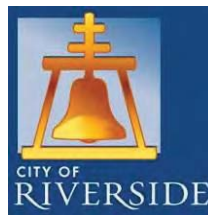


**Center Street Commerce Building
Draft Initial Study
Mitigated Negative Declaration**

Prepared for:

City of Riverside
Community and Economic Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522



Project Proponent:

Transition Properties, LP
PO Box 1010
Blue Jay, California 92317

Prepared by:

MIG, Inc.
1500 Iowa Avenue, Suite 110
Riverside, California 92507



November 2017

- This document is designed for double-sided printing -



Planning Commission - Exhibit 1 - Development Review Committee Staff Report
Development Review Committee - Exhibit 7 - CEQA Documents

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1 Introduction

The City of Riverside (Lead Agency) received applications for Design Review and Lot Consolidation for a 308,000-square foot commercial building located on the south side of Center Street and north of Placentia Lane in the City of Riverside. The approval of these applications constitutes a project that is subject to review under the California Environmental Quality Act (CEQA) 1970 (Public Resources Code, Section 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations, Section 15000 et. seq.).

This Initial Study has been prepared to assess the short-term, long-term, and cumulative environmental impacts that could result from the proposed project.

This report has been prepared to comply with Section 15063 of the State CEQA Guidelines, which sets forth the required contents of an Initial Study. These include:

- A description of the project, including the location of the project (See Section 2);
- Identification of the environmental setting (See Section 2.11);
- Identification of environmental effects by use of a checklist, matrix, or other methods, provided that entries on the checklist or other form are briefly explained to indicate that there is some evidence to support the entries (See Section 4.);
- Discussion of ways to mitigate significant effects identified, if any (See Section 4);
- Examination of whether the project is compatible with existing zoning, plans, and other applicable land use controls (See Sections 4.10); and
- The name(s) of the person(s) who prepared or participated in the preparation of the Initial Study (See Section 5).

1.1 – Purpose of CEQA

The body of state law known as *CEQA* was originally enacted in 1970 and has been amended a number of times since then. The legislative intent of these regulations is established in Section 21000 of the California Public Resources Code, as follows:

The Legislature finds and declares as follows:

- a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.
- b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.
- c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.
- d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.
- e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.
- f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.
- g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

The Legislature further finds and declares that it is the policy of the State to:

- h) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.
- i) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise.
- j) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.
- k) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.
- l) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.
- m) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.
- n) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

A concise statement of legislative policy, with respect to public agency consideration of projects for some form of approval, is found in Section 21002 of the Public Resources Code, quoted below:

The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

1.2 – Tiering

This Initial Study *tiers* from the City's General Plan EIR. Section 15152 et seq of the CEQA Guidelines describes *tiering* as a streamlining tool as follows:

- (a) *Tiering* refers to using the analysis of general matters contained in a broader EIR (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.
- (b) Agencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration. However, the level of detail contained in a first tier EIR need not be greater than that of the program, plan, policy, or ordinance being analyzed.
- (c) Where a lead agency is using the tiering process in connection with an EIR for a large-scale planning approval, such as a general plan or component thereof (e.g., an area plan or community plan), the development of detailed,

site-specific information may not be feasible but can be deferred, in many instances, until such time as the lead agency prepares a future environmental document in connection with a project of a more limited geographical scale, as long as deferral does not prevent adequate identification of significant effects of the planning approval at hand.

- (d) Where an EIR has been prepared and certified for a program, plan, policy, or ordinance consistent with the requirements of this section, any lead agency for a later project pursuant to or consistent with the program, plan, policy, or ordinance should limit the EIR or negative declaration on the later project to affects which:
 - (1) Were not examined as significant effects on the environment in the prior EIR; or
 - (2) Are susceptible to substantial reduction or avoidance by the choice of specific revisions in the project, by the imposition of conditions, or other means.
- (e) Tiering under this section shall be limited to situations where the project is consistent with the general plan and zoning of the city or county in which the project is located, except that a project requiring a rezone to achieve or maintain conformity with a general plan may be subject to tiering.
- (f) A later EIR shall be required when the initial study or other analysis finds that the later project may cause significant effects on the environment that were not adequately addressed in the prior EIR. A negative declaration shall be required when the provisions of Section 15070 are met.
 - (1) Where a lead agency determines that a cumulative effect has been adequately addressed in the prior EIR that effect is not treated as significant for purposes of the later EIR or negative declaration, and need not be discussed in detail.
 - (2) When assessing whether there is a new significant cumulative effect, the lead agency shall consider whether the incremental effects of the project would be considerable when viewed in the context of past, present, and probable future projects. At this point, the question is not whether there is a significant cumulative impact, but whether the effects of the project are cumulatively considerable. For a discussion on how to assess whether project impacts are cumulatively considerable, see Section 15064(i).
 - (3) Significant environmental effects have been *adequately addressed* if the lead agency determines that:
 - (A) they have been mitigated or avoided as a result of the prior environmental impact report and findings adopted in connection with that prior environmental report; or
 - (B) they have been examined at a sufficient level of detail in the prior environmental impact report to enable those effects to be mitigated or avoided by site specific revisions, the imposition of conditions, or by other means in connection with the approval of the later project.
- (g) When tiering is used, the later EIRs or negative declarations shall refer to the prior EIR and state where a copy of the prior EIR may be examined. The later EIR or negative declaration should state that the lead agency is using the tiering concept and that it is being tiered with the earlier EIR.

