Crossroads, July 25, 2017
- c. Phase 1 Environmental Site Assessment, prepared by LSA Associates, Inc., November 23, 2016
- d. MSHCP Consistency Analysis, Palm Avenue Self-Storage, September 6, 2017; prepared by BLUE Consulting Group
- e. Phase I Historical/Archaeological Resources Survey: Palm Ave Storage Project, City of Riverside, Riverside County, California, CRM TECH, May 8, 2017
- f. Soil Investigation Report, APN 226-332-022 and 226-332-023, City of Riverside, California, GeoMat Testing Laboratories, November 18, 2016
- g. Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017;

### 14. Acronyms

ICUZ -	Air Installation Compatible Use Zone Study
APE-	Area of Potential Effect

	Air Quality Managament Plan
AQMP - AUSD -	Air Quality Management Plan Alvord Unified School District
CEQA - CMP -	California Environmental Quality Act
	Congestion Management Plan
EIR - EMWD -	Environmental Impact Report
	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 -	Greenhouse 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
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
SOI-	Secretary of Interior
SOIS-	Secretary of Interior Standards
SR-	State Route
SWPPP -	Storm Water Pollution Prevention Plan
USGS -	United States Geologic Survey
WMWD -	Western Municipal Water District
WQMP -	Water Quality Management Plan
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### **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	Geology/Soils
Greenhouse Gas Emissions	Hazards & Hazardous Materials	Hydrology/Water Quality
Land Use/Planning	Mineral Resources	Noise Noise
Population/Housing	Public Service	Recreation
Transportation/Traffic	Tribal Resources	Utilities/Service Systems
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	Riversi	de f	finds	that	the	proposed	project	COULD	NOT	have a	significant	effect	on	the
								LARATIO					-			

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 _	12	Date _	December 14, 2017	
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Printed Name & Title Sean P. Kelleher, Associate Planner

For City of Riverside

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## **COMMUNITY & ECONOMIC DEVELOPMENT**

### DEPARTMENT

City of Arts & Innovation

## Planning Division

## Environmental Initial Study

### **EVALUATION OF ENVIRONMENTAL IMPACTS:**

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

Exhibit 8 - Mitigated Negative Declaration

P17-0228, P17-0097, P17-0098, and P17-0099

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. 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 Final Program EIR (FPEIR) Figure 5.1-1 – Scenic and Special Boulevards and Parkways, Table 5.1-A – Scenic and Special Boulevards, and Table 5.1-B – Scenic Parkways)

**No Impact.** The City's General Plan 2025 policies aim at balancing development interests with broader community preservation objectives. There are no scenic vistas within view or within the immediate project vicinity. Mount Rubidoux, a designated city park and landmark, is located 1.5 miles to the north of the site; however, is not visible from the project site due to existing development and mature landscaping. The project site and vicinity are not designated by the City's General Plan for the preservation or uniqueness of scenic views.

The proposed project is within an urbanized area surrounded by existing development. The proposed rezone to add the CS-Commercial Storage Overlay Zone to the R-1-7000 - Single Family Residential Zone as well as the requested variances to increase the building height and allow for greater lot coverage will not have any significant impacts to scenic vistas, as the project is not located near scenic resources. Therefore, the project will have **no impact** directly, indirectly, or cumulatively to scenic vistas. No mitigation is required.

# 1b. Response: (Source: General Plan 2025 Figure CCM-4 – Master Plan of Roadways, General Plan 2025 FPEIR Figure 5.1-1 – Scenic and Special Boulevards, Parkways, Table 5.1-A – Scenic and Special Boulevards, Table 5.1-B – Scenic Parkways, the City's Urban Forest Tree Policy Manual, and Title 20 – Cultural Resources)

Less Than Significant Impact. The General Plan 2025 designates several roadways within the City as Scenic Boulevards and Parkways in order to protect scenic resources and enhance the visual character of the City. The proposed project is not located within proximity of a Scenic Boulevard or Parkway. The nearest special boulevard to the proposed project is Magnolia Avenue, which is located approximately 0.4 miles to the east of the project site. The site cannot be seen from that location due to intervening terrain and structures. The proposed project including a variance requesting an increase in building height and to allow for greater lot coverage, will not have any impacts to scenic vista, as there are no scenic vistas within the project vicinity and the project site is not adjacent to a designated scenic highway or special parkway as defined by the General Plan. The proposed project will not have an effect on any scenic resources within a state scenic highway. Any potential adverse direct, indirect, or cumulative impacts from this project will result in **less than significant impacts**. No mitigation is required.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?			$\square$		
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## 1c. Response: (Source: General Plan 2025, General Plan 2025 FPEIR, Zoning Code, Citywide Design and Sign Guidelines)

**Less Than Significant Impact.** The proposed project is a commercial storage facility located within a long and narrow graded vacant lot adjacent to a rail line. Construction of the proposed storage buildings on the project site would alter the existing visual character of the vacant project site. However, the storage facility has been architecturally designed to fit into the surrounding neighborhoods. With the projects proximity to single-family neighborhoods, various materials similar in nature to those in the surrounding neighborhoods have been utilized in the architectural design of the project.

The residences to the north will also benefit from the one-story buildings which not only provide a visual barrier to the train tracks but will also give a secure boundary along the entire northern property line. The proposed project will comply with all the design requirements of the Zoning Code and the Citywide Design Guidelines to assure quality site design and building architecture that is of high quality. This includes installation of landscaping, articulated and decorative screening walls and

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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facades, window fenestration and varying roof design, consistent with the Citywide Design Guidelines. Due to all these factors, direct, indirect and cumulative impacts on the visual character and quality of the area are **less than significant impacts**.

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

#### 1d. Response: (Source: Project Plans, General Plan 2025, General Plan 2025 FPEIR Figure 5.1-2 – Mount Palomar Lighting Area, Title 19 – Article VIII – Chapter 19.556 – Lighting, Citywide Design and Sign Guidelines, and Title 19 – Article VIII – Chapter 19.710 – Design Review.

**Less Than Significant Impact.** The project will not result in a new source of substantial light or glare that would adversely affect day or nighttime views. New light sources would include those associated with the: self-storage buildings, parking spaces, landscape, and street lights. The projects photometric plan demonstrates compliance with *Chapter 19.556 – Lighting* of the Riverside Municipal Code as it has been designed, to provide a minimum intensity of one foot-candle and a maximum of ten foot-candles at ground level throughout the areas serving the public and used for parking, with a ratio of average light to minimum light of four to one (4:1). Light sources are shielded to minimize off-site glare. Furthermore, the project site is located outside of all Mount Palomar Lighting zones. As such, the project will have **less than significant impacts** directly, indirectly, or cumulatively that would adversely affect day or nighttime views due to glare and lighting. No mitigation is required.

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 timber- land, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				
<ul> <li>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?</li> </ul>				

## 2a. Response: (Source: General Plan 2025 – Figure OS-2 – Agricultural Suitability & General Plan 2025 FPEIR – Appendix I – Designated Farmland Table)

**No Impact.** The project is located within an urbanized area. A review of Figure OS-2 – Agricultural Suitability of the General Plan 2025 reveals that the project site is not designated as, and is not adjacent to or in proximity to any land classified as, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. Therefore, the project will have **no impact** directly, indirectly, or cumulatively to Farmland. No mitigation is required.

b. Conflict with existing zoning for agricultural use, or a		$\square$
Williamson Act contract?		

## 2b. Response: (Source: General Plan 2025 – Figure OS-3 - Williamson Act Preserves, General Plan 2025 FPEIR – Figure 5.2-4 – Proposed Zones Permitting Agricultural Uses, and Title 19)

**No Impact.** A review of Figure 5.2-2 – Williamson Act Preserves of the General Plan 2025 FPEIR reveals that the project site is not located within an area that is affected by a Williamson Act Preserve or under a Williamson Act contract. Moreover, the project site is not zoned for agricultural use and is not next to land zoned for agricultural use; therefore, the project will have **no impact** directly, indirectly, or cumulatively to agricultural zoning or Williamson Act contract lands. No mitigation is required.

<ul> <li>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))?</li> </ul>				$\boxtimes$
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### 2c. Response: (Source: Zoning Map of the City of Riverside; RMC Title 19 – Zoning; and General Plan 2025 Open Space and Conservation Element Figure OS-5 - Habitat Areas and Vegetation Communities, GIS Map – Forest Data)

**No Impact.** The project site is located within the R-1-7000 - Single-Family Residential Zone and will be rezoned to add the CS - Commercial Storage Overlay Zone to the Sites Zoning Designation. The site is not zoned for forest land or timberland production and no timberland is located onsite. Therefore, **no impacts** to forest land or timberland will occur from this project 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
d. Result in the loss of forest land or conversion of forest land to				

### 2d. Response: (Source: General Plan 2025 Open Space and Conservation Element Figure OS-5 - Habitat Areas and Vegetation Communities and National Forest Locator Map, GIS Map – Forest Data)

**No Impact.** The City of Riverside has no forest land that can support 10-percent native tree cover nor does it have any timberland, therefore **no impacts** will occur from this project directly, indirectly or cumulatively.

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?				$\boxtimes$
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### 2e. Response: (Source: General Plan – Figure OS-2 – Agricultural Suitability, Figure OS-3 – Williamson Act Preserves, General Plan 2025 FPEIR – Appendix I – Designated Farmland Table, Title 19 – Article V – Chapter 19.100 – Residential Zones – RC Zone and RA-5 Zone)

**No Impact.** The project is located in an urbanized area of the City designated as "Urban/Built-Out Land" by the California Department of Conservation and does not support agricultural resources or operations. The project will not result in the conversion of designated farmland to non-agricultural uses. In addition, there are no agricultural resources or operations, including farmlands within proximity of the subject site. The City of Riverside has no forest land that can support 10-percent native tree cover. Therefore, **no impacts** will occur from this project directly, indirectly or cumulatively to conversion of Farmland, to non-agricultural use or to the loss of forest land.

	SUES (AND SUPPORTING NFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3.	<b>AIR QUALITY.</b> 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:	1			
	<b>a.</b> Conflict with or obstruct implementation of the applicable air quality plan?			$\square$	

3a. Response: (Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2012 Air Quality Management Plan, Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017, Height and Coverage Variance Justification Forms, 2017)

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). The Basin includes all of Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAQMD and the Southern California Association of Governments (SCAG) adopted an Air Quality Management Plan (AQMP), the main purpose of which is to describe air pollution control strategies to be taken by a city, county, or region classified as a nonattainment area in order to bring the area into compliance with federal and state air quality standards. A nonattainment area is considered to have air quality worse than the National Ambient Air Quality Standards (NAAQS) as defined in the Federal Clean Air Act. The Basin is in nonattainment for the federal and state standards for ozone (O3) and particulate matter less than 2.5 microns in diameter (PM2.5) and in nonattainment for the state standards for particulate matter less than 10 microns in diameter (PM10) and nitrogen dioxide (NO2). The Basin is in attainment/maintenance/unclassified status for all other federal and state criteria pollutant standards.

Consistency with the 2012 AQMP for the Basin means that a project would be consistent with the goals, objectives, and assumptions in the respective plan to achieve the federal and state air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD *CEQA Air Quality Handbook*, consistency with the Basin 2012 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation; and (2) is consistent with the growth assumptions in the AQMP. For the proposed project to be consistent with the AQMP adopted by the SCAQMD, the pollutants emitted from the project should not exceed the SCAQMD daily threshold or cause a significant impact on air quality, or the project must already have been included in the AQMP projections. Additionally, if feasible mitigation measures are implemented and shown to reduce the impact level from significant to less than significant, a project may be deemed consistent with the AQMP.

According to the *CEQA Air Quality Handbook*, consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. The proposed uses are not currently consistent with the zoning designation for the project site and its surrounding area. A request for a zone change to add the CS- Commercial Storage Overlay Zone to the existing R-1-7000 - Single-Family Residential Zone has been submitted.

The City's General Plan is consistent with the SCAG Regional Comprehensive Plan Guidelines and the SCAQMD AQMP. In addition, the proposed project is not considered a significant project (e.g., airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste disposal sites, and offshore drilling facilities). As discussed in Response 3b, below, the proposed project's short-term construction and long-term pollutant emissions would be less than the emissions thresholds established in the SCAQMD's *CEQA Air Quality Handbook*; therefore, the project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation. For these reasons, the proposed project is consistent with the City's General Plan and the regional AQMP. Therefore, impacts related to implementation of the AQMP would be **less than significant**.

UES (AND SUPPORTING DRMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Violate any air quality standard or contribute substantially to an				1

## **3b.** Response: (Source: Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017; CEQA Air Quality Handbook, South Coast Air Quality Management District (SCAQMD), April 1993)

**Less Than Significant Impact.** Per General Plan 2025 FPEIR MM Air 1 and 7, a CalEEMod computer model analysis was conducted for both short-term construction and long-term operational impacts. While the start date identified in the study has passed, the identified impacts remain less than significant.

### Short-term impacts

Construction activities produce combustion emissions from various sources, such as grading, site preparation, utility engines, and motor vehicles transporting the construction crew. Exhaust emissions from construction activities envisioned on site would vary daily as construction activity levels change. The use of construction equipment on site would result in localized exhaust emissions. Grading is expected to be balanced on-site, with little or no off-site transport of soils/dirts. Based on the SCAQMD guidelines, this project is not expected to disturb more than 5 acres on a daily basis.

The most recent version of the CalEEMod model was used to calculate the construction emissions, as summarized in the table below. The emissions rates shown are derived from the default CalEEMod construction emission input variables, which assume compliance with standard construction emissions control regulatory measures. Since no exceedances of any criteria pollutants are expected, no significant impacts would occur for project construction.

TABLE 3-4 EMISSIONS SUMMARY OF OVERALL CONSTRUCTION								
Voor		Emissions (pounds per day)						
Year	VOC	NOx	СО	SOx	PM10	PM2.5		
2017	3.82	46.35	19.94	0.0483	5.09	3.00		
2018	45.27	23.87	19.00	0.0349	1.91	1.45		
Maximum Daily Emissions	45.27	46.35	19.94	0.0483	5.09	3.00		
SCAQMD Regional Threshold	75	100	550	150	150	55		
Threshold Exceeded?	NO	NO	NO	NO	NO	NO		

Source: Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017

### Long-term impacts:

Operational-source emissions are summarized on Table 3-5. Project operational-source emissions would not exceed applicable SCAQMD regional thresholds of significance. Therefore, a less than significant impact would occur and no mitigation is required.

TABLE 3-5: SUMMARY OF PEAK OPERATIONAL EMISSIONS									
Operational Activities – Summer Emissions (pounds per day)									
Scenario	VOC	NO <sub>x</sub>	СО	SOx	PM10	PM <sub>2.5</sub>			
Area Source	2.16	9.00E-05	0.01	0.00	4.00E-05	4.00E-05			
Energy Source	5.86E-03	0.0533	0.0447	3.20E-04	4.05E-03	4.05E-03			
Mobile	0.43	2.18	6.39	0.0194	1.48	0.41			
Total Maximum Daily Emissions	2.60	2.23	6.44	0.0198	1.48	0.42			
SCAQMD Regional Threshold	55	55	550	150	150	55			
Threshold Exceeded?	NO	NO	NO	NO	NO	NO			
Onerational Activities Winter Secondria		En	nissions (p	ounds per da	ay)				
<b>Operational Activities – Winter Scenario</b>	VOC	NOx	CO	SOx	PM10	PM2.5			
Area Source	2.16	9.00E-05	0.01	0.00	4.00E-05	4.00E-05			
Energy Source	5.86E-03	0.0533	0.0447	3.20E-04	4.05E-03	4.05E-03			

Exhibit 8 - Mitigated Negative Declaration

P17-0228, P17-0097, P17-0098, and P17-0099

ISSUES (AND SUPPORTING INFORMATION SOURCES):			Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	
Mobile	0.41	2.24	5.94	0.0184	1.48	0.41
Total Maximum Daily Emissions	2.58	2.30	6.00	0.0187	1.48	0.42
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	NO	NO	NO	NO	NO	NO
Source: Air Quality and Greenhouse Gas	Analysis, Urb	an Crossroad	ls, July 2017			

The above tables compare the project emissions (short-term/construction-related and long-term/operational) to the SCAQMD daily thresholds and shows that established thresholds will not be exceeded. Therefore, because the project will not violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, and will be subject to further mitigation the impacts directly, indirectly and cumulatively will be **less than significant impacts** to ambient air quality and to contributing to an existing air quality violation.

### Carbon Monoxide Hotspot

The South Coast Air Quality Management District (SCAQMD) 2003 AQMP and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan), peak carbon monoxide concentrations in the SCAB were a result of unusual meteorological and topographical conditions and not a result of traffic volumes and congestion at a particular intersection. As evidence of this, for example, 9.3 ppm 8-hr CO concentration measured at the Long Beach Blvd. and Imperial Hwy. intersection (highest CO generating intersection within the "hot spot" analysis), only 0.7 ppm was attributable to the traffic volumes and congestion at this intersection; the remaining 8.6 ppm were due to the ambient air measurements at the time the 2003 AQMP was prepared. In contrast, the ambient 8-hr CO concentration within the project study area is estimated at 1.4 ppm—1.6 ppm. Therefore, even if the traffic volumes for the proposed project were double or even triple of the traffic volumes generated at the Long Beach Blvd. and Imperial Hwy. intersection, coupled with the on-going improvements in ambient air quality, the project would not be capable of resulting in a CO "hot spot" at any study area intersections.

Similar considerations are also employed by other Air Districts when evaluating potential CO concentration impacts. More specifically, the Bay Area Air Quality Management District (BAAQMD) concludes that under existing and future vehicle emission rates, a given project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour— or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (24). Traffic volumes generating the CO concentrations for the "hot spot" analysis, shown on Table 3- 9. The busiest intersection evaluated was that at Wilshire Blvd. and Veteran Ave., which has a daily traffic volume of approximately 100,000 vehicles per day. The 2003 AQMP estimated that the 1-hour concentration for this intersection was 4.6 ppm; this indicates that, should the daily traffic volume increase four times to 400,000 vehicles per day, CO concentrations (4.6 ppm x 4= 18.4 ppm) would still not likely exceed the most stringent 1-hour CO standard (20.0 ppm).3 The highest average daily trips at project buildout would be lower than the highest daily traffic volumes generated at the busiest intersection in the CO "hot spot" analysis.

The proposed project considered herein would not produce the volume of traffic required to generate a CO "hot spot" either in the context of the 2003 Los Angeles hot spot study, or based on representative BAAQMD CO threshold considerations. Therefore, CO "hot spots" are not an environmental impact of concern for the proposed project. Localized air quality impacts related to mobile-source emissions would therefore be less than significant.

c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?				
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#### 3c. Response: (Source: Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, URBEMIS 2007 or CalEEMod, Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017)

**Less Than Significant Impact.** Per the GP 2025 FPEIR, AQMP thresholds indicate future construction activities under the General Plan are projected to result in significant levels of NOx and ROG, both ozone precursors, PM-10, PM-2.5 and CO. Although long-term emissions are expected to decrease by 2025, all criteria pollutants remain above the SCAQMD thresholds.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The portion of the Basin within which the City is located is designated as a non-attainment area for ozone, PM-10 and PM-2.5 under State standards, and as a non-attainment area for ozone, carbon monoxide, PM-10, and PM-2.5 under Federal standards.

Because the proposed project is consistent with the General Plan 2025, cumulative impacts related to criteria pollutants as a result of the project were previously evaluated as part of the cumulative analysis of build out anticipated under the General Plan 2025 Program. As a result, the proposed project does not result in any new significant impacts that were not previously evaluated and for which a statement of overriding considerations was adopted as part of the General Plan 2025 FPEIR. Therefore, cumulative air quality emissions impacts are **less than significant**.

d.	Expose sensitive receptors to substantial pollutant concentra-		$\square$	
	tions?			

#### 3d. Response: (Source: Source: General Plan 2025 FPEIR Table 5.3-B SCAQMD CEQA Regional Significance Thresholds, South Coast Air Quality Management District's 2007 Air Quality Management Plan, URBEMIS 2007 or CalEEMod, Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017)

Less Than Significant Impact. As part of SCAQMD's environmental justice program, attention has recently been focusing more on the localized effects of air quality. Although the region may be in attainment for a particular criteria pollutant, localized emissions from construction activities coupled with ambient pollutant levels can cause localized increases in criteria pollutant that exceed national and/or State air quality standards. The SCAQMD has issued guidance on applying CalEEMod modeling results to Localized Significance Thresholds (LST) analyses. Sensitive receptors include residences, schools, hospitals, and similar uses that are sensitive to noise and air pollutants. There are existing residential uses adjacent to the project site.

Construction of the proposed project would include the use of diesel-powered equipment that releases diesel particulate matter (DPM), a toxic air contaminant with known carcinogenic and chronic health effects. Short-term impacts associated with construction from General Plan 2025 typical build out will result in increased air emissions from grading, earthmoving, and construction activities. Mitigation Measures of the General Plan 2025 FPEIR requires individual development to employ construction approaches that minimize pollutant emissions (General Plan 2025 FPEIR MM AIR 1- MM AIR 5, e.g., watering for dust control, tuning equipment, limiting truck idling times). In conformance with the General Plan 2025 FPEIR MM AIR 1 and MM AIR 7 a CalEEMod computer model analyzed short-term construction and long-term operational related impacts of the project and determined that the proposed project would not exceed SCAQMD thresholds for short-term construction and long-term operational impacts.

TABLE 3-4: EMISSIONS SUMMARY OF OVERALL CONSTRUCTION							
Year		Emissions (pounds per day)					
fear	VOC	NOx	СО	SOx	PM10	PM2.5	
2017	3.82	46.35	19.94	0.0483	5.09	3.00	
2018	45.27	23.87	19.00	0.0349	1.91	1.45	
Maximum Daily Emissions	45.27	46.35	19.94	0.0483	5.09	3.00	
SCAQMD Regional Threshold	75	100	550	150	150	55	
Threshold Exceeded?	NO	NO	NO	NO	NO	NO	

### **ISSUES (AND SUPPORTING INFORMATION SOURCES):**

Potentially Significant Impact

Less Than Less Than Significant Significant With Mitigation Incorporated

Impact

No Impact

TABLE 3-5: SUMMARY OF PEAK OPERATIONAL EMISSIONS							
Oneventional Activities Summer Secondria		Emissions (pounds per day)					
Operational Activities – Summer Scenario	VOC	NOx	СО	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>	
Area Source	2.16	9.00E-05	0.01	0.00	4.00E-05	4.00E-05	
Energy Source	5.86E-03	0.0533	0.0447	3.20E-04	4.05E-03	4.05E-03	
Mobile	0.43	2.18	6.39	0.0194	1.48	0.41	
Total Maximum Daily Emissions	2.60	2.23	6.44	0.0198	1.48	0.42	
SCAQMD Regional Threshold	55	55	550	150	150	55	
Threshold Exceeded?	NO	NO	NO	NO	NO	NO	
Operational Activities – Winter Scenario		Er	nissions (po	unds per da	ıy)		
Operational Activities – Winter Scenario	VOC	NOx	со	SO <sub>x</sub>	PM10	PM <sub>2.5</sub>	
Area Source	2.16	9.00E-05	0.01	0.00	4.00E-05	4.00E-05	
Energy Source	5.86E-03	0.0533	0.0447	3.20E-04	4.05E-03	4.05E-03	
Mobile	0.41	2.24	5.94	0.0184	1.48	0.41	
Total Maximum Daily Emissions	2.58	2.30	6.00	0.0187	1.48	0.42	
SCAQMD Regional Threshold	55	55	550	150	150	55	
Threshold Exceeded?	NO	NO	NO	NO	NO	NO	

Because the proposed project is a commercial self-storage development, the operational phase of the project is not anticipated to generate significant quantities of toxic air contaminant emissions. Therefore, sensitive receptors are not expected to be exposed to substantial pollutant concentrations from operational emissions associated with the proposed project. The project will not result in local emissions in excessive of applicable screening thresholds. Impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant and no mitigation is required.

e. Create objectionable odors affecting a substantial number of people?			$\square$	
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### 3e. Response: (Source: Air Quality and Greenhouse Gas Analysis Urban Crossroads, July 2017)

Less Than Significant Impact. According to the CEQA Air Quality Handbook, land uses associated with odor complaints include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations (such as manufacturing uses that produce chemicals paper, etc.). The proposed use of the site as a commercial self-storage facility would not result in any new odor emissions. Furthermore the proposed use will need to operate in compliance with SCAQMD Rule 402, the project is not anticipated to cause objectionable odors affecting a substantial number of people and a less than significant impact will occur directly, indirectly or cumulatively for this project.

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: General Plan 2025 – Figure OS-6 – Stephens' 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, Riverside County Integrated Project Conservation Summary Report Generator, Palm Storage Habitat Assessment, BLUE Consulting Group September 6, 2017)

Less Than Significant Impact. The project site is located on a previously disturbed and vacant site within an urbanized area. A habitat assessment was prepared for the project. The findings of the habitat assessment determined that the project is in compliance with the MSHCP, and shows that, no candidate, sensitive, species of concern, or special status species or suitable habitat for such species occurs on site. Mature ornamental landscaping is present, including a mature palm tree onsite, adjacent to Palm Avenue, which may provide nesting habitat for birds, nesting birds – no birds or nests were observed. As a standard practice, a condition of approval will be added specifying that, in the event that vegetation clearing is necessary during the nesting season, a qualified biologist should conduct a preconstruction survey to identify the locations of nests within the areas affected by clearing activities. An exclusionary zone should be established around any active nest. The dimensions of the zone should be determined by a qualified biologist and is dependent on the species of bird detected. This zone should be clearly marked in the field, and construction or clearing should not be conducted within this zone until the biologist determines the nest is no longer active. With the above noted condition of approval in place, a less than significant impact directly, indirectly and cumulatively will occur to federally endangered threatened, or rare species or their habitats.

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?				$\boxtimes$
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4b. Response: (Source: Soil Investigation Report (Geomat), General Plan 2025 – Figure OS-6 – Stephens' 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, Palm Storage Habitat Assessment, BLUE Consulting Group September 6, 2017))

**No Impact.** The project is located on vacant and previously graded and maintained property within an urbanized area. As required under the MSHCP, a habitat assessment was prepared for the project. The habitat assessment finds the proposed project complies with Section 6.1.2 of the MSHCP, which outlines the requirements and protection of riparian/riverine areas and vernal pools within the plan area. The onsite biological survey was completed by qualified biologist Michael Jefferson, BLUE Consulting Group (September 6, 2017). This assessment included identification and mapping of potential sensitive species, habitats, riparian/riverine areas, vernal pools and fairy shrimp. The assessment considered species composition, topography/ hydrology, and soil analysis. Per the soils report and onsite investigation, no appropriate soils, riparian habitat or other sensitive natural community was observed on site or within proximity to the project site. Through compliance with MSHCP Section 6.1.2 and other applicable requirements, impacts to any riparian habitat, vernal pools/fairy shrimp or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Services are found to have a less than significant impact directly, indirectly and cumulatively. Therefore, the project will have **no impact** on any riparian habitat, vernal pool or other sensitive natural community identified in local or

ISSUES (AND SUPPORTING INFORMATION SOURCES): Potentially Significant Impact Nitigation Incornorated	Impact With Impact Mitigation
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regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service directly, indirectly, or cumulatively. No mitigation is required.

through direct removal, filling, hydrological interruption, or other means?	C.					
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### 4c. Response: (Source: City of Riverside GIS/CADME USGS Quad Map Layer, Palm Storage Habitat Assessment, BLUE Consulting Group September 6, 2017)

**No Impact.** The onsite biological survey included identification and mapping of potential sensitive species, habitats, riparian/riverine areas, vernal pools and fairy shrimp. The assessment considered species composition, topography/ hydrology, and soil analysis. Per the soils report and onsite investigation, no appropriate soils, riparian habitat or other sensitive natural community was observed on site or within proximity to the project site. The project is located within an urbanized area where no federally protected wetlands as defined by Section 404 of the Clean Water Act (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, vernal pools, or hydric soils and thus does not include U.S. Army Corps of Engineers jurisdictional drainages or wetlands. Therefore, the proposed project would have **no impact** to federally protected wetlands as defined by Section 404 of the Clean Water Act directly, indirectly, or cumulatively. 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?				$\boxtimes$
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## 4d. Response: (Source: MSHCP, General Plan 2025 – Figure OS-7 – MSHCP Cores and Linkage, Palm Storage Habitat Assessment, BLUE Consulting Group September 6, 2017)

**No Impact.** The proposed project is subject to the MSHCP and is consistent with the General Plan 2025. The project is consistent with General Plan 2025 Policy OS-6.1 which addresses preserving wildlife migration areas in general. The project site is not located within any MSHCP Criteria Cells, Cores, Linkages and is consistent with the General Plan Open Space Element. Further, the project site is significantly degraded and does not facilitate the movement of any native resident or migratory fish or wildlife species. The project site is not used as a migratory wildlife corridor, nor does it qualify for use as a native wildlife nursery site. The project will result in no impact directly, indirectly and cumulatively to 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. Therefore, the project will have **no impact** to wildlife movement directly, indirectly, or cumulatively. No mitigation is required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
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#### 4e. Response: (Source: MSHCP, Title 16 Section 16.72.040 – Establishing the Western Riverside County MSHCP Mitigation Fee, Title 16 Section 16.40.040 – Establishing a Threatened and Endangered Species Fees, City of Riverside Urban Forest Tree Policy Manual, MSHCP, General Plan 2025, Palm Storage Habitat Assessment, BLUE Consulting Group September 6, 2017)

**Less Than Significant Impact.** Implementation of the proposed project is subject to all applicable federal, state, and local policies and regulations related to the protection of biological resources and tree preservation. In addition, the project is required to comply with Riverside Municipal Code Section 16.72.040 establishing the MSHCP mitigation fee and Section 16.40.040 establishing the Threatened and Endangered Species Fees.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The project is in compliance with the following General Plan 2025 policies: LU-27.1 (parkway canopy trees) and LU-27.4 (private property trees, enhancement of urban forest). Any project within the City of Riverside's boundaries that proposes planting a street tree within a City right-of-way must follow the *Urban Forest Tree Policy Manual*, which documents guidelines for the planting, pruning, preservation, and removal of all trees in City rights-of-way. The specifications in the Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. This project has been reviewed against these policies and found to be in compliance with the policies. Any future plantings will be in compliance with the Tree Policy Manual when planting a tree within a City right-of-way, and therefore, impacts will be **less than significant**. 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		$\boxtimes$
	plan?		

4f. Response: (Source: MSHCP, General Plan 2025 – Figure OS-6 – Stephens' Kangaroo Rat (SKR) Core Reserve and Other Habitat Conservation Plans (HCP), Stephens' Kangaroo Rat Habitat Conservation Plan, Lake Mathews Multiple Species Habitat Conservation Plan and Natural Community Conservation Plan, and El Sobrante Landfill Habitat Conservation Plan, Palm Storage Habitat Assessment, BLUE Consulting Group September 6, 2017)

**No Impact.** The project is located on a vacant site, in an urbanized area that has been previously graded and will not affect existing Habitat Conservation Plans, Natural Community Conservation Plans, or other approved local, regional, or state habitat conservation plans directly, indirectly, or cumulatively. Therefore, the project will have **no impact** on the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No mitigation is required.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>5. CULTURAL RESOURCES. Would the project:</li> <li>a. Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 of the CEQA</li> </ul>				
Guidelines?				

5a. Response: (Source: GP 2025 FPEIR Table 5.5-A Historical Districts and Neighborhood Conservation Areas, Appendix D, Title 20 of the Riverside Municipal Code, and Phase I Historical/Archaeological Resources Survey, CRM Tech May 2017)

**Less than Significant Impact.** A Phase 1 Historical/Archaeological Resources Survey was prepared by CRM Tech for the project site. No on-site cultural, historic or paleontological resources were identified that meet CEQA's definition of a historic resource. Therefore, a **less than significant impact** for direct, indirect and/or cumulative historical resources are expected.

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

## 5b. Response: (Source: General Plan 2025 FPEIR – Figures 5.5-1 Archaeological Sensitivity and 5.5-2 Prehistoric Cultural Resource Sensitivity; Phase I Historical/Archaeological Resources Survey, CRM Tech May 2017)

Less Than Significant Impact with Mitigation. According to the Riverside General Plan EIR Figures 5.5-1 and 5.5-2, the project site is in an area of unknown archaeological and prehistoric cultural resource sensitivity. As part of the *Cultural Resources Assessment*, a records search for the project was conducted at the Eastern Information Center (EIC), located at University of California, Riverside. The records search included the project site and a 1-mile radius around the site. The EIC houses the pertinent archaeological and historic site and survey information necessary to determine whether cultural resources are known to exist within the project area. The records search included a review of all recorded historic and prehistoric archaeological sites within the 1-mile radius of the project site, as well as a review of known cultural resource survey and excavation reports. Historic aerials and topographic maps ranging from 1901 through the present were also reviewed. In addition, a pedestrian survey of all accessible exposed areas on the project site was conducted. The purpose of this survey was to identify and document, prior to the beginning of ground-disturbing activities, any cultural resources and thus also to identify any area(s) that might be sensitive for buried cultural resources.

The records search indicated that no cultural resources have been documented on the project site. The results of the records search indicate that there are no previously recorded archaeological or historic resources within or near the project site. The entire project site has been previously disturbed and graded as part of the railroad right-of-way. The Phase I onsite Archaeological survey was negative and a lack of previously recorded archaeological or historic resources within or near the project site, the sensitivity of the project site for potential subsurface cultural resources is negligible. However, with implementation of the following Mitigation Measures (MM-CUL1-4), impacts related to previously undiscovered archaeological resources would be **less than significant with mitigation implemented**.

### Mitigation Measures:

**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 interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and interested 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.

**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.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact	
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- 1. The project archaeologist, in consultation with interested 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. **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
- 2. **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 an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum 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 interested 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.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		$\square$		

5c. Response: (Source: General Plan 2025 Policy HP-1.3; GP 2025 FPEIR Figure 5.5-2 – Prehistoric Cultural Resources Sensitivity, Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016).

Less Than Significant Impact with Mitigation Incorporated. According to the General Plan 2025 FPEIR, the project site is located in an area with low prehistoric cultural resource sensitivity. Furthermore, the soil investigation report indicated the site does not support older Alluvial Fan deposits (which support high paleontological sensitivity). The exposed surficial material is classified as fill dirt and moderately dense to dense silty sand and clayey sand (USCS "SM and SC"), soil 'Type B'. This soil type does not support high paleontological sensitivity. The entire project site has been previously disturbed with grading associated with the development of the railroad and the railroad right of way and adjacent infrastructure. In the event that paleontological materials are uncovered, Mitigation Measure CUL-2 will ensure that uncovered resources are evaluated, left in place if possible, or curated as recommended by a qualified paleontologist. Impacts to paleontological resources will be less than significant with mitigation incorporated:

d. Disturb any human remains, including those interred outside of		
formal cemeteries?		

### 5d. Response: (Source: GP 2025 FPEIR Figure 5.5-1 - Archaeological Sensitivity and Figure 5.5-2 - Prehistoric Cultural Resources Sensitivity; Phase I Historical/Archaeological Resources Survey, CRM Tech May 2017)

Less Than Significant Impact. The project site has previously been heavily disturbed. The literature review and record searches conducted as part of the Phase 1 Cultural Resources Inventory did not provide any indication that human remains are present on or near the site. Thus, there is limited potential for human remains to be present on site, and the proposed project is not expected to disturb human remains.

Figure 5.5-1 in the FPEIR for the General Plan 2025 shows that the site is located in an area with unknown archaeological sensitivity, and Figure 5.5-2 shows the site has unknown prehistoric cultural resources sensitivity. Thus, excavation and soil disturbance could have the potential to disturb or destroy unknown buried Native American human remains and other human remains, including those interred outside formal cemeteries. Should grading and excavation activities for construction of the proposed project unearth unknown human remains or unknown burials, compliance with existing regulatory requirements under Section 7050.5 of the California Health and Safety Code is required. This states that if human remains are encountered during excavation activities, the County Coroner shall be notified within 24 hours of the discovery. No further excavation or disturbance of the site or any nearby areas reasonably suspected to overlie adjacent remains would occur until the County Coroner has determined, within two working days of notification of the discovery, the appropriate treatment and disposition of the human remains.

If the remains are determined to be are or are believed to be Native American human remains, the County Coroner is required to notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with Section 5097.98 of the California Public Resources Code, the NAHC would immediately notify the persons it believes to be the most likely descendant (MLD) of the deceased Native American. The descendants would complete their inspection and make a recommendation within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the City and the Developer, the disposition of the human remains. The MLD's recommendation would be followed if feasible, and may include scientific removal and non-destructive analysis of the human remains and any items associated with Native American burials. If the Developer rejects the MLD's recommendations, the Developer shall rebury the remains with appropriate dignity on the property in a location that would not be subject to further subsurface disturbance (California Code of Regulations, Title 14, Section 15064.5[e]). Compliance with the requirements of the California Health and Safety Code and California Public Resources Code would ensure that potential impacts to human remains, including those interred outside formal cemeteries, are **less than significant** directly, indirectly, and cumulatively.

		ES (AND SUPPORTING DRMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
6.	GF	EOLOGY AND SOILS. Would the project:				
	a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
		i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				$\boxtimes$

# 6i. Response: (Source: Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016, General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report).

**No Impact.** Seismic activity is to be expected in Southern California; however, there are no Alquist-Priolo zones in the project area. The project site does not contain any known fault lines and the potential for fault rupture or seismic shaking is low. Compliance with the California Building Code regulations will ensure that **no impacts** related to strong seismic ground will occur directly, indirectly, or cumulatively. No mitigation is required.

ii. Strong seismic ground shaking?			$\boxtimes$	
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#### 6ii. Response: (Source: Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016, General Plan 2025 Figure PS-1 – Regional Fault Zones & General Plan 2025 FPEIR Appendix E – Geotechnical Report).

Less Than Significant Impact. Just like most of southern California, in the event of an earthquake strong ground shaking is expected to occur on the project site. As stated in the Geotechnical Engineering Investigation prepared by GeoMat there are no known active or potentially active faults trending toward or through the site. The proposed development lies outside of any Alquist Priolo Special Studies Zone and the potential for damage due to direct fault rupture is considered very remote. The site is located in an area of high regional seismicity and the San Jacinto fault is located approximately 9.53 miles from the site. Ground shaking originating from earthquakes along other active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. As previously described in 6i, design and construction would comply with current building codes and standards which would reduce the risk of loss, injury, or death resulting from strong ground-shaking. Impacts would be less than significant.

iii. Seismic-related ground failure, including liquefaction?
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#### 6iii. Response: (Source: General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, and Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016).

Less Than Significant Impact. According to the GP 2025 Liquefaction Zones Map – Figure PS-2, the project site is located in an area with low potential for liquefaction. On-site soils consist of alluvial sands and silty sands. Borings conducted for the site-specific geotechnical study did not encounter groundwater within 50 feet of the ground surface. Based on the lack of shallow groundwater, the geotechnical study indicated that liquefaction is not a design concern for the proposed project. Incorporation of the recommended design measures of the geotechnical study for compliance with the California Building Code regulations will ensure that impacts related to seismic-related ground failure, including liquefaction, are reduced to less than significant impact levels directly, indirectly, and cumulatively. No mitigation is required.

iv. Landslides?			 
	IV. Landslides?		

<sup>6</sup>iv. Response: (Source: General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016, Title 18 – Subdivision Code, and Title 17 – Grading Code)

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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**No Impact.** Factors contributing to the stability of slopes include slope height and steepness, engineering characteristics of the earth materials comprising the slope, and intensity of ground shaking. The project site and its surroundings have generally flat topography and are not located in an area prone to landslides, per Figure 5.6-1 of the General Plan 2025 Program Final PEIR. Therefore, there will be **no impact** related to landslides directly, indirectly, or cumulatively. No mitigation is required.

b. Result in substantial soil erosion or the loss of topsoil?		$\square$	

6b. Response: (Source: Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016, General Plan 2025 FPEIR Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Title 17 – Grading Code)

**Less Than Significant Impact.** Erosion and loss of topsoil could occur as a result of the project. State and Federal requirements call for the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) establishing erosion and sediment controls for construction activities. The project must also comply with the National Pollutant Discharge Elimination System (NPDES) regulations. In addition, with the erosion control standards for which all development activity must comply, the Grading Code (Title 17) also requires the implementation of measures designed to minimize soil erosion. Compliance with State and Federal requirements as well as with Title 17 will ensure that soil erosion or loss of topsoil will be **less than significant impact** directly, indirectly and cumulatively.

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,		$\boxtimes$	
	subsidence, liquefaction or collapse?			

6c. Response: (Source: Soil Investigation Report, APN 226-332-022 and 226-332-023 GeoMat Testing Laboratories, Inc., November 2016, General Plan 2025 Figure PS-1 – Regional Fault Zones, Figure PS-2 – Liquefaction Zones, General Plan 2025 FPEIR Figure PS-3 – Soils with High Shrink-Swell Potential, Figure 5.6-1 – Areas Underlain by Steep Slope, Figure 5.6-4 – Soils and Table 5.6-B – Soil Types)

**Less Than Significant Impact.** The site is generally flat, with approximately 15 feet of elevation differential across the 1,290 foot site (east to west), sloping toward the east and a marginal slope to the south. On-site soils consist of loose to medium dense sands and silty sands. Artificial fill, comprising loose silty fine to medium sands, is located in portions of the site. Beneath fills are native alluvial soils, silty fine to medium sands and fine sandy silts.

As described previously in this section, on-site soils are not considered susceptible to landslides or liquefaction. In the absence of a shallow groundwater table, lateral spreading is also considered unlikely. The geotechnical investigation indicated that the on-site soils are somewhat compressible and ground subsidence may occur when they are exposed to loads exerted by foundations of the new structures. Per the recommendations of the Soil Investigation Report (GeoMat testing), the project shall be required to over-excavate areas of compressible soils and place compacted structural fill. In addition, adherence to the City's grading and building requirements will ensure that the property is adequately prepared to prevent the collapse of the graded pad and/or slopes. Compliance with the City's codes and the policies and the project-specific recommendations contained in the geotechnical study will ensure that impacts related to geologic conditions are reduced to **less than significant impacts** level directly, indirectly, and cumulatively. No mitigation is required.

<ul> <li>Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?</li> </ul>				$\boxtimes$	
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6d. Response: (Source: General Plan 2025 FPEIR Figure 5.6-4 – Soils, Figure 5.6-4 – Soils, Table 5.6-B – Soil Types, Figure 5.6-5 – Soils with High Shrink-Swell Potential, Appendix E –GeoMat Soil Investigation Report, and California Building Code as adopted by the City of Riverside and set out in Title 16 of the Riverside Municipal Code)

**No Impact.** Expansive soils, defined under California Building Code, expand when wet and shrink when dry. The amount and type of clay present in soil determines its shrink-swell potential. According to completed GeoMat Soil Investigation, on-site

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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soils are mostly sands and silts, and have very low to no potential for expansion. Therefore, the project site does not have expansive soils and there will be **no impact** directly, indirectly, or cumulatively. 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?				$\boxtimes$
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### 6e. Response: (Source: Project plans)

No Impact. The proposed project will be served by sewer infrastructure. Therefore, the project will have no impact. No mitigation is required.

	SUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7.	GREENHOUSE GAS EMISSIONS. Would the project:				
	a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			$\boxtimes$	

### 7a. Response: (Source: Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017)

Less Than Significant Impact. The City of Riverside has not adopted its own numeric threshold of significance for determining impacts with respect to greenhouse gas (GHG) emissions. A screening threshold of 3,000 MTCO2e per year to determine if additional analysis is required is an acceptable approach for small projects. This approach is a widely accepted screening threshold used by the County of Riverside (1) and numerous cities in the South Coast Air Basin and is based on the South Coast Air Quality Management District (SCAQMD) staff's proposed GHG screening threshold for stationary source emissions for non-industrial projects, as described in the SCAQMD's Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans ("SCAQMD Interim GHG Threshold").