1.3 – Public Comments

Comments from all agencies and individuals are invited regarding the information contained in this Initial Study. Such comments should explain any perceived deficiencies in the assessment of impacts, identify the information that is

purportedly lacking in the Initial Study or indicate where the information may be found. All comments on the Initial Study are to be submitted to:

Brian Norton, Senior Planner
City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
951-826-2308

Following a 20-day period of circulation and review of the Initial Study, all comments will be considered by the City of Riverside prior to adoption.

1.4 – Availability of Materials

All materials related to the preparation of this Initial Study are available for public review. To request an appointment to review these materials, please contact:

Brian Norton, Senior Planner
City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522
951-826-2308

2.1 – Project Title

Center Street Commerce Building

2.2 – Lead Agency Name and Address

City of Riverside
Community Development Department
3900 Main Street, 3rd Floor
Riverside, California 92522

2.3 – Contact Person and Phone Number

Brian Norton, Associate Planner
951-826-5371
bnorton@riversideca.gov

2.4 – Project Location

South side of Center Street and north of Placentia Lane
Northside Neighborhood
Riverside, California 92507
(See Exhibit 1, Regional Context and Vicinity Map)

2.5 – Project Sponsor's Name and Address

Transition Properties, LP
PO Box 1010
Blue Jay, California 92317

2.6 – General Plan Land Use Designation

The B/OP – Business/Office Park

2.7 – Zoning District

BMP – Business and Manufacturing Park

The project site is located in the Northside Neighborhood where the City of Riverside Community and Economic Development Department (CEDD), in partnership with the City of Colton, is initiating an effort to prepare the Northside Neighborhood & Pellissier Ranch Inter-Jurisdictional Specific Plan. The City recently sought a consultant team with expertise in, but not limited to, meeting facilitation, land use planning, community-based urban design, real-estate economics, historic preservation, transportation, and infrastructure systems, to assist with the effort. The City initiated a Request for Qualifications/Request for Proposals (RFQ/RFP) process and concluded with three potential consultant teams. As of August 2016, CEDD staff is recommending Rick Engineering as the preferred firm based on the results of the RFQ/RFP process. This recommendation is subject to approval by the Land Use Committee and City Council. CEDD anticipates that final contract execution with the selected consultant will occur in the fall or winter of 2016 followed soon after by the project initiation. The City estimates that preparation of the specific plan will

take up to twenty months. Interested parties and individuals can find more information about the Northside Specific Plan at <http://www.riversideca.gov/planning/northside/>.

2.8 – Project Description

The project includes construction of a 308,000-square foot building (see Exhibit 2, Site Plan) on 15.88 gross acres (15.63 net acres) located south side of Center Street and north of Placentia Lane (APNs 246-070-017, 246-040-002, -026, and -027). The building could be used for any number of commercial or light industrial uses as permitted in the BMP zone; however, end users have not been identified at this time, as such, specific details about the future operation of the facility are not currently available. The proposed design will be a concrete tilt-up building (See Exhibit 2b, Project Elevations). The project includes 110,591 square feet of landscaping, the potential for up to 167 passenger vehicle parking stalls, 237 truck trailer stalls, and 62 loading docks. The project applications include Design Review and Lot Consolidation, from 4 lots to 1 lot.

The project site is primarily vacant with a vacant single family residence and five ancillary structures located on the southeastern portion of the site.