Thus, and based on guidance from the SCAQMD, if a non-industrial project would emit GHGs less than 3,000 MTCO2e per year, the project is not considered a substantial GHG emitter and the GHG impact is less than significant, requiring no additional analysis and no mitigation. On the other hand, if a non-industrial project would emit GHGs in excess of 3,000 MTCO2e per year, then the project could be considered a substantial GHG emitter, requiring additional analysis and potential mitigation. As previously discussed, a screening threshold of 3,000 MTCO2e per year is an acceptable approach for small projects to determine if additional analysis is required and is therefore applied for this project.

### Short Term Emissions

The project will result in short-term greenhouse gas emissions from construction activities. Construction activities associated with the proposed Project will result in emissions of  $CO_2$  and  $CH_4$ . For construction phase Project emissions, GHGs are quantified and amortized over the life of the Project. To amortize the emissions over the life of the Project, the SCAQMD recommends calculating the total greenhouse gas emissions for the construction activities, dividing it by a 30- year project life then adding that number to the annual operational phase GHG emissions. As such, construction emissions were amortized over a 30-year period and added to the annual operational phase GHG emissions.

### Operational Emissions

The proposed project involves the operation of a self-storage facility, totaling 97,435 square feet. Operational source emissions are summarized on Table 3-5. Project operational-source emissions would not exceed applicable SCAQMD regional thresholds of significance. According to the SCAQMD LST methodology, LSTs would apply to the operational phase of a proposed project, if the project includes stationary sources, or attracts mobile sources that may spend long periods queuing and idling at the site (e.g., transfer facilities and warehouse buildings). The proposed project does not include such uses, and thus, due to the lack of significant stationary source emissions, no long-term localized significance threshold analysis is needed.

As shown on Table 4-1, the project will result in approximately 567.20 MTCO2e per year; the proposed project would not exceed the SCAQMD/City's screening threshold of 3,000 MTCO2e per year. Thus, project-related emissions would not have a significant direct or indirect impact on GHG and climate change and no mitigation or further analysis is required.

### **ISSUES (AND SUPPORTING INFORMATION SOURCES):**

Potentially Significant Impact Less Than Significant With Mitigation Incorporated Less Than

Significant

Impact

No Impact

TABLE 4-1: TOTAL PROJECT GREENHOUSE GAS EMISSIONS (ANNUAL)						
Emission Source		Emissions (m	etric tons per yea	r)		
Emission Source	CO <sub>2</sub>	CH4	N <sub>2</sub> O	Total CO <sub>2</sub> E		
Annual construction-related emissions amortized over 30 years	8.98	1.58E-03	0.00	9.02		
Area	2.40E-03	1.00E-05	0.00	2.57E-03		
Energy	84.85	3.27E-03	8.30E-04	85.18		
Mobile Sources	312.30	0.0171	0.00	312.72		
Waste	18.46	1.09	0.00	45.72		
Water Usage	99.89	0.73	0.018	123.57		
Total CO <sub>2</sub> E (All Sources)		567.20				
SCAQMD Threshold		3,000				
Significant?		NO				

As summarized in the above analysis, the project is be consistent with the strategies and goals from the Riverside Restorative Growthprint (RRG) Climate Action Plan (CAP), Global Warming Solutions Act of 2006, or Assembly Bill (AB) 32, Governor's Executive Order (EO) S-3-05, and other strategies to help reduce GHGs to the level approved by the Governor. Less Than Significant Impact. No mitigation required.

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

### 7b. Response: (Source: Riverside Restorative Growthprint Climate Action Plan; Air Quality and Greenhouse Gas Analysis, Urban Crossroads, July 2017))

**Less Than Significant Impact.** The SCAQMD supports State, Federal and international policies to reduce levels of ozone depleting gases through its Global Warming Policy and rules and has established an interim Greenhouse Gas (GHG) threshold. The project will comply with the City's General Plan policies and State Building Code provisions designed to reduce GHG emissions. As a user of electricity generated and sourced by Riverside Public Utilities, it is likely that the project's GHG emissions deriving from energy use will decline over the life of the project as RPU pursues its Renewable Portfolio Standard of 33% retail electricity sales from renewable sources by 2020 (RRG-CAP Reduction Measure SR-1).

In addition, the project would comply with all SCAQMD applicable rules and regulations during construction the construction phase and, as demonstrated in the GHG Analysis, will not interfere with the State's goals of reducing GHG emission to 1990 levels by the year 2020 as stated in AB 32 and an 80 percent reduction in GHG emissions below 1990 levels by 2050 as stated in Executive Order S-3-05. Based upon the prepared Climate Change Analysis for this project and the discussion above, the project will not conflict with any applicable plan, policy or regulation related to the reduction in the emissions of GHG and thus a **less than significant impact** will occur directly, indirectly and cumulatively in this regard.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
8. 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?			$\boxtimes$	

#### 8a. Response: (Source: Project Plans, (Source: General Plan 2025 Public Safety Element, GP 2025 FPEIR, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code, Riverside Fire Department EOP, 2002 and Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1, OEM's Strategic Plan))

**Less Than Significant Impact.** The proposed project does not directly involve the transport, use, or disposal of any hazardous material. Future tenants of the proposed project will not necessarily, but may, engage in the routine transport, use, or disposal of hazardous materials or wastes. If hazardous materials are proposed on site in the future, they will be subject to state and federal regulation for permitting and inspection by the Hazardous Materials Division of the City Fire Department. The General Plan 2025 Public Safety Element also specifies a number of policies regarding the safe handling, transport and disposal of hazardous materials, with which the project will comply (GP 2025 Policies PS-3.1 through 3.5).

Widely used hazardous materials common at any self-storage land use include paints and other solvents, cleaners, automobile fluids, and pesticides. The remnants of these and other products are disposed of as household hazardous waste (HHW) that includes used motor oil, dead batteries, electronic wastes, and other wastes that are prohibited or discouraged from being disposed of at local landfills. Use of common household hazardous materials and their disposal does not present a substantial health risk to the community. Impacts associated with the routine transport, use of hazardous materials or wastes will be **less than significant**.

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		$\boxtimes$	
	environment?			

### 8b. Response: (Source: Project Plans)

Less Than Significant Impact. The project may involve the use of hazardous materials but shall comply with all applicable federal, state, and local laws and regulations pertaining to the transport, use, disposal, handling, and storage of hazardous waste, including but not limited to Title 49 of the Code of Federal Regulations implemented by Title 13 of the CCR, which describes strict regulations for the safe transportation of hazardous materials. Compliance will be enforced by the onsite manager who will notify all facility users that the storage of hazardous materials is prohibited. In addition, onsite managers will be trained to specifically identify the transfer/unloading of such materials. Compliance with all applicable federal, state and local laws related to the transportation, use and storage of hazardous materials would reduce the likelihood and severity of accidents during transit, use and storage to a **less than significant impact** directly, indirectly, and 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?				
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8c. Response: Response: (Source: General Plan 2025 Public Safety and Education Elements, GP 2025 FPEIR Table 5.7-D - CalARP RMP Facilities in the Project Area, Figure 5.13-2 – RUSD Boundaries, Table 5.13-D RUSD Schools, Figure 5.13-3 AUSD Boundaries, Table 5.13-E AUSD Schools, Figure 5.13-4 – Other School District Boundaries, California Health and Safety Code, Title 49 of the Code of Federal Regulations, California Building Code).

Less Than Significant Impact. No schools are located within one-quarter mile of the proposed project. The nearest school is Sierra Middle school, 0.4 miles to the south-west. Although hazardous materials and/or waste generated from the proposed development may pose a health risk to nearby existing or proposed schools, all businesses that handle or have on-site transportation of hazardous materials are required to comply with the provisions of the City's Fire Code and any additional regulations as required in the California Health and Safety Code Article 1 Chapter 6.95 for the Business Emergency Plan.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Impacts associated with the exposure of schools to hazardous materials caused by this project will result in a **less than significant impact** directly, indirectly, and cumulatively. 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?			$\boxtimes$	
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# 8d. Response: (Source: General Plan 2025 Figure PS-5 – Hazardous Waste Sites, GP 2025 FPEIR Tables 5.7-A – CERCLIS Facility Information, Figure 5.7-B – Regulated Facilities in TRI Information and 5.7-C – DTSC EnviroStor Database Listed Sites)

Less Than Significant Impact. No hazardous materials sites, compiled pursuant to Government Code Section 65962.5, are depicted on or adjacent to the project location on the EnviroStor online database. In addition, the FPEIR (Figure 5.7-1) does not list any hazardous waste sites on or adjacent to the project site. Hazardous materials are not located onsite and the project will result in a less than significant impact directly, indirectly, and cumulatively. 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		$\bowtie$	
	safety hazard for people residing or working in the project			
	area?			

### 8e. Response: (Source: Riverside County Airport Land Use Commission Development Review File No.: ZAP1085R117, General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas

Less Than Significant Impact. The proposed project is located within Zones D and E of Riverside County Airport Land Use Compatibility Plan (RCALUCP) for Riverside Municipal Airport. The project was reviewed by the Riverside County Airport Land Use Commission (ALUC), File Number: ZAP1085R117, to ensure that the project is consistent with the compatibility zone as well as in compliance with the land use standards in the RCALUCP. Because the project has been found to be consistent with the RCALUCP by the ALUC, subject to conditions of approval, impacts related to hazards from airports are less than significant impacts directly, indirectly and cumulatively.

f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working		$\boxtimes$
	project testate in a surrey mazar a for propre restange of worning		
	in the project area?		

### 8f. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP)

**No Impact.** Because the proposed project is not located within proximity of a private airstrip and does not propose a private airstrip, it will not expose people residing or working in the City to safety hazards related to a private airstrip and would have **no impact** directly, indirectly, or cumulatively. No mitigation is required.

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
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### 8g. Response: (Source: Project Plans)

**Less Than Significant Impact.** The project is within an urbanized area and will be served by the surrounding network of existing, fully improved streets. All streets have been designed to meet the Public Works and Fire Department specifications. As part of the project's construction, temporary street closures may be necessary and would be implemented in accordance with a typical traffic control plan approved by the City. Any street closing will be of short duration so as not to interfere or

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

impede with any emergency response or evacuation plan. Therefore, the project will have a **less than significant impact** directly, indirectly, and cumulatively to an emergency response or evacuation plan. No mitigation is required.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?					
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# 8h. Response: (Source: General Plan 2025 Figure PS-7 – Fire Hazard Areas, GIS Map Layer VHFSZ 2010, City of Riverside's EOP, 2002, Riverside Operational Area – Multi-Jurisdictional LHMP, 2004 Part 1/Part 2 and OEM's Strategic Plan)

**No Impact.** The proposed project is located in an urbanized area where no wildlands exist and the property is not located within a Very High Fire Severity Zone (VHFSZ) or adjacent to wildland areas or a VHFSZ; therefore, **no impact** regarding wildland fires either directly, indirectly, or cumulatively from this project will occur. 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. HYDROLOGY AND WATER QUALITY. Would the project:				
a. Violate any water quality standards or waste discharge requirements?			$\boxtimes$	

### 9a. Response: (Source: Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017; GP 2025 FPEIR Table 5.8-A – Beneficial Uses Receiving Water)

Less Than Significant Impact. The project is located on a 2.96-acre property within the Santa Ana River Watershed. The project site currently is graded and undeveloped gravel/earthen ground surface. The Santa Ana Regional Water Quality Control Board (RWQCB) administers the National Pollutant Discharge Elimination System (NPDES) permit in the region. The City is required to implement all pertinent regulations of the program to control pollution discharges from new development. These regulations reduce NPS pollutant loading through the implementation of Best Management Practices (BMPs) and other control measures that minimize or eliminate pollutants from urban runoff, thereby protecting downstream water resources. BMPs implemented to address commercial pollutant sources generally involve maintenance of storm drain facilities, parking lots, vegetated areas, and educational programs. Violations of water quality standards due to urban runoff can be prevented through the continued implementation of existing regional water quality regulations. The proposed project would not interfere with the implementation of NPDES water quality regulations and standards.

The proposed project will disturb approximately 2.96 gross acres of land and therefore will be subject to National Pollutant Discharge Elimination System (NPDES) permit requirements during construction activities in addition to standard NPDES operational requirements. The proposed project will require submittal to the local reviewing agency, the Santa Ana RWQCB, a Storm Water Pollution Prevention Plan (SWPPP) that will include BMPs protects water quality during construction activities. BMPs will be required as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. These measures, which include owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, and trash storage areas, will reduce pollutants in storm water runoff and reduce non-storm water discharges to the City's storm water drainage through controlling the discharge of pollutants. Operational BMPs will be identified in a Stormwater Runoff Management Plan that will be submitted with grading and construction documents for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations. Given compliance with all applicable local, state, and federal laws regulating surface water quality, the proposed project as designed is anticipated to result in a **less than significant impact** directly, indirectly, or cumulatively to any water quality standards or waste discharge. No mitigation is required.

b.	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre- existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			$\boxtimes$	
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# 9b. Response: (Source: Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017; General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU Map of Water Supply Basins, RPU Urban Water Management Plan)

Less Than Significant Impact. The proposed project is located within the Riverside South Water Supply Basin. The project is required to connect to the City's sewer system and comply with all NPDES and WQMP requirements that will ensure the proposed project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Therefore, there will be less than significant impact to groundwater supplies and recharge either directly, indirectly or cumulatively. Therefore, the proposed project will result in a less than significant impact to groundwater supplies and recharge either directly, indirectly, indirectly, indirectly, or cumulatively. No mitigation is required.

	ES (AND SUPPORTING DRMATION 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, in a manner which would result in substantial erosion or siltation on- or off-site?			$\boxtimes$	

### 9c. Response: (Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017; Project Plans)

**Less Than Significant Impact.** The proposed project requires grading of the project site which would affect the drainage patterns of the site. However, the site's drainage plan will be designed by a registered civil engineer to safely retain, detain, and/or convey stormwater runoff. Drainage patterns would remain similar to existing conditions. No Jurisdictional/City riparian habitat or drainage features are located onsite.

Furthermore, the project is subject to NPDES requirements; areas of one acre or more of disturbance are subject to preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) for the prevention of runoff during construction. Further, existing drainage patterns on the project site, which has been designed with minimal grading, flows from east to west; proposed drainage patters after construction of the project mimic the pre-development conditions. Erosion, siltation and other possible pollutants associated with long-term implementation of projects are addressed as part of the Water Quality Management Plan (WQMP) and grading permit process. Proposed on-site low impact development (LID) principles include the implementation of BMPs including landscaping and an infiltration basin. The Project-Specific Preliminary Water Quality Management Plan (PWQMP) (See Appendix J) identifies proposed drainage management areas and the effectiveness of proposed BMPs.

According to the PWQMP, the design capture volume required to capture on-site runoff is 4,470.2 cubic feet, for a design storm depth of 0.56 inches. The proposed infiltration basins will capture approximately 4,769 cubic feet of runoff and infiltrate at a rate of less than 1 inch per hour. According to the WQMP, proposed LID BMPs fully address all drainage management areas and no alternative compliance measures are required for the proposed project. The design of the proposed project will not substantially alter drainage patterns in the area to the extent that substantial on- or off-site erosion or siltation will occur. Therefore, the project will have a **less than significant impact** directly, indirectly, or cumulatively to existing drainage patterns. No mitigation is required.

d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off- site?			$\square$	
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### 9d. Response: (Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017; Project Plans)

Less Than Significant Impact. The proposed project will require grading, which will affect the drainage patterns of the site. The project site's drainage plan has been designed by a registered civil engineer to safely retain, detain, and/or convey stormwater runoff preventing flooding on- or off-site. Impacts would be less than significant.

e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or		$\boxtimes$	
	provide substantial additional sources of polluted runoff?			

### 9e. Response: (Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017; Project Plans)

**Less Than Significant Impact.** The proposed development will increase the amount of impervious surface area in the City. This impervious area includes paved parking areas, sidewalks, roadways, and building rooftops; all sources of runoff that may carry pollutants and therefore has the potential to degrade water quality. This development has been required to prepare and implement a WQMP.

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

Preliminary BMP's, in compliance with the preliminary WQMP, have been accepted by the Public Works Department. Expected stormwater pollutants will be treated through the incorporation of the site design, source control and treatment control measures specified in the project specific WQMP. As was previously detailed in Response 9c, project-related stormwater flows will be directed to the proposed infiltration basins and infiltrate into the soil. The proposed water quality function of the basin would reduce the amount of polluted runoff that would be conveyed into the ground water. Therefore, as the expected pollutants will be mitigated through the project site design, source control, and treatment controls already integrated into the project design, the project will not create or contribute runoff water exceeding capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff and there will be a **less than significant impact** directly, indirectly or cumulatively.

f. Otherwise substantially degrade water quality?		$\boxtimes$	

### 9f. Response: (Preliminary Water Quality Management Plan (WQMP) For Palm Ave Self Storage, REC June 2017; Project Plans)

Less Than Significant Impact. The project is over one acre in size and is required to have coverage under the State's General Permit for Construction Activities (SWPPP). As stated in the Permit, during and after construction, best management practices (BMPs) will be implemented to reduce/eliminate adverse water quality impacts resulting from development. Furthermore, the City has ensured that the development does not cause adverse water quality impacts, pursuant to its Municipal Separate Storm System (MS4) permit through the project's WQMP.

The proposed development will increase the amount of impervious surface area in the City. This impervious area includes paved parking areas, sidewalks, roadways, and building rooftops; all sources of runoff that may carry pollutants and therefore has the potential to degrade water quality. This development has been required to prepare preliminary BMP's that have been reviewed and approved by Public Works. Final BMP's will be required prior to grading permit issuance. The purpose of this requirement is to insure treatment BMP's are installed/constructed as part of the project so that the pollutants generated by the project will be treated in perpetuity. Therefore, impacts related to degrading water quality are **less than significant** directly, indirectly and cumulatively.

g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				$\boxtimes$
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### 9g. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard)

**No Impact.** The project does not involve the construction of housing. There will be **no impact** caused by this project directly, indirectly, or cumulatively as it will not place housing within a 100-year flood hazard area. No mitigation is required.

h. Place within a 100-year flood hazard area structures which		
would impede or redirect flood flows?		

### 9h. Response: (Source: General Plan 2025 Figure PS-4 – Flood Hazard Areas

**No Impact.** The project site is not located within or near a 100-year flood hazard area as depicted on General Plan 2025 Program FPEIR Figure 5.8-2 – Flood Hazard Areas. Therefore, the project will not place a structure within a 100-year flood hazard area that would impede or redirect flood flows and **no impact** will 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
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			$\boxtimes$	

### 9i. Response: (Source: General Plan 2025 FPEIR Figure 5.8-2)

**Less than significant.** The project is not located within an inundation area, as depicted on General Plan 2025 Figure PS-4 – Flood Hazard Areas. Therefore, the potential to place a structure within an area that would expose people or structures to a significant risk of loss, injury, or death as a result of the failure of a levee or dam will be **less than significant** directly, indirectly, or cumulatively. No mitigation is required.

j. Inundation by seiche, tsunami, or mudflow?				$\square$
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### 9j. Response: (Source: GP 2025 FPEIR Chapter 7.5.8 – Hydrology and Water Quality)

**No Impact.** Tsunamis are large waves that occur in coastal areas; therefore, since the city is not located in a coastal area, no impacts due to tsunamis will occur directly, indirectly, or cumulatively. The proposed project site and its surroundings have generally flat topography and are within an urbanized area not within proximity to Lake Mathews, Lake Evans, the Santa Ana River, Lake Hills, Norco Hills, Box Springs Mountain Area or any of the nine arroyos that transverse the City and its sphere of influence. Therefore, **no impact** potential for seiche or mudflow exists either 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
10. LAND USE AND PLANNING: Would the project:           a. Physically divide an established community?			$\square$	

### 10a.Response: (Source: Project Plans, Variance Justifications)

Less than Significant Impact. The project site is located within the General Plan land use designation Medium Density Residential (MDR). However, a deed restriction, on the property, restricts any type of housing on the project site due to its proximity to the rail lines. Restricting residential uses on the site, limits development potential to a few uses, of which, a commercial self-storage facility was deemed to be the most compatible with surrounding development. The Project will be served by fully improved public streets and other infrastructure and does not involve the subdivision of land or the creation of streets that could alter the existing surrounding pattern of development or an established community. In addition, the project will construct new offsite sidewalks and street improvements to improve connectivity along the project frontage on Palm Avenue and the architecture of the buildings have been specifically designed to be compatible with the neighborhood. The proposed project will not physically divide an establish community or have a direct impact on an established community development standards. Therefore, less than significant impacts directly, indirectly, or cumulatively to an established community will occur. No mitigation is required.

<ul> <li>b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?</li> </ul>		

10b. Response: (Source: 2007 Grant Deed (deed restrictions), General Plan 2025, General Plan 2025 Figure LU-10 – Land Use Policy Map, Table LU-5 – Zoning/General Plan Consistency Matrix, Figure LU-7 – Redevelopment Areas, Title 18 – Subdivision Code, Title 7 – Noise Code, Title 17 – Grading Code, Title 20 – Cultural Resources Code, Title 16 – Buildings and Construction and Citywide Design and Sign Guidelines)

Less than Significant Impact. The project is for the development of the site with a self-storage facility. The proposed use would not be contrary with the General Plan 2025 and the Land Use (LU) Objectives LU-67 and LU-68 which focus on revitalizing the Magnolia Center Neighborhood and the preservation of the Center's residential neighborhoods and historic landmarks. The project will be sensitive to the objectives of the General Plan and LU Objectives with its reduction in noise, increase in public safety with the securing of the subject site, and provide traffic relief by providing a closer community service to several neighboring residences currently traveling greater distances for their storage needs. The proposed development assists the General Plan in addressing the reduction of noise, increase in public safety by securing the existing site and alleviating traffic by providing the community with an in-need service thus reducing travel distances of consumers. Special attention has been paid to architectural style and the incorporation of the area's history. Due to the deed restriction imposed on the property by Union Pacific Railroad Company (as a result of the proximity to the active rail line) residential uses are restricted. As a result, this long and narrow infill site lends itself well to a self-storage facility as its highest and best use as it is virtually unusable for any other use. For these reasons, this project will have **less than significant impact** on an applicable land use plan, policy, or regulation directly, indirectly, or cumulatively. No mitigation is required.

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?		$\square$
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### 10c. Response: (Source: Regional Conservation Authority, General Plan 2025 – Figure OS-7 – MSHCP Core and Linkage)

**No Impact.** The project site is located within the Western Riverside County MSHCP. The City of Riverside, as the lead agency for the project, requires that the project comply with the Western Riverside County MSHCP. The MSHCP includes a program for the collection of development mitigation fees, policies for the review of projects in areas where habitat must be conserved and policies for the protection of riparian areas, vernal pools, and narrow endemic plants. It also includes requirements to perform plant, bird, reptile, and mammal surveys in certain areas. The primary intent of the MSHCP is to provide for the conservation of a range of plants and animals and in return, provide take coverage and mitigation for projects throughout

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Western Riverside County to avoid the cost and delays of mitigating biological impacts on a project-by-project basis. It would allow the incidental take (for development purposes) of species and their habitat from development.

The biological field surveys conducted in September 2017 revealed that no nesting birds were present at the time of the survey. However, as a standard practice, a condition of approval will be added specifying that, in the event that vegetation clearing is necessary during the nesting season, a qualified biologist should conduct a preconstruction survey 30 day prior to construction to identify the locations of nests within the areas affected by clearing activities. An exclusionary zone should be established around any active nest. The dimensions of the zone should be determined by a qualified biologist and is dependent on the species of bird detected. This zone should be clearly marked in the field, and construction or clearing should not be conducted within this zone until the biologist determines the nest is no longer active. For these reasons, the project will have **no impact** on any applicable habitat conservation plan or natural community conservations plans. 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. 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?			$\boxtimes$	

### 11a.Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources; GeoMat Soil Investigation Report, APN 226-332-022 and 226-332-023)

**Less than significant.** The proposed project is located in MRZ-4; Mineral Resource Zones as shown in Figure 5.10 of the GP 2025 FPEIR. This indicates that the presence or absence of mineral resources under the site are not known. The California Department of Conservation Division of Mines and Geology emphasizes that this does not necessarily mean that the presence of mineral resources at the site is unlikely; rather just that there is insufficient information available to determine presence or absence.

However, mining operations in the City have not been active for decades. According to the Riverside General Plan EIR, the maximum potential for mineral extraction has occurred; therefore, the proposed project would not result in any loss of availability of any known or unknown mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and surrounding land uses would preclude mining from occurring. Further, the designated land uses for the project site and for the surrounding area are incompatible for mining operations. **Less than significant** impact will occur.

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

#### 11b. Response: (Source: General Plan 2025 Figure – OS-1 – Mineral Resources)

**No Impact.** The General Plan 2025 FPEIR determined that there are no specific areas within the City of Sphere of Influence that have locally-important mineral resource recovery sites and that the implementation of the General Plan 2025 would not significantly preclude the ability to extract state-designated resources. The proposed project is consistent with the General Plan 2025. Therefore, the project will have **no impact** on locally significant mineral resources 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
<b>12.</b> NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			$\boxtimes$	

12a.Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-2 – 2003 Freeway Noise, Figure N-3 – 2003 Railway Noise, Figure N-5 – 2025 Roadway Noise, Figure N-6 – 2025 Freeway Noise, Figure N-7 – 2025 Railroad Noise, Figure N-10 – Noise/Land Use Noise Compatibility Criteria, FPEIR Table 5.11-I – Existing and Future Noise Contour Comparison, Table 5.11-E – Interior and Exterior Noise Standards, Appendix G – Noise Existing Conditions Report, Title 7 – Noise Code, Source: Urban Crossroads Noise Study, July 2017)

**Less than Significant.** A project will normally have a significant effect on the environment related to noise if it will substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of the community in which it is located. The applicable noise standards governing the project site are the noise criteria listed in the Noise Element of the General Plan 2025 and in the City's Municipal Code.

The closest sensitive receptors to the project site are single-family residences located on contiguous parcels north, west and east of the project site. These nearby sensitive uses are near an active railroad line and could potentially be subject to noise-related environmental impacts from construction and operation at the project site. Based on results of the analysis by Urban Crossroads, construction and ongoing on-site operations of the proposed buildings will not exceed allowable levels at residential, commercial, or industrial uses during daytime or nighttime hours with consideration of noise screening provided by proposed walls. Impacts will be less than significant.

**City of Riverside Noise Element.** The City of Riverside has adopted a Noise Element of the General Plan to identify noise conflicts and to reduce existing and potential noise impacts. The Noise Element contains objectives and policies to achieve and maintain noise levels compatible with various types of land uses. To protect City of Riverside residents from potential noise impacts, the Noise Element contains the following objectives:

- N-1 Minimize noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment.
- N-2 Minimize the adverse effects of airport-related noise through proper land use planning.
- N-3 Ensure the viability of March Air Reserve Base/March Inland Port.
- N-4 Minimize ground transportation-related noise impacts.

The Noise/Land Use Noise Compatibility Criteria (Figure N-10) in the City of Riverside General Plan Noise Element provides guidelines to evaluate the land use compatibility of transportation related noise. The compatibility criteria, shown on Exhibit 3-A, provides the City with a planning tool to gauge the compatibility of land uses relative to existing and future exterior noise levels. The Noise/Land Use Noise Compatibility Criteria describes categories of compatibility and not specific noise standards. The Railroad Self Storage will include commercial land use. Based on the land use noise compatibility categories, commercial land use is considered normally acceptable with unmitigated exterior noise levels of less than 60 dBA CNEL, and conditionally acceptable with noise levels approaching 70 dBA CNEL.

Furthermore, the Section 5.11 Noise of the Final Programmatic Environmental Impact Report (EIR) for the City of Riverside General Plan 2025 states that the term "substantial," is not defined in most environmental compliance guidelines. Noise analysis methodology is accurate only to the nearest whole decibel and most people only notice a change in the noise environment when the difference in noise levels are around 3 dB CNEL. An increase or decrease in noise level of at least 5 dBA is required before any noticeable change in community response would be expected. Therefore, a clearly perceptible increase (+5 dB) in noise exposure of sensitive receptors could be considered significant. Therefore, for this noise study, the FICON guidance, which ties specific increases in ambient noise levels to a significance determination based on the without Project ambient noise level at each receiver location, is used in this analysis, consistent with the 5 dBA *clearly perceptible* increase discussed in the General Plan EIR. Further, the FICON guidance results in a more conservative approach than the general 5 dBA *clearly perceptible* increase the acceptable noise level increase for the given ambient noise level condition prior to the contribution of Project-related noise levels.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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#### City of Riverside Municipal Code Noise Ordinance.

Table 7.25.010A (below) establishes the exterior noise standards for the City of Riverside

TABLE 7.25.01	0.A Exterior Noise Standa	rds
Land Use Category	Time Period	Noise Level
Residential	Night (10 p.m. to 7 a.m.)	45 dBA
Residential	Day (7 a.m. to 10 p.m.)	55 dBA
Office/Commercial	Any Time	65 dBA
Industrial	Any Time	70 dBA
Community Support	Any Time	60 dBA
Public Recreation Facility	Any Time	65 dBA
Nonurban	Any Time	70 dBA

Section 7.25.010 of the Noise Code established the exterior sound limits based on the time frame the sound is emitted.

#### Section 7.25.010 Exterior sound level limits.

- A. Unless a variance has been granted as provided in this chapter, it shall be unlawful for any person to cause or allow the creation of any noise which exceeds the following:
  - 1. The exterior noise standard of the applicable land use category, up to five decibels, for a cumulative period of more than thirty minutes in any hour; or
  - 2. The exterior noise standard of the applicable land use category, plus five decibels, for a cumulative period of more than fifteen minutes in any hour; or
  - 3. The exterior noise standard of the applicable land use category, plus ten decibels, for a cumulative period of more than five minutes in any hour; or
  - 4. The exterior noise standard of the applicable land use category, plus fifteen decibels, for the cumulative period of more than one minute in any hour; or
  - 5. The exterior noise standard for the applicable land use category, plus twenty decibels or the maximum measured ambient noise level, for any period of time.
- B. If the measured ambient noise level exceeds that permissible within any of the first four noise limit categories, the allowable noise exposure standard shall be increased in five decibel increments in each category as appropriate to encompass the ambient noise level. In the event the ambient noise level exceeds the fifth noise limit category, the maximum allowable noise level under said category shall be increased to reflect the maximum ambient noise level.

#### **Construction Impacts.**

Short-term noise impacts will be associated with grading and erecting of buildings on site during construction of the proposed project. Construction-related short-term noise levels will be higher than existing ambient noise levels in the project area today, but will cease once construction of the project is completed. The City's Noise Code (Title 7) restricts construction activities to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturdays, and are prohibited on Sundays and federal holidays. Construction activities conducted in compliance with these provisions of the Noise Code are exempt from the established sound level limits set forth in Tables 7.25.010A (Exterior Noise Standards) and 7.30.015 (Interior Noise Standards) (RMC 7.35.020[G]); therefore, construction activities related to the project will not result in the exposure of persons to or generation of noise in excess of established standards and **no impact** will occur.

#### **Operational Impacts.**

Residential uses are located adjacent to the project site. Noise levels, due to the operation of the proposed self-storage will result from vehicle activity at parking and docking areas and along the drive aisles. To fully analyze existing railroad-related noise levels in the project study area and the project operational activity (stationary-source) noise levels, Urban Crossroads, Inc. developed a noise prediction model using the CadnaA (Computer Aided Noise Abatement) computer program. CadnaA can analyze the noise level of multiple types of noise sources and calculates the noise levels at any location using the spatially accurate project site plan. The program can analyze the noise propagation of multiple types of noise sources and calculate the attenuation and reflection from topography, buildings, and multiple barriers.

To demonstrate compliance with local noise standards, the project-only operational noise levels are evaluated against the City of Riverside exterior noise level standards. Table 8-2 and 8-3 shows the operational noise levels associated with the project

ISSUES (AND SUPPORTING	Potentially Significant	Less Than Significant	Less Than Significant
INFORMATION SOURCES):	Impact	With Mitigation	Impact
		Incorporated	

will satisfy the 55 dBA  $L_{50}$  daytime exterior noise level standards at the nearby sensitive residential receivers in the City of Riverside.

TABLE 8-	-2: PROJECT OPERATIONAL NO	ISE LEVELS (dBA)
Receiver Location <sup>1</sup>	Noise Sources <sup>2</sup>	Operational Noise Levels (dBA L <sub>5,0</sub> ) <sup>3</sup>
2000000	Storage (Roll-Up Doors) Activity	45.5
	Air Conditioning Unit	27.2
R1	Parking Lot Vehicle Movements	38.2
	RV Storage Activity	53.5
	Combined Noise Level:	54.3
	Storage (Roll-Up Doors) Activity	40.7
	Air Conditioning Unit	14.4
R2	Parking Lot Vehicle Movements	21.6
	RV Storage Activity	45.3
	Combined Noise Level:	46.6
	Storage (Roll-Up Doors) Activity	40.7
	Air Conditioning Unit	12.2
R3	Parking Lot Vehicle Movements	23.2
	RV Storage Activity	33.8
	Combined Noise Level:	41.6
	Storage (Roll-Up Doors) Activity	50.9
	Air Conditioning Unit	26.6
R4	Parking Lot Vehicle Movements	32.7
	RV Storage Activity	31.1
	Combined Noise Level:	51.0
	Storage (Roll-Up Doors) Activity	34.7
	Air Conditioning Unit	23.9
R5	Parking Lot Vehicle Movements	18.5
	RV Storage Activity	47.7
	Combined Noise Level:	47.9
	Storage (Roll-Up Doors) Activity	22.4
	Air Conditioning Unit	12.9
R6	Parking Lot Vehicle Movements	6.4
	RV Storage Activity	39.2
	Combined Noise Level:	39.3
	Storage (Roll-Up Doors) Activity	22.2
	Air Conditioning Unit	26.5
R7	Parking Lot Vehicle Movements	5.9
	RV Storage Activity	33.5
	Combined Noise Level:	34.6
	Storage (Roll-Up Doors) Activity	39.0
R8	Air Conditioning Unit	21.5
Кð	Parking Lot Vehicle Movements	22.5
	RV Storage Activity	45.9

No Impact

#### **ISSUES (AND SUPPORTING INFORMATION SOURCES):**

Less Than Less Than Significant Significant With Impact Mitigation Incorporated

No Impact

TAB	LE 8-3: OPERATIONAL	NOISE LEVEL COMPL	JANCE
Receiver	Noise Level at Receiver	Noise Level Standards	Threshold
Number <sub>1</sub>	Locations (dBA L <sub>5,0</sub> )2	(dBA L5, 0)3	Exceeded? <sub>4</sub>
R1	54.3	55	No
R2	46.6	55	No
R3	41.6	55	No
R4	51.0	55	No
R5	47.9	55	No
R6	39.3	55	No
R7	34.6	55	No
R8	46.7	55	No
R9	41.9	55	No

Project operational noise levels as shown on Table 8-2.

3 Noise standards as shown on Table 3-1.

4. Do the estimated project stationary source noise levels exceed the noise standards on the affected land

uses? "Daytime" = 7:00 a.m. to 10:00 p.m.

Table 8.2 (On-Site Operational Noise Impacts) summarizes noise levels that receptors could be exposed to in community noise equivalent level (CNEL). CNEL is the average equivalent A-weighted sound level during a 24-hour day, objected after addition of five decibels to sound levels in the evening from 7:00 PM to 10:00 PM and after addition of ten decibels to sound levels in the night from 10:00 PM to 7:00 AM. Based on results of the model, on-site operations of the proposed buildings will not exceed allowable levels at residential uses during daytime or nighttime hours with consideration of noise screening provided by proposed walls. Impacts will be less than significant.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne poise levels?		$\square$	
vibration or groundborne noise levels?			

#### 12b. Response: (Source: General Plan Figure N-1 – 2003 Roadway Noise, Figure N-5 – 2025 roadway Noise, FPEIR Table 5.11G)

Less than Significant. The mechanical excavation activities although short term, are the most common source of groundborne noise and vibration that could affect occupants of neighboring uses. This project was assessed for potential noise and ground borne vibration impacts related to noise land use compatibility and construction related noise per GP 2025 FPEIR, Table 5.11-G. Vibration Source Levels for Construction Equipment, onsite stationary noise sources, and vehicular related noise.

#### **Construction Impacts.**

As grading activities are temporary and limited, the project will cause a less than significant exposure of persons to or generation of excessive ground borne vibration or ground borne noise levels.

#### **Operational Impacts.**

This project is not expected to generate or be exposed to long term vibration impacts during operation of the proposed use or during grading activities as no blasting or pile driving is foreseeable in conjunction with development of this project.

As provided in the project design plan, construction of the proposed self-storage establishment does not involve or necessitate demolition, substantial groundwork, and other activities having the potential to generate excessive vibration or groundborne noise. As a result the project direct, indirect, and cumulative impacts to this criterion would be expected to be less than significant.

INFORMATION SOURCES): Impact With Impact Mitigation Incorporated
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c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
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#### 12c. Response: (Source: Urban Crossroads Noise Study, July 2017)

Less than Significant. The primary existing noise sources in the project area is the railroad and transportation facilities. The railroad on the southern property line and vehicular traffic along Dewey Avenue to the south and Palm Avenue to the east and the other local streets is the dominant source of ambient noise. Although individual activity associated with the proposed project may generate additional noise, the proposed six-foot-tall solid walls and the storage structures themselves (the rear wall of the northern buildings) will act as sound barriers which will prevent noise associated with the project site from impacting the single-family residences adjacent to the project site.

The CadnaA noise prediction model was used to calculate the potential reflection of railroad noise off the southern building façade of the project buildings to the homes located south of the adjacent railroad tracks, fronting Dewey Avenue. The Federal Highway Administration (FHWA) has shown that the reflection from barriers and buildings does not substantially increase noise levels. If all the noise striking the project building were reflected back to the southern side of the railroad tracks, the increase would be theoretically limited to 3 dBA (i.e., two combined noise sources of equal level result in a 3 dBA increase).

Further, not all the acoustical energy is reflected to the other side. Some of the energy would go over the building, some is reflected to points other than the project on the opposite side, some is scattered by ground coverings (e.g., grass and other plants), and some is blocked by the train itself. Additionally, some of the reflected energy is lost due to the longer path that the noise must travel. FHWA measurements made to quantify this reflective increase have never shown an increase of greater than 1-2 dBA; an increase that is not perceptible to the average human ear, as determined by the U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. Highway Traffic Noise Analysis and Abatement Policy and Guidance. June, 1995. This noise study shows that the increase in exterior noise levels at homes fronting Dewey Avenue, due to reflected railroad noise, will range from 0.8 to 1.3 dBA CNEL. Consistent with the FHWA findings on reflected noise levels, an increase of up to 1.3 dBA CNEL is not perceptible to the average human ear, and therefore, no exterior noise abatement is required to reduce the potential reflective effects of the project building.

Table 6-1 presents a summary of exterior noise level impacts at the outdoor living areas (backyards) of the sensitive receiver locations. The calculated railroad activity noise levels experienced at receiver locations R1 to R4 ranged from 68.6 to 73.0 dBA CNEL without the project. Based on the City of Riverside General Plan Noise Element *Noise/Land Use Noise Compatibility Criteria*, previously shown on Exhibit 3-A, the exterior noise levels for the residential homes at receiver locations R1 to R4 are shown to approach *conditionally unacceptable* levels for single-family residential land use.

TABLE 6-1: PROJECT STRUCTURE ATTENUATION (CNEL)						
Receiver Location	Without Project Noise	With Project Noise	Project Structure			
Receiver Location	Levels (dBA CNEL)2	Levels (dBA CNEL)3	Attenuation (dBA CNEL) <sub>4</sub>			
R1	73.0	69.6	3.4			
R2	68.6	58.6	10.0			
R3	72.8	58.3	14.5			
R4	72.3	64.2	8.1			
1. Receiver locations as sho	own on Exhibit 5-A.					

Receiver locations as shown on Exhibit 5-A.
 24-hour noise levels without the project structures.

24-hour noise levels without the project structures.
 24-hour noise levels with the project structures.

4. Project structure noise barrier attenuation based on the without project noise levels minus the with project noise levels.

With the barrier attenuation provided by the project structures, the exterior noise levels at receiver locations R1 to R4 range from 58.3 to 69.6 dBA CNEL, as shown on Table 6-1. By comparing the without and with project noise levels, the attenuation provided by the project structures can be calculated. This analysis shows that the project structures will provide additional railroad noise level attenuation ranging from 3.4 to 14.5 dBA CNEL. The proposed Railroad Self Storage is shown to reduce the perceived existing exterior noise levels by more than half at some receiver locations. With the development of the project, the existing conditionally unacceptable exterior noise levels will be reduced to those of normally unacceptable and conditionally acceptable residential land use per the City of Riverside General Plan Noise Element Noise/Land Use Noise Compatibility

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Criteria. Further, as determined by the noise analysis completed by Urban Crossroads, with the proposed walls and structures, the difference between the combined project and ambient noise levels describe the project noise level contributions is negligible. Noise levels that would be experienced at receiver locations when unmitigated project-source noise is added to the ambient daytime.

To describe the project operational noise level contributions to the existing ambient noise environment, the project operational noise levels were combined with the existing ambient noise levels measurements at the off-site receiver locations potentially impacted by project operational noise sources. Since the units used to measure noise, decibels (dB), are logarithmic units, the project-operational and existing ambient noise levels cannot be combined using standard arithmetic equations. Instead, they must be logarithmically added using the following base equation:

#### $SPL_{Total} = 10log_{10}[10_{SPL1/10} + 10_{SPL2/10} + \dots 10_{SPLn/10}]$

Where "SPL1," "SPL2," etc. are equal to the sound pressure levels being combined, or in this case, the project-operational and existing ambient noise levels. The difference between the combined project and ambient noise levels describe the project noise level contributions. Noise levels that would be experienced at receiver locations when unmitigated project-source noise is added to the ambient daytime conditions are presented on Table 8-4.

TABLE 8-4: PROJECT OPERATIONAL NOISE CONTRIBUTION							
Receiver Location <sub>1</sub>	Total Project Operational Noise Level2	Measurement Location <sub>3</sub>	Reference Ambient Noise Levels4	Combined Project and Ambient5	Project Contribution <sub>6</sub>	Significant?	
R1	54.3	L1	52.7	56.6	3.9	No	
R2	46.6	L1	52.7	53.7	1.0	No	
R3	41.6	L1	52.7	53.0	0.3	No	
R4	51.0	L1	52.7	55.0	2.3	No	
R5	47.9	L2	52.7	54.0	1.3	No	
R6	39.3	L3	56.1	56.2	0.1	No	
R7	34.6	L3	56.1	56.1	0.0	No	
R8	46.7	L1	52.7	53.7	1.0	No	
R9	41.9	L1	52.7	53.0	0.3	No	

1. See Exhibit 8-A for the sensitive receiver locations.

2. Total project operational noise levels as shown on Table 8-3.

3. Ambient noise level measurement locations as shown on Exhibit 5-A as measured by Urban Crossroads, Inc.

4. Observed daytime ambient noise levels as shown on Table 5-1.

5. Represents the combined ambient conditions plus the project activities.

6. The noise level increase expected with the addition of the proposed project activities.

As shown in Table 8-4, above, the project will contribute operational noise level increases ranging 0.3 to 3.9 dBA  $L_{5,0}$ . The project related noise level increases will range from barely perceptible to below perceptible noise level increases over existing ambient conditions.