The project will have access to Center Street via two 40-foot wide driveways located along the frontage. No access to Placentia Lane to the south will be provided. Interior drive aisles along the western, eastern, and southern sides of the building will have a minimum width of 40 feet to provide adequate vehicle and emergency access as required by the Fire Department. The interior drive aisle along the northern side of the building will be 24 feet wide and provide access for passenger vehicles. Center Street and Placentia Lane are not fully improved streets. The proposed project will include the construction of new curbs and gutters, public sidewalk, and landscaping.

Construction Scheduling

It was estimated that 7,416 square feet of existing, on-site structures will be demolished to accommodate the project. Construction of the building is anticipated to start in 2016 and take approximately 19 months to complete.

Grading and Drainage

The project site is relatively flat and will not require the import or export of soils. Currently, the project site flows from north to south. The proposed building will include roof drains that are directed over proposed landscaped areas before being routed to the proposed landscaped infiltration basin. The proposed infiltration basin will be located at the southeastern corner of the project site and will exceed the existing infiltration capacity of the project site under existing conditions. The proposed project will include a 20-foot wide drainage easement to carry off-site flows through the site and outlet into Placentia Lane.

Landscaping

The proposed landscape coverage for the site is 110,591 square feet. The landscaping will be designed to significantly reduce the required water consumption of the site as compared to traditional landscape designs. Landscaped areas are to be located around the perimeter of the site. In addition, an infiltration basin will be located at the southeastern corner of the project site.

Utilities

Water service will be provided by Riverside Public Utilities Water Department. The proposed project will connect to existing water lines in Center Street to provide for domestic, landscape, and fire suppression. Electrical service will be provided by Riverside Public Utilities Electric Department via connections to existing circuits on Placentia Lane. Sewer service will be provided by the City of Riverside. In addition, there is an existing overhead circuit running through the site that will be relocated and placed within an easement in favor of Riverside Public Utilities Electric Department. Natural gas will be provided by Southern California Gas Company. The proposed project will be served by AT&T for phone service and Charter Cable for cable television.

2.9 – Surrounding Land Uses

Existing development surrounds the project site to the north, east, and south. Vacant land is located to the west and south of the project site. Table 1 (Surrounding Land Uses) lists the existing land use, General Plan Designations, and Zoning districts surrounding the project site.

Table 1
Surrounding Land Uses

Direction	General Plan Designation	Zoning District	Existing Land Use
Project Site	B/OP - Business/Office Park	BMP – Business and Manufacturing Park	Vacant, Single Family Residence
North*	Light Industrial	M-1 – Light Industrial	Material Storage Yard
South	PR - Private Recreation B/OP - Business/Office Park	BMP – Business and Manufacturing Park PF – Public Facilities	Soccer Fields, Vacant
East	B/OP - Business/Office Park	BMP – Business and Manufacturing Park	Towing Company
West	B/OP - Business/Office Park	BMP – Business and Manufacturing Park	Vacant

* City of Colton designation.

2.10 – Environmental Setting

The project site is primarily vacant with a vacant single family residence and five ancillary structures located on the southeastern portion of the site and is located within a business and manufacturing park area. The AB Brown Sports Complex is located to the south of the project site. The project site is bound by Center Street to the north and Placenta Lane to the south. Existing on-site vegetation includes disturbed/ruderal habitat as well as ornamental tree species along the fence line near the project site's southwest corner, and native trees and shrub species interspersed throughout the disturbed and ruderal habitat areas. Existing drainage proceeds to the south westerly corner of the site. Regional transportation is provided by Interstate 215 to the east, State Routes 60 and 91 to the south, and Interstate 10 to the north.

2.11 – Required Approvals

The City of Riverside is the only land use authority for this project and this project will require the following City approvals:

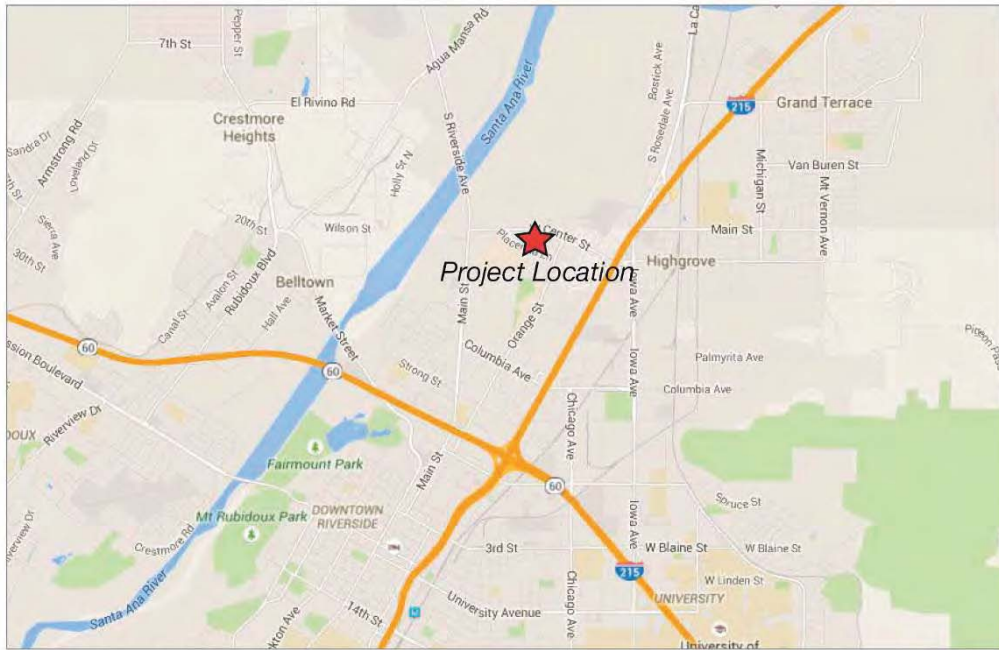
- Design Review (P14-1033)
- Lot Consolidation (P14-1034)

2.12 – Other Public Agencies Whose Approval is Required

None

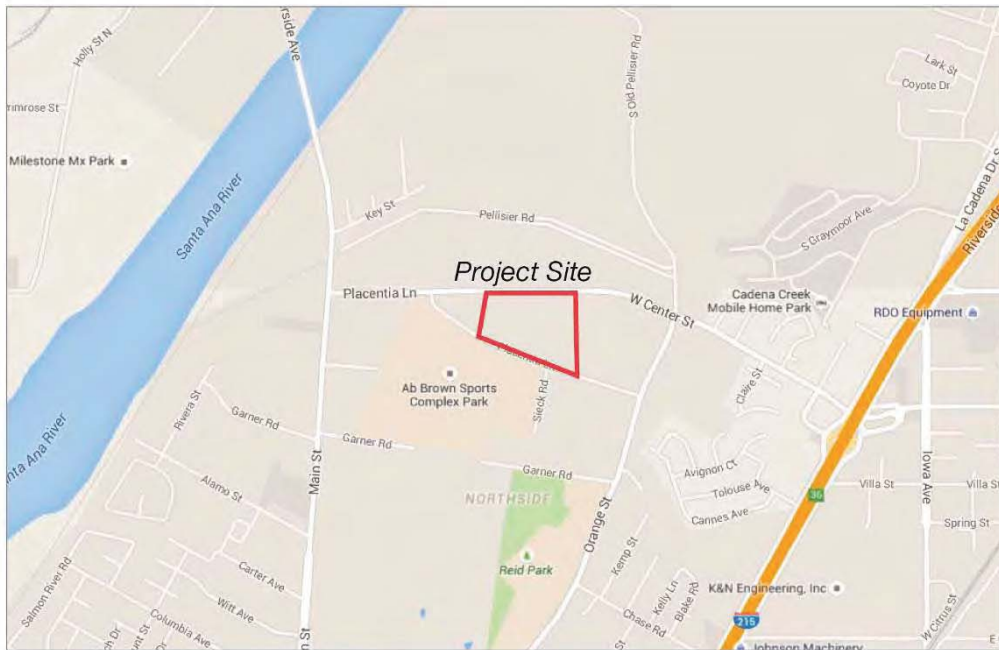
2.13 – Project Specific Technical Studies

- Air Quality/GHG Assessment
- Health Risk Assessment
- Biological Assessment
- Historical/Archaeological Resources Survey
- Geotechnical Engineering Investigation
- Water Quality Management Plan
- Noise Study