The Federal Interagency Committee on Noise (FICON) has developed guidance to be used for the assessment of projectgenerated increases in noise levels that consider the existing ambient noise level environment. The FICON recommendations are based on studies that relate aircraft noise levels to the percentage of persons highly annoyed by aircraft noise. Although the FICON recommendations were specifically developed to assess aircraft noise impacts, these recommendations are often used in environmental noise impact assessments involving the use of cumulative noise exposure metrics, such as the average-daily noise level (i.e., CNEL), logarithmic average (Leq), or median noise level ( $L_{5,0}$ ) (FICON, Federal Agency Review of Selected Airport Noise Analysis Issues, August 1992).

Per FICON guidance, if the ambient noise environment is quiet (<60 dBA  $L_{5,0}$ ) and the new noise source generates a readily perceptible 5 dBA  $L_{5,0}$  or greater project-related noise level increase, then the increase would be considered a significant impact. As shown on Table 8-4 of the Noise Study, the project-related operational noise level increases will approach 3.9 dBA  $L_{5,0}$  and when the existing ambient noise level is below 60 dBA  $L_{5,0}$ .

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

As stated, the project operational noise level increases satisfy the 5 dBA  $L_{5\ 0}$  increase threshold of FICON when ambient noise levels are below 60 dBA  $L_{5,0}$ , thereby resulting in a less than significant long-term operational noise level impact. Therefore, as a result of the projects design and walls, the projects operational noise levels will be effectively overshadowed by existing rail activities and traffic noise on Palm Avenue and Dewey Avenue. No mitigation is required.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			$\square$	
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#### 12d. Response: (Source: Urban Crossroads Noise Study, July 2017)

Less than Significant. Implementation of the proposed project would include construction activities that would result in a temporary increase in ambient noise levels in the project site vicinity above levels existing without the project. The City's Noise Code (Title 7) restricts construction activities to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, 8:00 a.m. to 5:00 p.m. on Saturdays, and are prohibited on Sundays and federal holidays. Construction activities conducted in compliance with these provisions of the Noise Code are exempt from the established sound level limits set forth in Tables 7.25.010A (Exterior Noise Standards) and 7.30.015 (Interior Noise Standards) (RMC 7.35.020[G]); therefore, construction activities related to the project will not result in the exposure of persons to or generation of noise in excess of established standards and no impact will occur. Compliance with the hours specified in the City's Municipal Code regarding construction activities would help reduce construction noise impacts on adjacent noise-sensitive land uses when construction occurs near the project boundaries.

The completed analysis of the exterior noise levels (Table 8-4, above) without and with the project buildings at homes located south of Dewey Avenue, represented by receiver locations R5 to R7, will range from 73.8 to 74.0dBA CNEL without the project, and 74.6 to 75.2 dBA CNEL with the project. This shows that the increase due to reflected railroad noise will range from 0.8 to 1.3 dBA CNEL. A minimum increase of 3.0 dBA CNEL is required to be perceptible to the human ear; the 1.3 dBA CNEL, as proposed, is not perceptible to the average human ear.

A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project is **less than significant**. As shown by the analysis, it is expected that the project noise levels will be effectively overshadowed by rail activities and traffic noise on Palm Avenue and Arch Way. 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 expose people residing or working in the project area to excessive noise levels?				
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### 12e. Response: (Sources: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas; General Plan 2025 Figure N-8 – Riverside and Flabob Airport Noise Contours; Noise Analysis, Urban Crossroads July 2017).

**Less Than Significant Impact.** The project site is located approximately 1.4 miles east of the Riverside Municipal Airport and the project site is outside all noise contours for the Riverside Municipal Airport. In addition, no residential component is associated with the project. Therefore, the project would not expose people residing or working in the project area to excessive noise levels from a public airport or public use airport. The project would have a **less than significant** impact related to airport noise 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
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				$\boxtimes$

12f. Response: (Source: General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas).

**No Impact.** The project site is not within the vicinity of a private airstrip. Therefore, it would have **no impact** related to private airstrips 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. POPULATION AND HOUSING. Would the project:				
a. Induce substantial 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)?			$\boxtimes$	

#### 13a. Response: (Source: General Plan 2025 Table LU-3 – Land Use Designations, FPEIR Section 5.12-Population and Housing, FPEIR Table 5.12-A – SCAG Population and Households Forecast, Table 5.12-B – General Plan Population and Employment Projections–2025, Table 5.12-C – 2025 General Plan and SCAG Comparisons, Table 5.12-D – General Plan Housing Projections 2025, Capital Improvement Program and SCAG's RCP and RTP; ALUC letter, May 19, 2017)

The project involves the construction of approximately 97,435 square feet of new self-storage facility that may induce population growth through the provision of new employment opportunities within the City. However, as designed, the project is consistent with the General Plan Land Use and Zoning Designation. The General Plan 2025 Final PEIR determined that Citywide, future development anticipated under the General Plan 2025 Typical Growth scenario would not have significant population growth impacts. Because the proposed project is consistent with the General Plan 2025, typical growth scenario and population growth impacts were previously evaluated in the General Plan 2025 FPEIR the project does not result in new impacts beyond those previously evaluated in the General Plan 2025 FPEIR; therefore, the impacts will be **less than significant** both directly and indirectly. No mitigation is required.

b.	Displace substantial numbers of existing housing, necessitating		$\square$
	the construction of replacement housing elsewhere?		

#### 13b. Response: (Source: Project, Google imaging)

**No Impact.** The project does not displace existing housing, necessitating the construction of replacement housing elsewhere because the project site is proposed on vacant land that has no existing housing that will be removed or affected by the proposed project. Therefore, there will be **no impact** on existing housing either directly, indirectly or cumulatively.

c.	Displace substantial numbers of people, necessitating the		$\square$
	construction of replacement housing elsewhere?		

#### 13c. Response: (Source: Project, Google imaging)

**No Impact.** The project will not displace people, necessitating the construction of replacement housing elsewhere because the project site is proposed on vacant land that has no existing housing or residents that will be removed or affected by the proposed project. Therefore, this project will have **no impact** on people, necessitating the need for replacement housing either directly, indirectly or cumulatively.

	SUES (AND SUPPORTING FORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14.	<b>PUBLIC SERVICES.</b> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	a. Fire protection?				$\boxtimes$

### 14a. Response: (Source: FPEIR Table 5.13-B – Fire Station Locations, Table 5.13-C – Riverside Fire Department Statistics and Ordinance 5948 § 1)

**No Impact.** The project is in an urbanized area and consists of the construction and operation of a 97,435-square-foot selfstorage facility. Adequate fire facilities and services are provided by Station 3 located at 6395 Riverside Ave, Riverside, CA 92506 to serve this project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be **no impact** on the demand for additional fire facilities or services either directly, indirectly, or cumulatively.

b. Police protection?				$\square$
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#### 14b. Response: (Source: General Plan 2025 Figure PS-8 – Neighborhood Policing Centers)

**No Impact.** The project is in an urbanized area and consists of the construction and operation of a 97,435-square-foot self-storage facility. The project may require police services during construction and operation of the proposed self-storage. Adequate police facilities and services are provided by Magnolia Neighborhood Policing Center, located at 10540-B Magnolia Avenue, to serve this project.

As with all development within the City, the project applicant shall pay applicable development impact fees to support the provision of police services. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there will be **no impact** on the demand for additional police facilities of services either directly, indirectly or cumulatively.

c. Schools?
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# 14c. Response: (Source: FPEIR Figure 5.13-2 – RUSD Boundaries, Table 5.13-D – RUSD, Figure 5.13-3 – AUSD Boundaries, Table 5.13-E – AUSD, Table 5.13-G – Student Generation for RUSD and AUSD By Education Level, and Figure 5.13-4 – Other School District Boundaries)

**No Impact.** The proposed project is within the boundaries of the Riverside Unified School District. Since the project proposes a commercial storage use rather than residential uses, no additional housing will be generated such that the number of school-aged children would increase as a result of the proposed project. The project applicant shall pay school development impact fees, as required pursuant to Senate Bill 50 and California Government Code, Section 65995. Through compliance with Senate Bill 50 and California Government Code, Section 65995, no impact to schools will occur.

d.	Parks?				

# 14d. 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 proposes a commercial storage use that will not involve the addition of any housing units that would permanently increase the population. The City's adopted standard for developed park acreage of 3 acres per 1,000 residents will not be adversely affected. Additionally, the proposed project site is not located in an area of the City identified to have a

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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parkland shortage. Therefore, no significant increase in demand on park uses or recreational facilities will occur. In accordance with the City's Parks, Recreation, and Community Services-Park Planning Department, the applicant will make payment of all applicable Park Development Impact Fees (local, aquatic, regional/reserve, and trail fees) for privately developed areas. With the payment of applicable development impact fees, the proposed project will have **no impact** on the demand for additional park facilities or services.

e. Other public facilities?				$\square$	
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# 14e. 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, Table 5.13-H – Riverside Public Library Service Standards)

**No Impact.** The project would create self-storage facilities within an urbanized area. Adequate public facilities and services, including libraries and community centers, are provided in the Magnolia Center Neighborhood to serve this project. In addition, with implementation of General Plan 2025 policies, compliance with existing codes and standards, and through Park and Recreation and Community Services and Library practices, there will be **no impact** on the demand for additional public facilities or services either directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li><b>15. RECREATION.</b> <ul> <li>a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or</li> </ul> </li> </ul>				
be accelerated?				

#### 15a. 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.** The proposed project consists of a commercial storage use that will not involve the addition of any housing units that would permanently increase the population. The City's adopted standard for developed park acreage of 3 acres per 1,000 residents will not be adversely affected. Additionally, the proposed project site is not located in an area of the City identified to have a parkland shortage. Therefore, no significant increase in demand on park uses or recreational facilities will occur. In accordance with the City's Parks, Recreation, and Community Services-Park Planning Department, the applicant will make payment of all applicable Park Development Impact Fees (local, aquatic, regional/reserve, and trail fees) for privately developed areas. Since the proposed project does not include any uses that would increase the use of existing neighborhood and regional parks such that substantial physical deterioration of the facilities would occur or be accelerated, this project will have **no impact** on existing neighborhood and regional parks.

b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might		$\square$	
	have an adverse physical effect on the environment?			

#### 15b. Response: (Source: Project Plans)

**Less Than Significant Impact.** The project will not include new recreational facilities or require the construction or expansion of recreational facilities. Additionally, the project proposes a light industrial use rather than a residential use and will not involve the addition of any housing units that would permanently increase the population. Therefore, the construction or expansion of recreational facilities in the absence of a population increase is not necessary; there will be **less than significant impact** directly, indirectly or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li><b>16.</b> TRANSPORTATION/TRAFFIC. Would the project result in:         <ul> <li>a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and</li> </ul> </li> </ul>				

#### 16a. Response: (Source: General Plan 2025 Circulation and Community Mobility Element, Project Plans):

**Less Than Significant Impact.** The project was designed to comply with the City requirements relative to access plans and to avoid potential impacts to the adjacent roadway due to the proximity to the rail crossing and the planned Quiet Zone implementation. The project consists of five buildings totaling approximately 97,435 square feet. The project site is located on is located north of Union Pacific Railroad Company rail lines and west of Palm Avenue and east of Arch Way. Access to the project is provided off Palm Avenue. Emergency access from Arch Way is proposed through a sliding Knox box controlled wrought-iron fence. The following off-site improvements will be constructed on Palm Avenue and Arch Way:

Palm Ave

- Realign existing curb and gutter, sidewalk, guy wire, storm drain catch basin, large palm tree and portions of street paving along the frontage of Palm Ave Self-storage
- Realignment to tie into the City of Riverside's future "Quiet Zone" improvement plan for the railroad crossing at Palm Avenue south of Palm Ave Self-Storage.
- Add an additional driveway approach for main entrance to Palm Avenue self-storage
- Replace driveway approach of adjacent single-family residence directly north of the project to tie into the new driveway approach for Palm Avenue self-storage facility.

#### Arch Way

- Remove temporary pavement and asphalt concrete dike (curb) on east half of the cul-de-sac
- Replace with permanent designed cul-de-sac
  - Asphalt concrete pavement
  - Curb and gutter
  - Drive way approach for Palm Avenue Self-storage facility

As a result of the implementation of these proposed offsite infrastructure and road improvement measures, the project contributes to the City requirements relative to access plans and to avoid potential impacts to the adjacent roadway due to the proximity to the rail crossing and the planned Quiet Zone implementation. Therefore, the project does not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. Less than significant impact. No mitigation is required.

	IES (AND SUPPORTING DRMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			$\boxtimes$	

#### 16b. Response: (Source: General Plan 2025 Circulation and Community Mobility Element, Project Plans)

Less Than Significant Impact. The project was designed to comply with the City requirements relative to access plans and to avoid potential impacts to the adjacent roadway due to the proximity to the rail crossing and the planned Quiet Zone implementation.

Off-site improvements to Arch Way and Palm Avenue will be required for both the west and east ends of the project as described above, in Section 16a.

The project will not conflict with an applicable plan, ordinance or policy. The "2011 Riverside County Congestion Management Program" includes guidelines to more directly link land use, transportation, and air quality, thereby prompting reasonable growth management programs will effectively utilize new transportation funds, alleviate traffic congestion and related impacts, and improve air quality. These guidelines establish a system of state highways and principal arterial roadways designated by the Riverside County Transportation Commission (RCTC). The adopted minimum Level of Service (LOS) threshold for CMP state highways and principal arterial roadways is LOS E, unless the intersection or segment had a lower LOS (LOS F) in 1991; these facilities are exempt from CMP deficiency plan requirements. With the implementation of the conditions, impacts would be **less than significant**. Mitigation is not required

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			$\boxtimes$	
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# 16c. Response: (Source: Airport Land Use Commission (ALUC) Development Review File No.: ZAP1085R117, General Plan 2025 Figure PS-6 – Airport Safety Zones and Influence Areas, RCALUCP and March Air Reserve Base/March Inland Port Comprehensive Land Use Plan, 1999).

Less Than Significant Impact. On May 11, 2017, the project, File Number: ZAP1085R117, was reviewed by the Riverside County Airport Land Use Commission (ALUC) and determined the project is consistent with the compatibility zones as well as in compliance with the land use standards in the RCALUCP, subject to conditions of approval. Because the project has been found to be consistent with the RCALUCP. Therefore, impacts would be less than significant. Mitigation is not required.

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

#### 16d. Response: (Source: General Plan 2025 and Project Site Plans)

**Less Than Significant Impact.** Vehicular access to the project site would be provided via a driveway on Palm Avenue. Vehicular traffic to and from the project site would utilize the existing network of regional and local roadways that serve the project site area. The proposed project would not introduce any new roadways or introduce a land use that would conflict with existing urban land uses in the surrounding area.

Consistent with Compliance Measure TRA-1 of the City of Riverside, Traffic Engineering Section of the Public Works Department a standard condition of approval will be placed on the project requiring the project site plans, including improvements on Palm Avenue and Arch Way, curb cuts, ingress, egress, and other streetscape changes, be reviewed and approved prior to the issuance of a grading permit for the project.

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

Therefore, the proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). Impacts related to hazardous design features would be **less than significant** and no mitigation is required.

e. Result in inadequate emergency access?	e. Result in inadequate emergency access?			$\square$	
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### 16e. Response: (Source: California Department of Transportation Highway Design Manual, Municipal Code, and Fire Code)

**Less Than Significant Impact.** Direct access for emergency vehicles would be provided from Palm Avenue and Arch Way. Access to the project site would remain open during construction, and project site access would be maintained. Therefore, implementation of the proposed project would not result in inadequate emergency access, resulting in a **less than significant impact** and no mitigation is required.

f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise		$\boxtimes$	
decrease the performance or safety of such facilities?			

### 16g. Response: (Source: FPEIR, General Plan 2025 Land Use and Urban Design, Circulation and Community Mobility and Education Elements, Bicycle Master Plan, School Safety Program – Walk Safe! – Drive Safe!)

Less than significant. The project site is served by the Riverside Transit Agency. The nearest stop is located approximately 1,000 feet to the east of the project site, on Brockton Avenue. The proposed project will not require, permanently or temporarily, the relocation or closure of any RTA or other agency transit stops. The project will provide bicycle parking facilities in compliance with the California Green Building Code. Along Palm Avenue pedestrian infrastructure will be served by the realignment of the existing curb and gutter, sidewalk, guy wire, storm drain catch basin, large palm tree and portions of street paving along the frontage of Palm Avenue. Along Arch Way new curb, gutter and sidewalk will be installed along the project frontage. As a result, the proposed project as designed is not in conflict with adopted policies, plans or programs supporting alternative transportation. Therefore, the proposed project impacts related to adopted policies, plans or programs supporting alternative transportation are **less than significant** directly, indirectly and cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentia Significa Impac	ant Significant	Less Than Significant Impact	No Impact
17. TRIBAL CULTURAL RESOURCES: Wou a substantial change in the significance of trib defined in Public Resources Code section 210 feature, place, cultural landscape that is geogr terms of the size and scope of the landscape, s object with cultural value to the California Na and that is:	l cultural resources, 4 as either a site, phically defined in cred place, or			
a. Listed or eligible for listing in the Californ Historical Resources, or in a local register resources as defined in Public Resources C 5020.1(k)?	of historical	$\boxtimes$		

### 17a. Response: (Source: Phase I Historical/Archaeological Resources Survey: Palm Ave Storage Project, City of Riverside, Riverside County, California, CRM TECH, May 8, 2017)

The results of the EIC records search, and site visit indicate that there are no eligible or listed archaeological resources within or near the project area.

On June 13, 2017, the City sent project notification letters to nine California Native American tribes that requested consultation pursuant to AB 52. The letter provided a brief description of the proposed project and its location, the lead agency contact information, and a notification that the tribe has 30 days to request consultation. The 30-day response period concluded on July 12, 2017.

The Rincon Band of Luiseño Indians, the San Manuel Band of Mission Indians, and the Soboba Band of Luiseño Indians requested consultation pursuant to AB 52. Consultation with the above mentioned tribes were held in July and August of 2017. Tribes did not identify Tribal Cultural Resources (TCRs) in the project area, but expressed a general concern for unknown/subsurface cultural resources in the project area that could be affected/discovered during ground disturbing construction activities. Consultation with the above noted Native American Tribes has closed with the implementation of **Mitigation Measures CUL-**1 through 4 will be implemented to reduce impacts of the project to less than significant with the implementation fo **Mitigation Measures CUL – 1 through 4**.

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

#### 17b. Response: (Source: Phase I Historical/Archaeological Resources Survey: Palm Ave Storage Project, City of Riverside, Riverside County, California, CRM TECH, May 8, 2017)

Please see the response to 17a., above. No TCRs or known eligible or listed archaeological resources have been identified on the project site. Impacts to unknown resources would be less than significant with the implementation of Mitigation Measures CUL-1 through 4.

	JES (AND SUPPORTING DRMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
18.	UTILITIES AND SYSTEM SERVICES. Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			$\boxtimes$	

18a. Response: (Source: General Plan 2025 Figure PF-2 – Sewer Facilities Map, FPEIR Figure 5.16-5 – Sewer Service Areas, Table 5.16-K – Estimated Future Wastewater Generation for the City of Riverside's Sewer Service Area, Figure 5.8-1 – Watersheds, Wastewater Integrated Master Plan and Certified EIR)

Less Than Significant Impact. The project is within the boundaries of the Santa Ana Regional Water Quality Control Board (RWQCB) and subject to the Riverside County Drainage Area Management Plan. The proposed project will connect to existing wastewater collection and conveyance facilities owned and operated by the City via sewer laterals from the project site, and wastewater from the project site and vicinity will be transported to the Riverside Regional Water Quality Control Plant. If an existing sewer lateral will be utilized, video inspection prior to connection will be required in accordance with the City's Municipal Separate Sewer Permit (MS4) as part of the City's Development Review Process through the Public Works Department.

All new development is required to comply with all provisions of the NPDES program and the City's Municipal Separate Sewer Permit (MS4), as enforced by the Regional Water Quality Control Board (RWQCB). Therefore, the proposed project would not exceed applicable wastewater treatment requirements of the RWQCB with respect to discharges to the sewer system or stormwater system within the City. Because the proposed project is required to adhere to the above regulations related to wastewater treatment the project will have a **less than significant** impact.

b.	Require or result in the construction of new water or		
	wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		$\boxtimes$

18b. Response: (Source: General Plan 2025 Table PF-1 – RPU Projected Domestic Water Supply (AC-FT/YR), Table PF-2 – RPU Projected Water Demand, RPU, 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, Figure 5.16-4 – Water Facilities and Figure 5.16-6 – Sewer Infrastructure and Wastewater Integrated Master Plan and Certified EIR)

**No Impact.** The project will not result in the construction of new or expanded water or wastewater treatment facilities. The project is consistent with the Typical Growth Scenario of the General Plan 2025 wherein future water and wastewater generation was determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I, 5.16-J and 5.16-K of the General Plan 2025 Final PEIR). Therefore, the project will have **no impact** resulting in the construction of new water or wastewater treatment facilities or the expansion of existing facilities directly, indirectly, or cumulatively.

draina	e or result in the construction of new storm water e facilities or expansion of existing facilities, the ction of which could cause significant environmental			$\boxtimes$	
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#### 18c. Response: (Source: FPEIR Figure 5.16-2 – Drainage Facilities)

Less Than Significant Impact. The proposed project will result in an increase in impervious surface areas. The project proposes an increase of 109,771 square feet (2.52 acre) in impervious surface area that will generate increased storm water flows with potential to impact drainage facilities and require the provision of additional facilities. This impervious area will generate increased storm water flows with potential to affect drainage facilities and require the provision of additional facilities. This impervious area will generate increased storm water flows with potential to affect drainage facilities and require the provision of additional facilities. However, the Subdivision Code (Title 18, Section 18.48.020) requires drainage fees to be paid to the City for new construction. Fees are transferred into a drainage facilities fund that is maintained by Riverside County Flood Control and Water Conservation District. This section also complies with the California Government Code (Section 66483), which provides for the payment of fees for construction of drainage facilities. Fees are required to be paid as part of the conditions of

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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approval/waiver for filing of a final map or parcel map. General Plan 2025 Policies PF 4.1 and PF 4.3 require the City to continue to routinely monitor its storm drain system and to fund and improve those systems as identified in the City's Capital Improvement Plan. Implementation of these policies will ensure that the City is adequately served by drainage systems. The General Plan 2025 also includes policies and programs that will minimize the environmental effects of the development of such facilities. Therefore, the project will have a **less than significant** impact on existing storm water drainage facilities and would not require the expansion of existing facilities directly, indirectly, or cumulatively

d. Have sufficient water supplies available to serve the project		
from existing entitlements and resources, or are new or		$\bowtie$
expanded entitlements needed?		

18d. Response: (Source: FPEIR Figure 5.16-3 – Water Service Areas, Figure 5.16-4 – Water Facilities, Table 5.16-E – RPU Projected Domestic Water Supply AC-FT/YR, Table 5.16-F – Projected Water Demand, Table 5.16-G – General Plan Projected Water Demand for RPU including Water Reliability for 2025)

**No Impact.** The project will not exceed expected water supplies. The project is consistent with the General Plan 2025 Typical Growth Scenario where future water supplies were determined to be adequate (see Tables 5.16-E, 5.16-F, 5.16-G, 5.16-H, 5.16-I and 5.16-J of the General Plan 2025 Final PEIR). Therefore, the project will have **no impact** resulting in insufficient water supplies either directly, indirectly, or cumulatively.

e. 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?				$\boxtimes$
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#### 18e. Response: (Source: 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 Wastewater Integrated Master Plan and Certified EIR)

**No Impact.** The project will not exceed wastewater treatment requirements of the RWQCB. The project is consistent with the General Plan 2025 Typical Growth Scenario wherein future wastewater generation was determined to be adequate (see Table 5.16-K of the General Plan 2025 Final PEIR). Further, the current Wastewater Treatment Master Plan anticipates and provides for this type of project. Therefore, **no impact** related to wastewater treatment directly, indirectly, or cumulatively will occur.

f.	Be served by a landfill with sufficient permitted capacity to		$\square$
	accommodate the project's solid waste disposal needs?		

### 18f. Response: (Source: FPEIR Table 5.16-A – Existing Landfills and Table 5.16-M – Estimated Future Solid Waste Generation from the Planning Area)

**No Impact:** The project is consistent with the General Plan 2025 Typical Build-out Project level where future landfill capacity was determined to be adequate (see Tables 5.16-A and 5.16-M of the General Plan 2025 Final PEIR). Therefore, **no impact** to landfill capacity will occur directly, indirectly or cumulatively.

g.	Comply with federal, state, and local statutes and regulations related to solid waste?		$\square$
	Telated to Solid Waste.		

#### 18g. Response: (Source: California Integrated Waste Management Board 2002 Landfill Facility Compliance Study)

**No Impact.** The California Integrated Waste Management Act under the Public Resource Code requires that local jurisdictions divert at least 50 percent of all solid waste generated by January 1, 2000. The City is currently achieving a 60 percent diversion rate, well above state requirements. In addition, the California Green Building Code requires all developments to divert 50 percent of non-hazardous construction and demolition debris for all projects and all excavated soil and land clearing debris for all non-residential projects beginning January 1, 2011. The proposed project must comply with the City's waste disposal

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

requirements as well as the California Green Building Code. For these reasons, the project would not conflict with any federal, state, or local regulations related to solid waste. Therefore, **no impact** related to solid waste statutes will occur directly, indirectly, or cumulatively.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<ul> <li>19. MANDATORY FINDINGS OF SIGNIFICANCE.</li> <li>a. Does the project have the potential to 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, 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?</li> </ul>				

19a. 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, and Habitat Assessment prepared by BLUE Consulting Group, September 2017), FPEIR 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.** As discussed in the Biological Resources Section of this Initial Study, potential impacts related to habitat of fish or wildlife species were all found to be **less than significant**. The vacant project site is located within an urban built-up area and is generally surrounded by existing development. The project site has potential habitat for nesting birds (palm tree adjacent to Palm Avenue). As a result, a pre-construction survey is required if construction will occur during the MBTA nesting season.

Additionally, potential impacts to cultural, archaeological and paleontological resources related to major periods of California and the City of Riverside's history or prehistory were discussed in the Cultural Resources Section of this Initial Study, and were found to be **less than significant with mitigation**.

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)?			
	future projects)?		· · · · · · · · · · · · · · · · · · ·	1

#### 19b. Response: (Source: FPEIR Section 6 – Long-Term Effects/ Cumulative Impacts for the General Plan 2025 Program)

**Less Than Significant Impact.** The proposed project has either no impact, a less than significant impact, or a less than significant impact with mitigation incorporated with respect to all environmental issues pursuant to CEQA. Due to the limited scope of direct physical impacts to the environment associated with the proposed project, the project's impacts are primarily project-specific in nature. In addition, since the project is consistent with the General Plan 2025, no new cumulative impacts are anticipated and therefore cumulative impacts of the proposed project beyond those previously considered in the GP 2025 FPEIR are **less than significant**.

ISSUES (AND SUPPORTING INFORMATION SOURCES):	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			$\boxtimes$	

#### 19c. Response: (Source: Project Plans, FPEIR Section 5 – Environmental Impact Analysis for the General Plan 2025 Program; Air Quality Analysis prepared by Urban Crossroads, July 2017 [Appendix 2]; Noise Impact Analysis prepared by Urban Crossroads September, 2017 [Appendix 1]))

Less Than Significant Impact. Effects on human beings were evaluated as part of the aesthetics, air quality, hydrology & water quality, noise, population and housing, public facilities, hazards and hazardous materials, recreation, and transportation traffic sections of this initial study. Based on the analysis and conclusions in this initial study, the project, with mitigation, will not cause substantial adverse effects, directly or indirectly to human beings. Therefore, potential direct and indirect impacts on human beings that result from the proposed project are less than significant.

Note: Authority cited: Sections 21083 and 21087, Public Resources Code. Reference: Sections 21080(c), 21080.1, 21080.3, 21082.1, 21083, 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).

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
Cultural Resources	<b>MM-CUL-1:</b> 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 interested tribes to provide an electronic copy of the revised plans for review. Additional consultation shall occur between the City, developer/applicant, and interested 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.	Prior to Grading Permit	Planning Division and Public Works Department.	The Applicant shall notify the City
Cultural Resources	<ul> <li>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.</li> <li>1. The project archaeologist, in consultation with interested 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: <ul> <li>a. Project grading and development scheduling;</li> <li>b. The development of a rotating or simultaneous schedule in coordination with the developer/applicant and the project archaeologist for designated Native American Tribal Monitors from the consulting tribes during grading, excavation, and ground-disturbing activities on the site, including the scheduling, safety requirements, duties, scope of work, and Native American Tribal Monitors' authority to stop and redirect grading activities in coordination with all project archaeologists;</li> <li>c. The protocols and stipulations that the Applicant, tribes, and project archaeologist/paleontologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits, or nonrenewable</li> </ul> </li> </ul>	Prior to Grading Permit	Planning Division and Public Works Department.	Submission of an Archaeological Monitoring Plan

#### Staff Recommended Mitigation Measures

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
	<ul> <li>paleontological resources that shall be subject to a cultural resources evaluation;</li> <li>d. Treatment and final disposition of any cultural and paleontological resources, sacred sites, and human remains if discovered on the project site; and</li> <li>e. The scheduling and timing of the Cultural Sensitivity Training noted in mitigation measure MM-CUL-4.</li> </ul>			
Cultural Resources	<ul> <li>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:</li> <li>1. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location on site or at the offices of the project archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and</li> <li>2. Treatment and Final Disposition: The landowner(s) shall relinquish ownership of all cultural resources, including sacred items, burial goods, and all archaeological artifacts and nonhuman 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: <ul> <li>a. Accommodate the process for on-site reburial of the discovered items with the consulting Native American tribes or bands. This shall include measures and provisions to protect the future reburial area from any future impacts. Reburial shall not occur until all cataloguing and basic recordation have been completed;</li> <li>b. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore will be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within Riverside County,</li> </ul></li></ul>	During Construction	Planning Division.	Submission of a Phase IV Monitoring Report

Impact Category	Mitigation Measures	Implementation Timing	Responsible Monitoring Party	Monitoring / Reporting Method
	<ul> <li>to be accompanied by payment of the fees necessary for permanent curation;</li> <li>c. If more than one Native American tribe or band is involved with the project and cannot come to an agreement as to the disposition of cultural materials, they shall be curated at the Western Science Center or Riverside Metropolitan Museum by default; and</li> <li>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; 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 interested tribes.</li> </ul>			
Cultural Resources	<b>MM-CUL-4: Cultural Sensitivity Training:</b> 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.	Prior to Grading Permit	Planning Division, Building and Safety Division and Public Works Department.	Submission of a Phase IV Monitoring Report



### AIR-ORT LAND USE COMMISSION RIVERSIDE COUNTY

May 19, 2017

Mr. Sean Kelleher, Project Planner City of Riverside Planning Division 3900 Main Street, 3 <sup>rd</sup> Floor				
Riverside CA 92522				
RE: AIRPORT LAND USE COMMISSION (ALUC) DEVELOPMENT REVIEW				
File No.:ZAP1085RI17Related File Nos.:PLN17-0228 (Rezone), P17-0097 (Design Review), P17-0098(Jorianas)P17-0090 (Jorianas)				
(Variance), P17-0099 (Variance) APNs: 226-332-022 and -023				
Dear Mr. Kelleher:				
On May 11, 2017, the Riverside County Airport Land Use Commission (ALUC) found City of Riverside Case No. PLN17-0228 (Rezone), a proposal to rezone 2.73 acres located westerly of				
Palm Avenue, southerly of Gardena Drive, and northerly of the Metrolink rail line by adding the Commercial Storage Overlay over the existing R-1-7000 Single Family Residential zoning,				
located westerly of Palm Avenue, southerly of Gardena Drive and northerly of the Metrolink rail				
line, <u>CONSISTENT</u> with the 2005 Riverside Municipal Airport Land Use Compatibility Plan, provided that the new zoning incorporates the appropriate Airport Protection Overlay Zone suffix (-AP-D and -AP-E), to the extent that such zoning overlay remains available for use.				
The above determination relates to aeronautical issues and does not necessarily constitute an endorsement of the proposed rezone, as the existing zoning is consistent with or without the addition of the Commercial Storage Overlay.				
On May 11, 2017, the Riverside County Airport Land Use Commission (ALUC) found City of Riverside Case Nos. P17-0097 (Design Review), a proposal to construct a self-storage facility which includes five self-storage buildings totaling 96,022 square feet, a 1,575 square foot management office and a 1,575 square foot managers residence on this 2.73-acre site, <u>CONSISTENT</u> with the 2005 Riverside Municipal Airport Land Use Compatibility Plan, subject to the following conditions:				
CONDITIONS:				
1. Any outdoor lighting installed shall be hooded or shielded to prevent either the spillage of lumens or reflection into the sky.				
2. The following uses shall be prohibited:				
(a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved navigational signal light or visual approach slope indicator.				

- (b) Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.
- (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area. (Such uses include landscaping utilizing water features, aquaculture, production of cereal grains, sunflower, and row crops, composting operations, trash transfer stations that are open on one or more sides, recycling centers containing putrescible wastes, construction and demolition debris facilities, fly ash disposal, and incinerators.)
- (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.
- 3. The attached notice shall be given to all prospective purchasers and/or tenants of the property.
- 4. Any new detention basins on the site shall be designed so as to provide for a maximum 48-hour detention period following the conclusion of the storm event for the design storm (may be less, but not more), and to remain totally dry between rainfalls. Vegetation in and around the detention basin(s) that would provide food or cover for bird species that would be incompatible with airport operations shall not be utilized in project landscaping.
- 5. Prior to issuance of a building permit, the City of Riverside shall apply zoning incorporating the Airport Protection Overlay Zones (R-1-7000-CS-AP-D and R-1-7000-CS-AP-E) to the site, provided that such zoning overlay remains available for use.
- 6. This project has been evaluated for 96,022 square feet of self-storage area and 1,575 square feet of office. Any increase in building area or change in use in the Zone D portion of the project will require review by the Airport Land Use Commission.

The Airport Land Use Commission also found City of Riverside Case Nos. P17-0098 and P17-0099 (Variances) to allow an increase in lot coverage from 10% to 50% and an increase in building mass and height to two stories with a height of 36 feet **CONSISTENT** with the 2005 Riverside Municipal Airport Land Use Compatibility Plan, as the Plan does not restrict lot coverage on sites less than 10 acres in area and the proposed height would result in a top point elevation that would not require a Part 77 review by the Federal Aviation Administration Obstruction Evaluation Service at the site's distance from that airport's runways.

If you have any questions, please contact Paul Rull, ALUC Urban Regional Planner IV, at (951) 955-6893 or John Guerin, ALUC Principal Planner, at (951) 955-0982.

Sincerely, RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

Simon A. Housman, ALUC Director

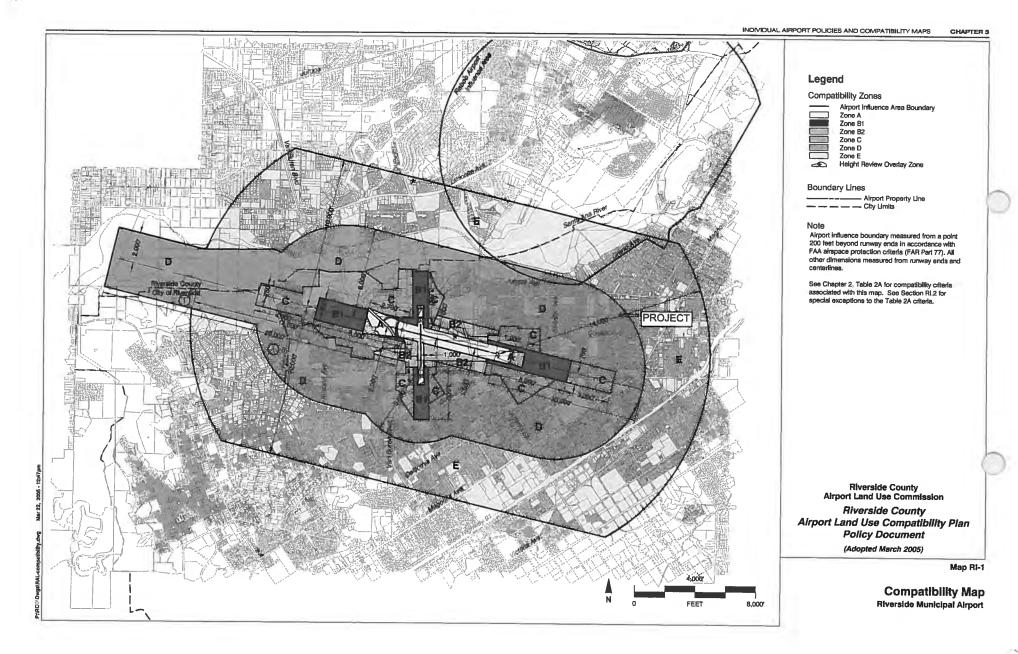
Attachments: Notice of Airport in Vicinity

cc: Palm Avenue Storage, LLC/Kingsfield Development Corporation (applicant) Central Metal, Inc. (listed landowner) Debbie Chaple (concerned citizen/speaker) Kim Ellis, Manager, Riverside Municipal Airport ALUC Case File

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# NOTICE OF AIRPORT IN VICINITY

This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances [can vary from person to person. You may wish to consider what airport annoyances], if any, are associated with the property before you complete your purchase and determine whether they are acceptable to vou. Business & Professions Code Section 11010 (b) 13)(A)



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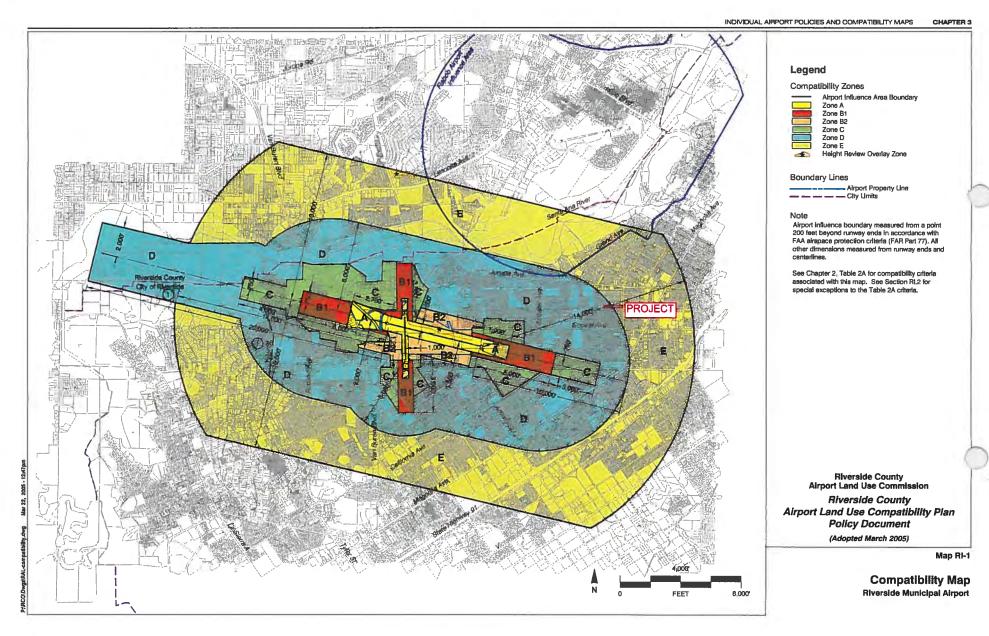


Exhibit 9 - Airport Land Use Commission (ALUC) Development Review - File No. ZAP1085RI17

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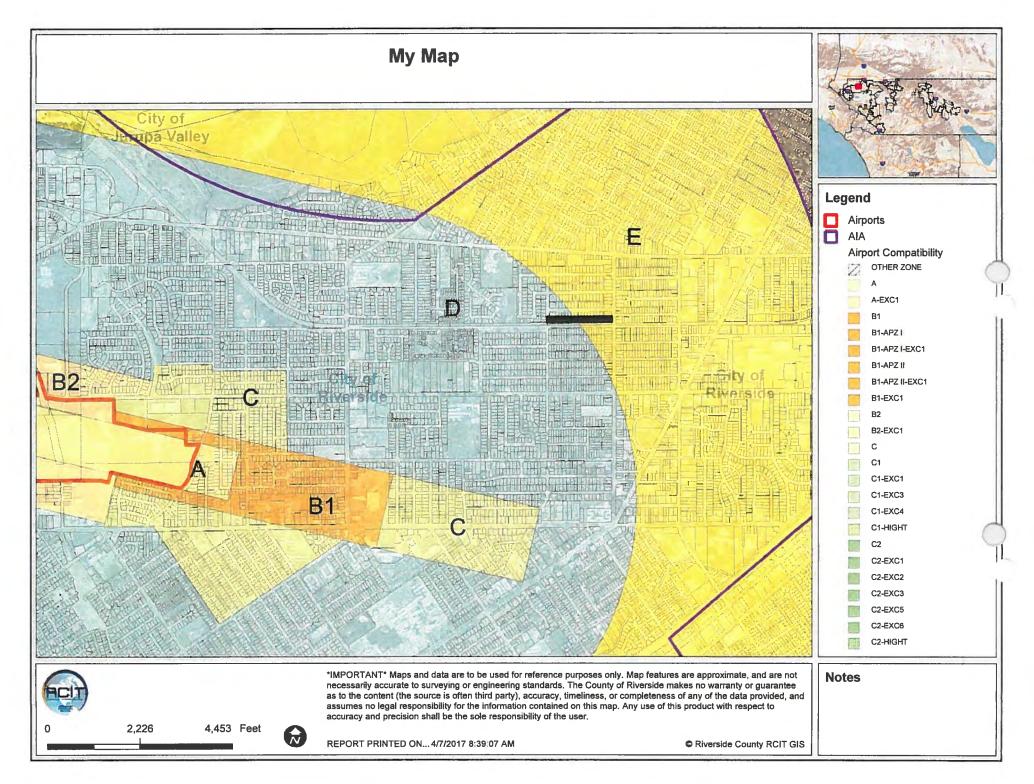
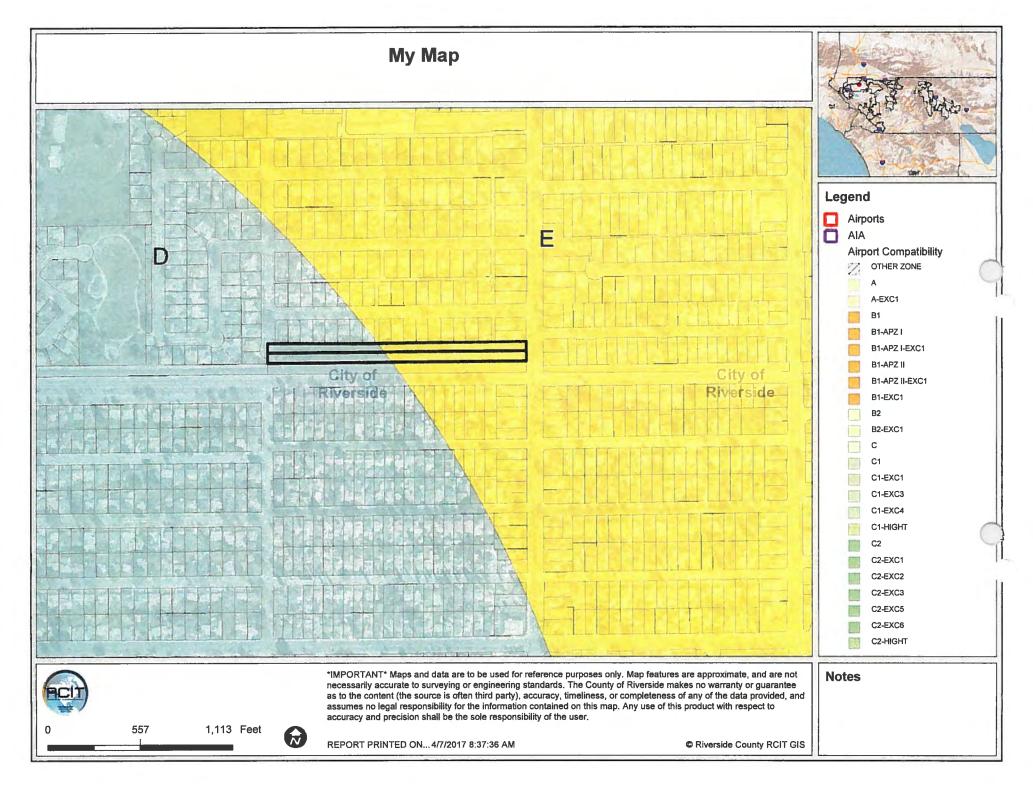
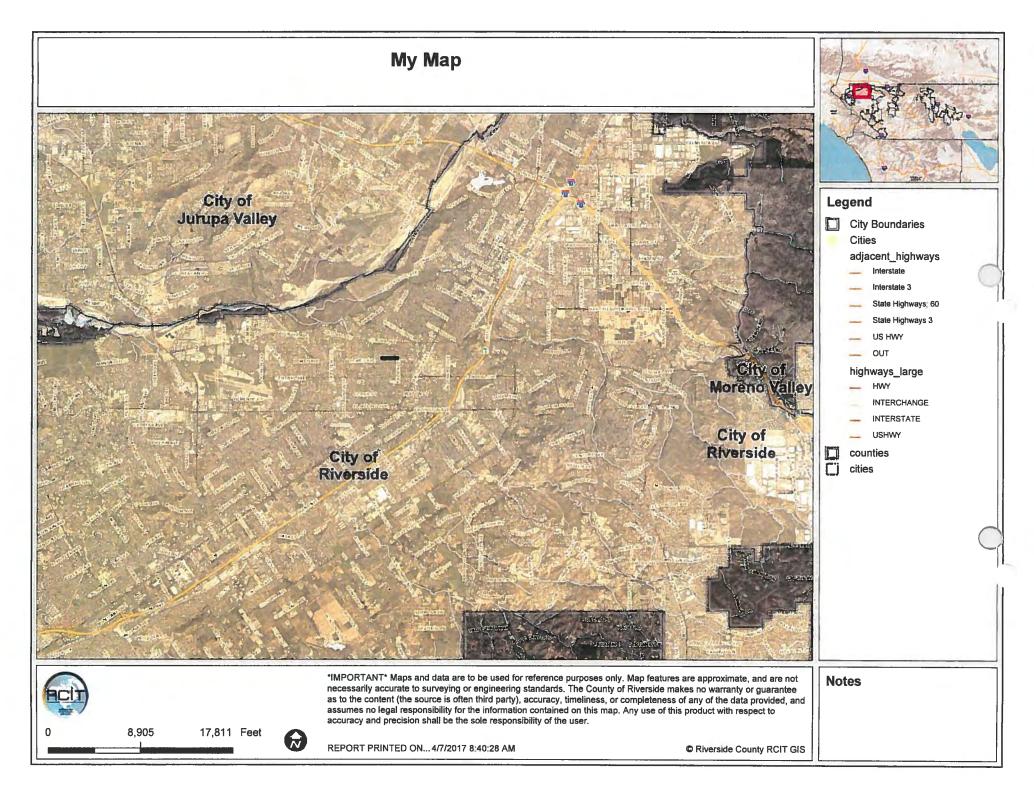


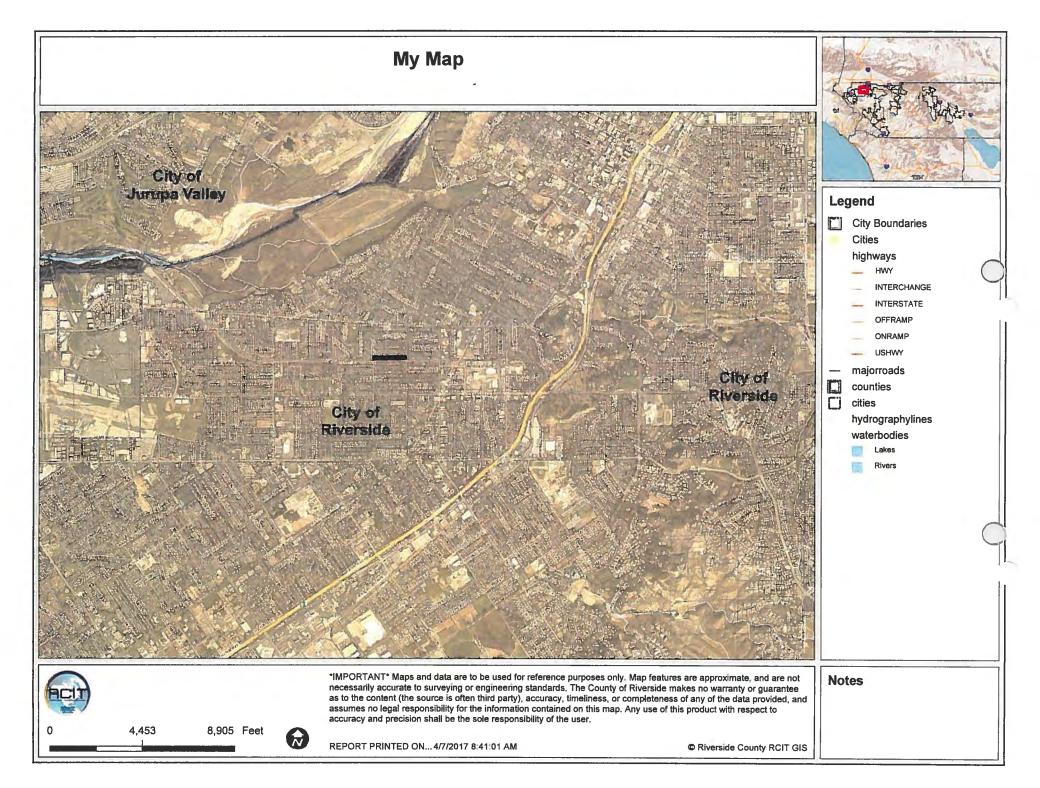
Exhibit 9 - Airport Land Use Commission (ALUC) Development Review – File No. ZAP1085RI17



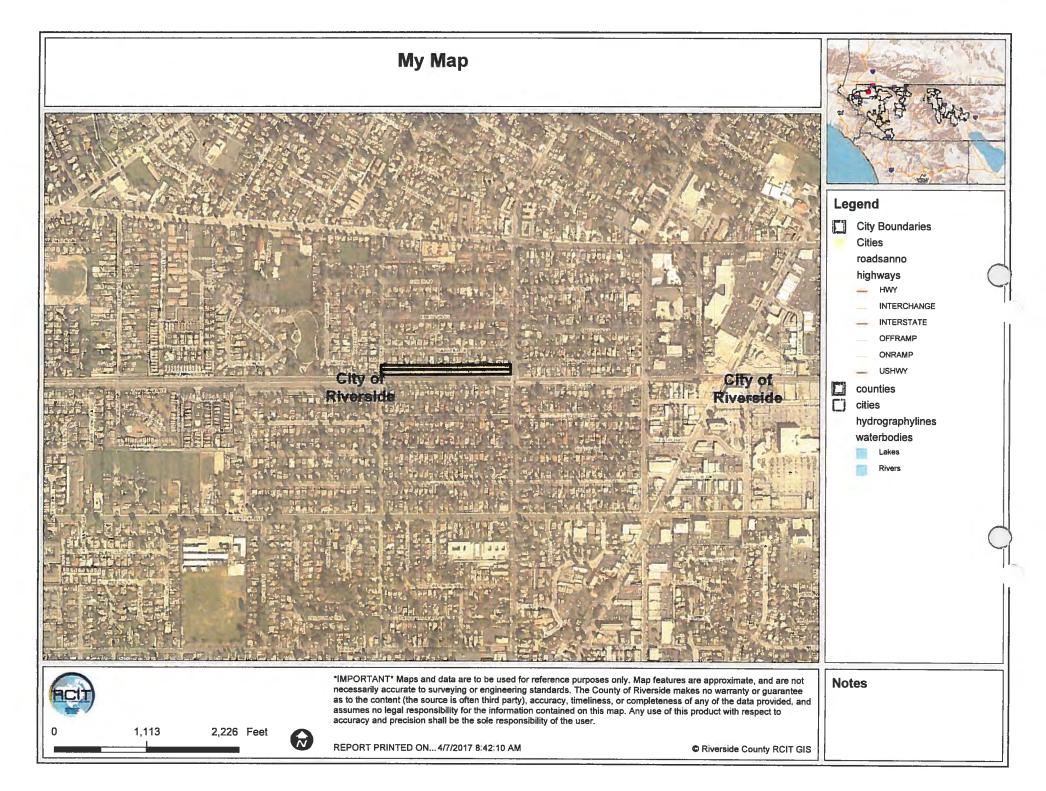
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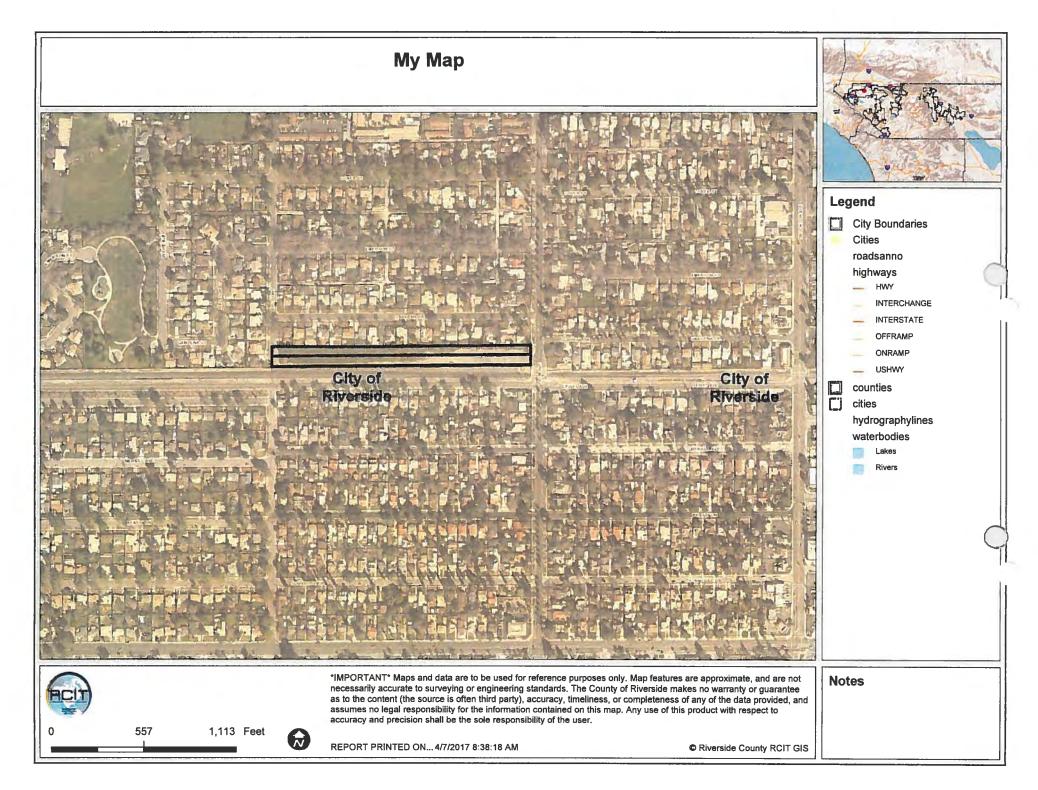


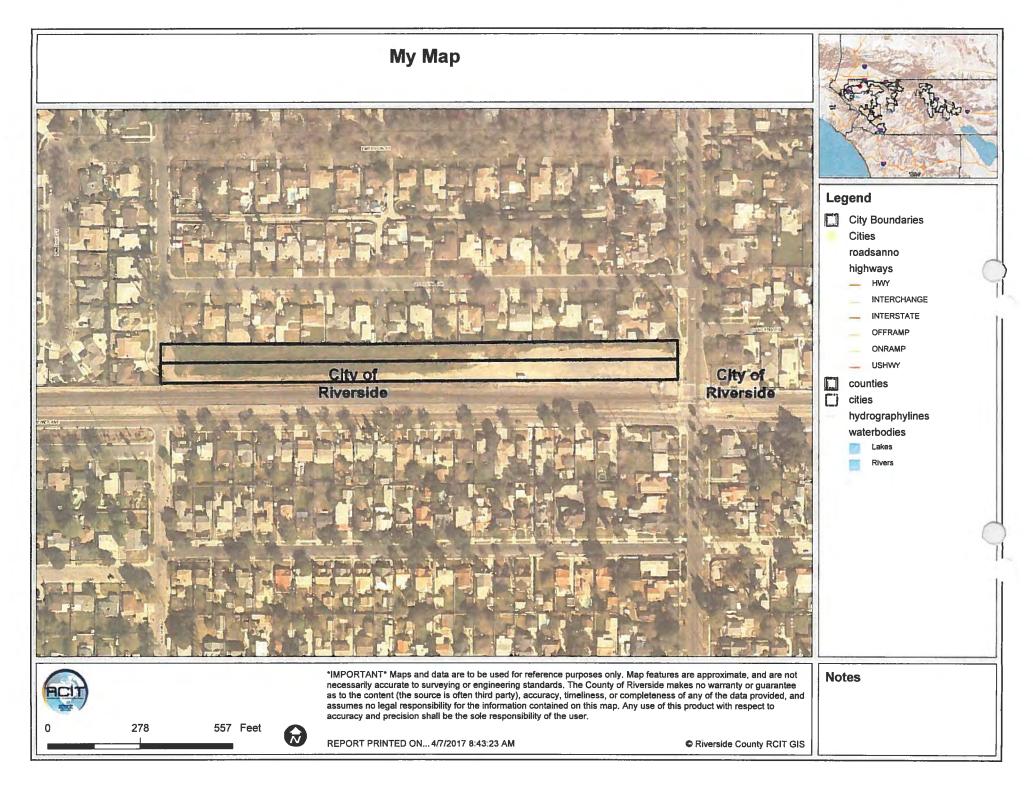
#### Exhibit 9 - Airport Land Use Commission (ALUC) Development Review - File No. ZAP1085RI17

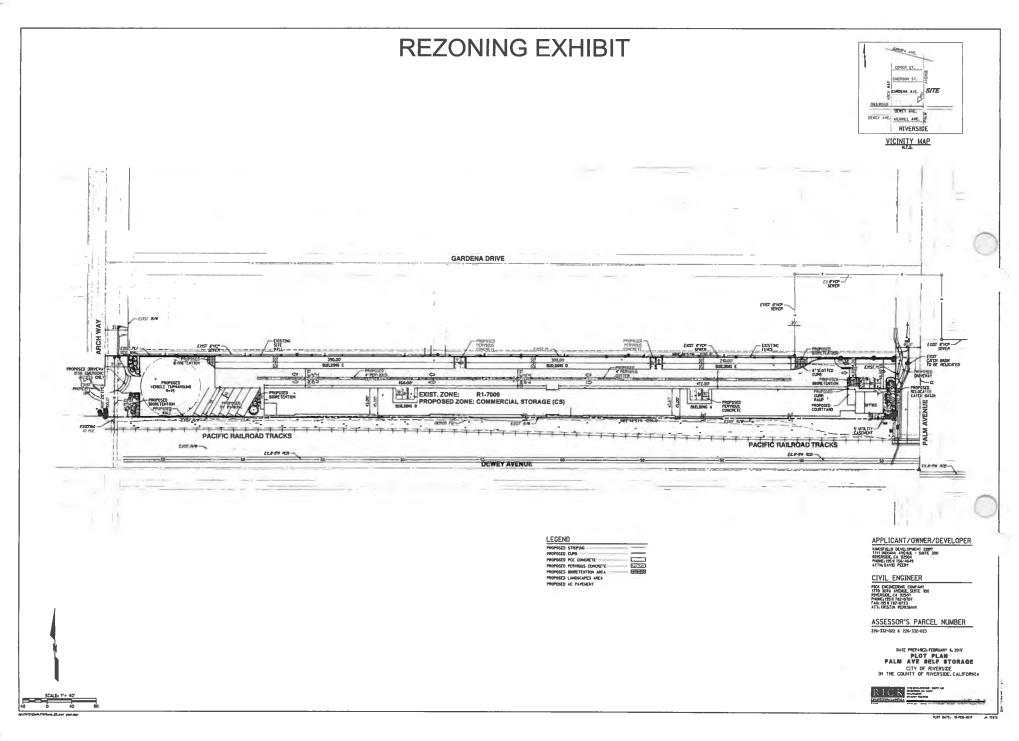


#### Exhibit 9 - Airport Land Use Commission (ALUC) Development Review – File No. ZAP1085RI17

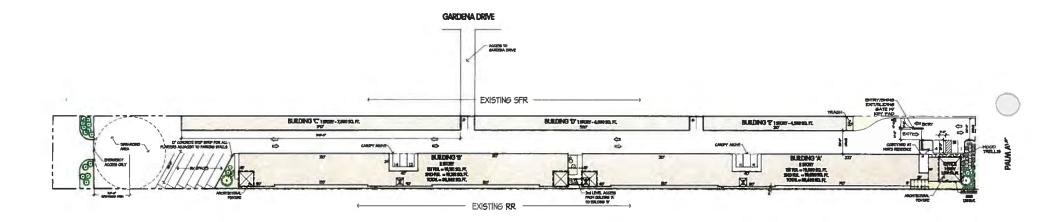








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SITE AREA:		SETBACKS		BUILDING CODES
LOT SIZE (GROSS): ±118,917 SQ. FT.		PER CODE SECTION 19.190.020(C)		2013 EDITION OF THE 2013 EDITION OF THE
	±2.73 ACRE	SETBACK OF 20' FROM BOTH ROW THE PROPERTY LINES ADJACENT TO		2013 EDITION OF THE 2013 EDITION OF THE
PROPOSED ZONE:		19.190.0200 ALLOWS FOR PERIMET		2013 EDITION OF THE
COMMERCIAL STORAGE OVERLAY ZO	NE CS	WITH NO SETBACKS.		2013 EDITION OF THE
STORAGE BUILDING GROSS AREA:		PARKING:		OCCUPANCY CLAS
BUILDING A - 2 STORY:	± 39,660 50. FT.	PARKING IS FACTORED AT A RATE	OF 1 SPACE PER 250	STORAGE:
BUILDING B - 2 STORY:	± 38,362 SQ. FT.	SQUARE FEET OF OFFICE AREA FOR	THE USE OF SELF	OFFICE:
BUILDING C - 1 STORY:	± 7,800 SQ. FT.	STORAGE.		
BUILDING D - 1 STORY:	± 6,000 SQ. FT.			and a standard and a
BUILDING D - 1 STORY:	± 4,200 SQ. FT.	PARKING REQUIRED:	6 SPACES	SPRINKLERED;
STORAGE MANAGEMENT OFFICE:	± 1,575 SQ. FT.	PARKING PROVIDED:	14 SPACES	
MANAGER'S RESIDENCE:	± 1,575 SQ. FT.			BUILDING SHALL BE FUI
TOTAL GROSS BUILDING AREA:	± 99,172 SQ. FT.			NFPA 13
GROSS STORAGE AREA:	± 96,022, SQ. FT.			
NET RENTABLE STORAGE AREA (0809	± 16,818 SQ. FT.			

### 2013 EDITION OF THE CALIFORNIA BUILDING CODE 2013 EDITION OF THE CALIFORNIA MECHANICAL CODE

2013 EDITION OF THE CALIFORNIA PLUMBING CODE 2013 EDITION OF THE CALIFORNIA ELECTRICAL CODE 2013 EDITION OF THE CALIFORNIA GREEN BUILDING STANDARDS CODE OCCUPANCY CLASSIFICATIONS: TYPES OF CONSTRUCTION:

STORAGE: OFFICE:	S-1 B	ALL BUILDINGS:	II - B

### SPRINKLERED;

BUILDING SHALL BE FULLY SPRINKLERED IN ACCORDANCE WITH SECTION 903.3.1.1 AND NFPA 13

#### SCOPE OF WORK:

NEW SELF-STORAGE BUILDINGS AND OFFICE WITH SITE HARDSCAPE & LANDSCAPE IMPROVEMENTS.

#### OCCUPANCY SEPARATION:

NON SEPARATED OCCUPANCIES' METHOD (PER SECTION 508.3) USED, MOST RESTRICTIVE OCCUPANCY IS S-1. BUILDING HEIGHT AND AREA COMPLY, SEE CALCULATION BELOW.

#### ALLOWABLE BUILDING AREA:

PRELIMINARY SITE PL

ALLOWABLE AREA INCREASES PER STORY - PER SECTION 506  $A_0 = \{A_1 + [A_1 \times I_2]\}$ 

At = ALLOWABLE AREA PER STORY PER TABLE 503 = 17,500 S.F.

is = AREA INCREASE FACTOR DUE TO SPRINKLER PROTECTION (506.3) = 2

Ac = {17,500 + [17,500 X 2] } = 52,500 S.F. ALLOWABLE AREA PER STORY

SCHEME D

JOB NU

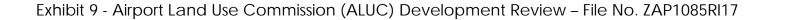
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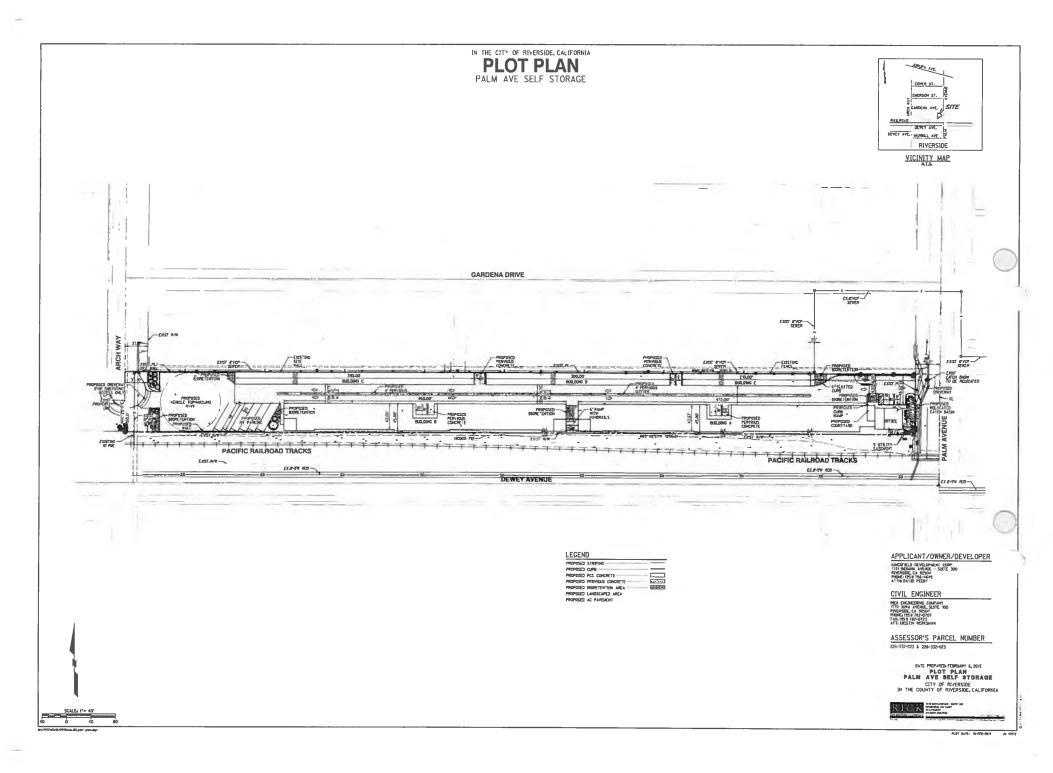
14-3021

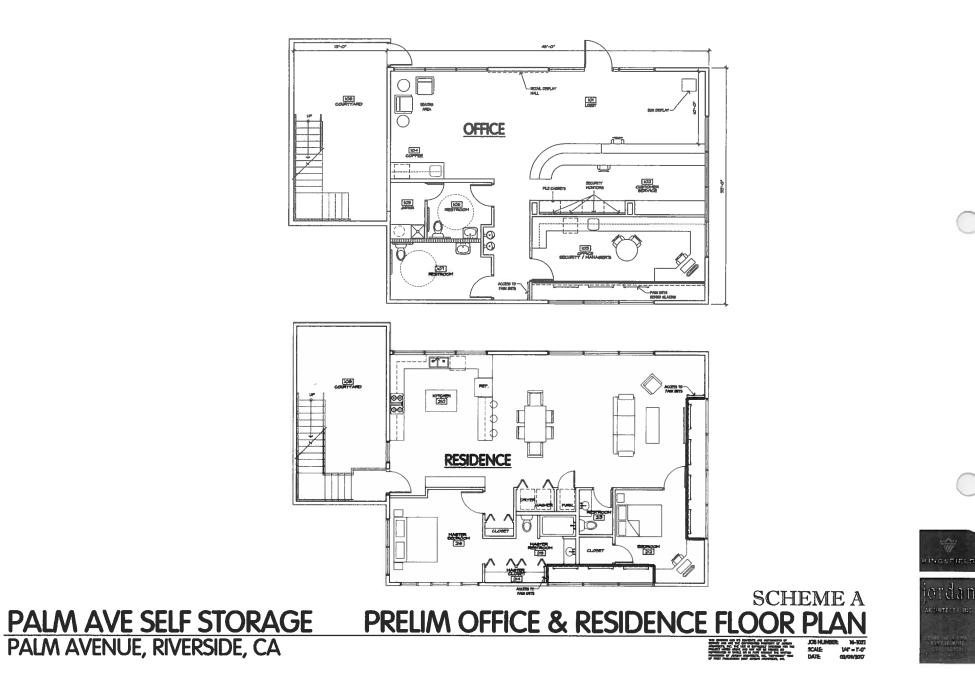
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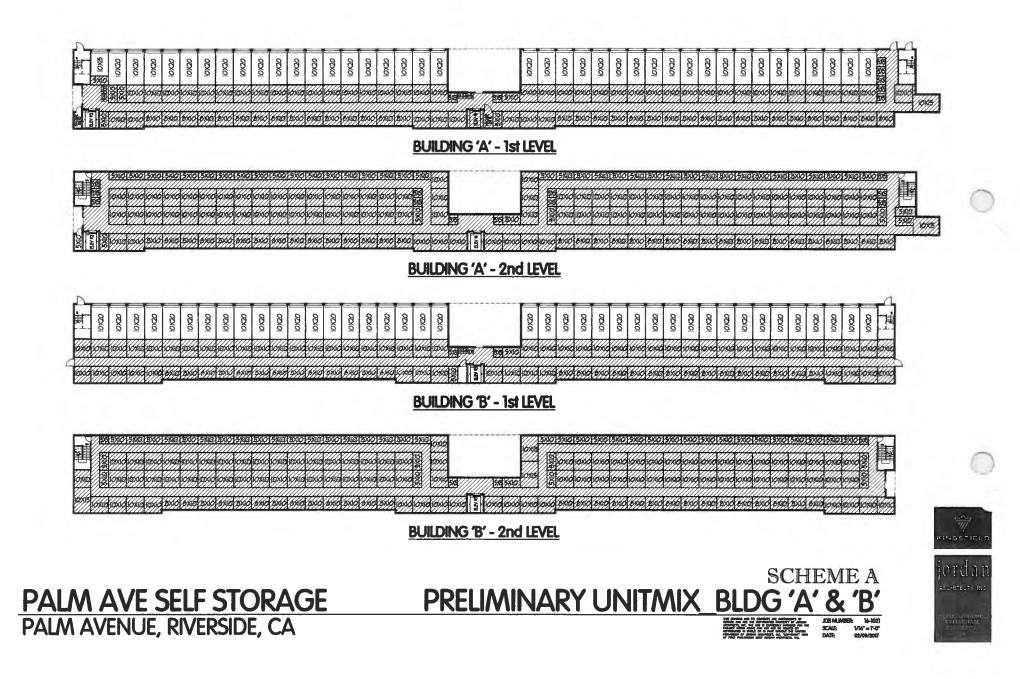


# PALM AVE SELF STORAGE PALM AVENUE, RIVERSIDE, CA







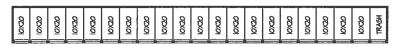


#### OXX0 ocxol OCXOl 0CX0 00 XQ 0X0 0000 ozxol ocxol ocxol 0000 0000 OCXO 0 C C C C C C 0000 0000 0 X X O ĝ ocxo 0XX0 ocxo 0 X O 0000 0CX0 0CX0 0000 0X00 0XX0 0CX0 2000 ocxol ocxol 0XX0 2000 0XX0 0X0 0X0 0 CXO OCXO

BUILDING 'C'

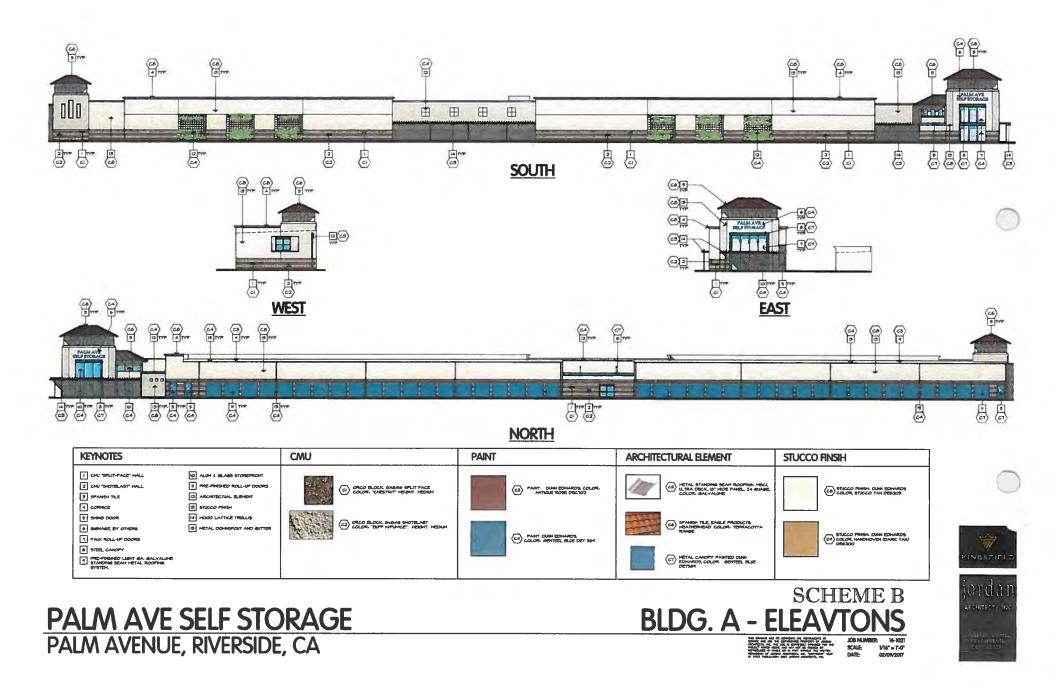
#### 200 12,00 12X20 2X20 2X20 12X20 12X20 00XCI 12X20 12X20 200 12X20 2220 12X20 12X20 12X20 12X20 12X20 OCXCI OCXCI 12X20 12X20 0CXCI

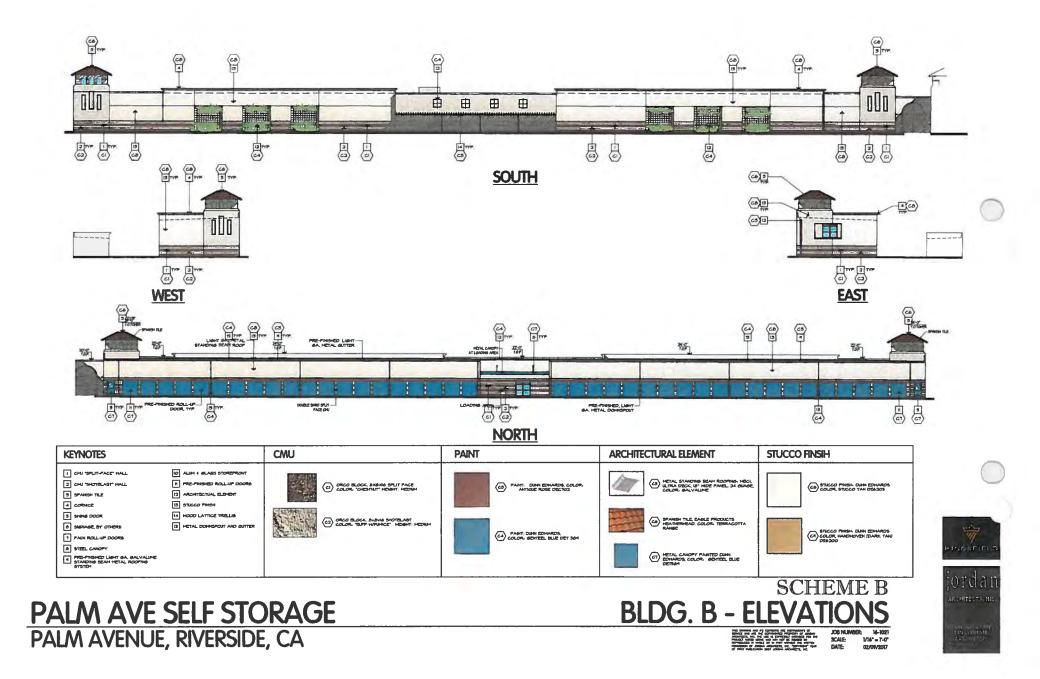
BUILDING 'D'

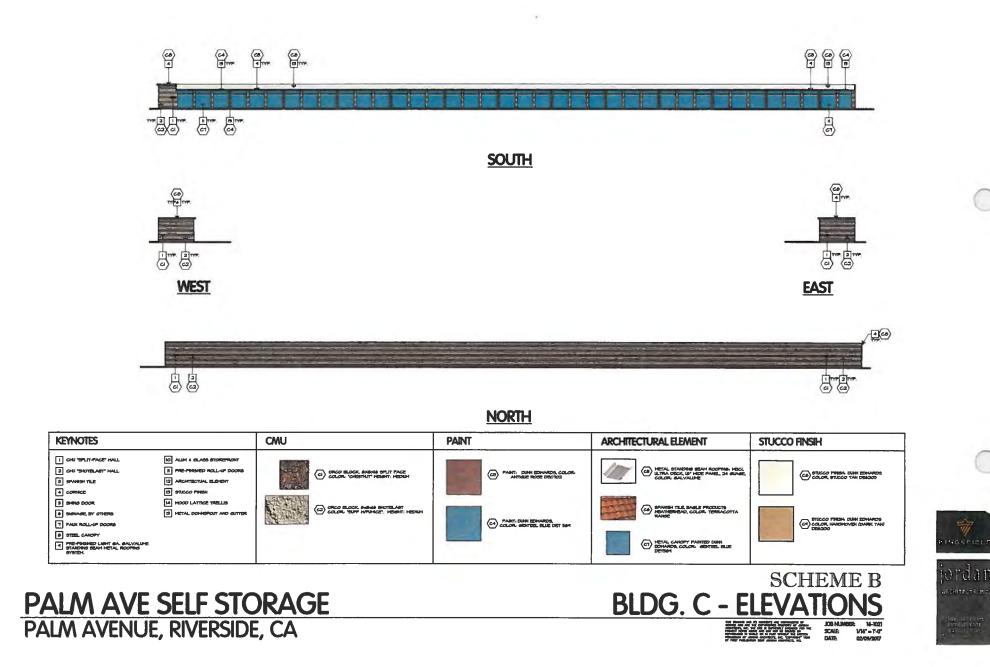


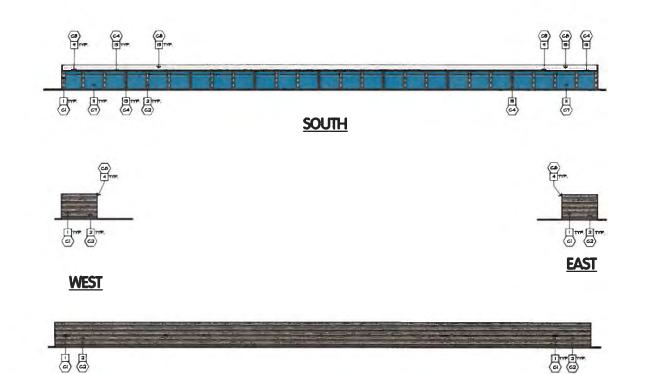
BUILDING 'E'



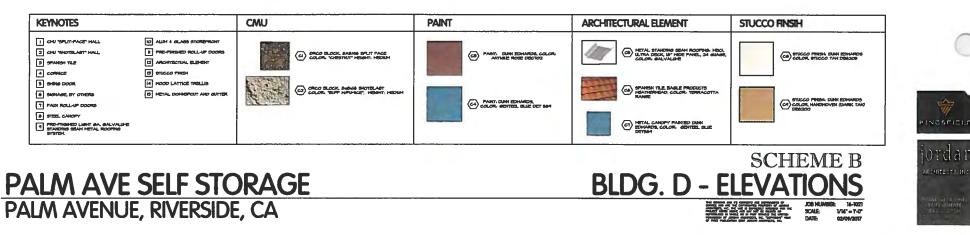


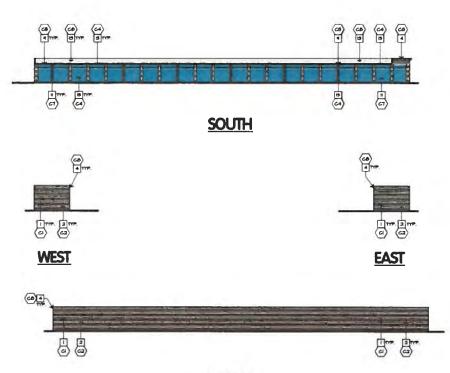




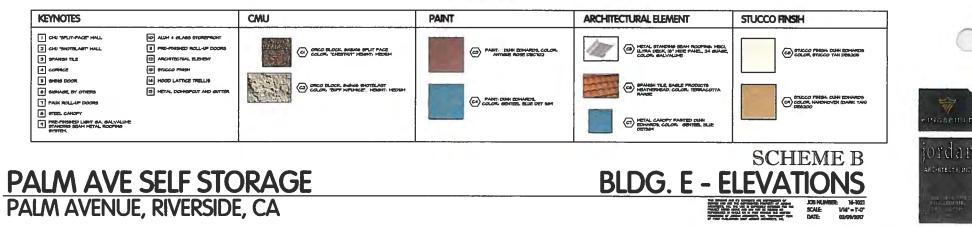


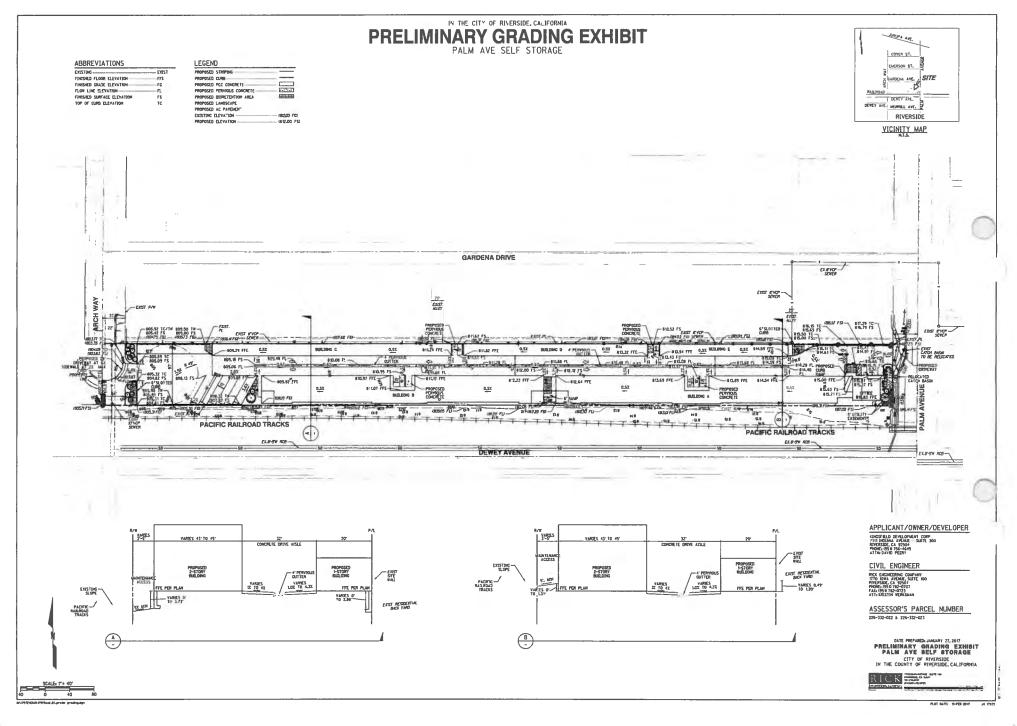
NORTH

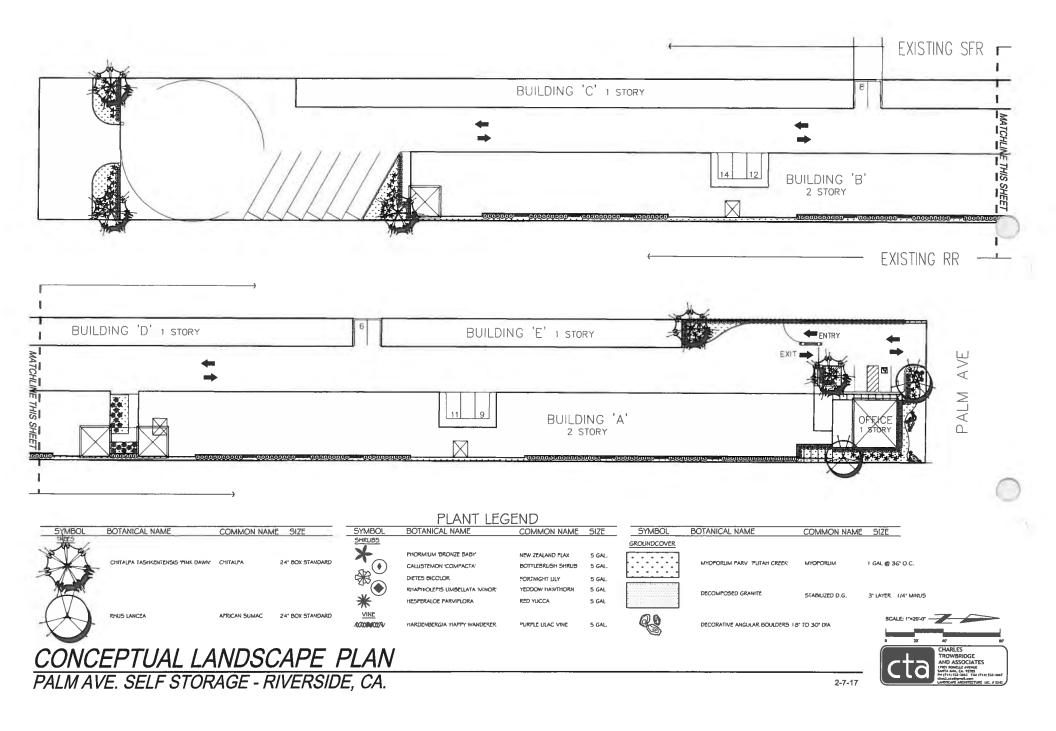




NORTH









East side of Palm Avenue looking west.



Northeast corner of the intersection of Palm Avenue and Dewey Avenue looking northwest.

## Exhibit 10 - Existing Site Photos



East side of Arch Way looking east.



Southeast corner of the project site looking northeast.