Source: Google Maps, 2015

Regional



Source: Google Maps, 2015

Vicinity



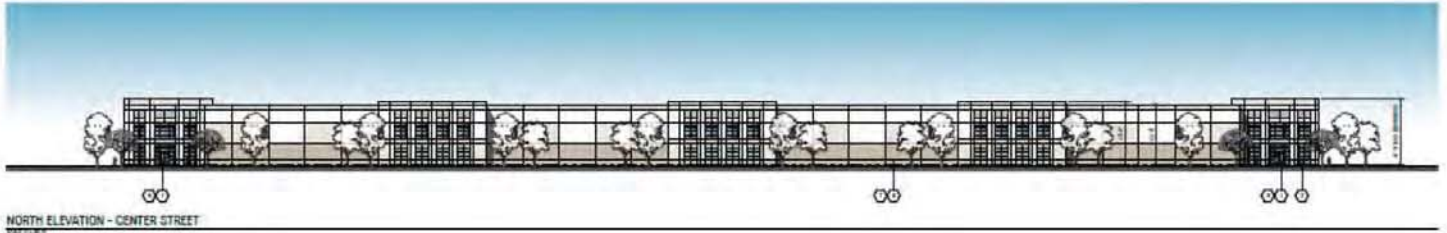
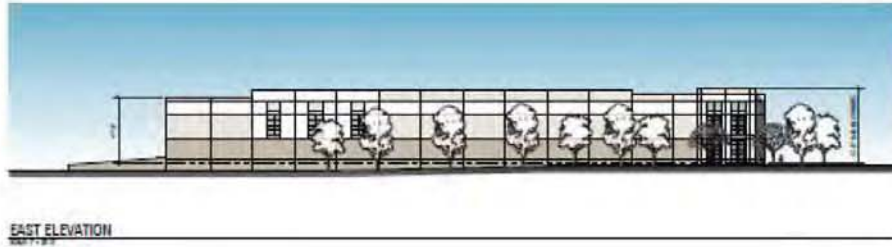
Exhibit 1 Regional and Vicinity Map

<http://www.migcom.com> • 951-787-9222

Planning Commission - Exhibit 1 - Development Review Committee Staff Report
 Development Review Committee - Exhibit 7 - CEQA Documents

Attachment 3 - City Planning Commission Report and Exhibits - April 05, 2018





KEYNOTES

1. PRIMARY ACCESSIBLE BUILDING ENTRY
2. BLUE GLAZING IN CLEAR ANODIZED ALUMINUM STOREFRONT.
3. PAINTED DOCK HIGH TRUCK LOADING DOOR.
4. PAINTED GRADE LEVEL TRUCK LOADING DOOR.
5. 3' X 7' PAINTED METAL MAIN DOOR. @ APPROXIMATELY 100' ON CENTER AROUND THE PERIMETER OF THE BUILDING.
6. PAINTED CONCRETE WALL WITH RECESSED SCORE LINES CAST IN PLACE.
7. DOWNSPOUTS ON NORTH AND SOUTH ELEVATIONS SHALL BE EXTERNAL.
8. DOWNSPOUTS AT THE FOR CORNERS SHALL BE INTERNAL.
9. PAINTED CONCRETE TRASH AND RECYCLE BIN ENCLOSURE. WALLS ARE 6' HIGH PINTED CONCRETE TILT-UP TO MATCH THE BUILDING. GATES ARE PATED STEEL. NOTE THAT THE TRASH ENCLOSURES ARE WITHIN THE SCREENED TRUCK COURT AND NOT VISIBLE FORM A PUBLIC WAY. ONE BIN IS DEDICATED FOR TRASH, AND ONE BIN FOR RECYCLE PRODUCTS.

FINISH SCHEDULE

1. FIELD COLOR: SHERWIN WILLIAMS SW 7014 ELDER WHITE
2. FIELD COLOR: SHERWIN WILLIAMS SW 7015 REPOSE GRAY
3. ACCENT COLOR: SHERWIN WILLIAMS 7016 MINDFUL GRAY
4. BASE FIELD ACCENT COLOR: SHERWIN WILLIAMS SW 7018 DOVETAIL
5. ACCENT COLOR: SHERWIN WILLIAMS SW 6206 OYSTER BAY
6. GLAZING: MONOLITHIC 1/4" MONOLITHIC 1/4" PPG SOLARCOOL PACIFICA REFLECTIVE #2 IN CLEAR ANODIZED ALUMINUM STOREFRONT. THE MAXIMUM ALLOWABLE REFLECTANCE OF GLASS SHALL BE 25%.

<http://www.mlg.com> • 951-787-9223

Exhibit 2b Project Elevations

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Development Review Committee - Exhibit 7 - CEQA Documents

Center Street Community Building
6055 Center Street, Riverside, California



Exhibit 3 Photographic Survey

Center Street Commerce Building
6055 Center Street, Riverside, California

Source: Site Visit on April 7, 2018 & Google Earth, 2015

<http://www.mig.com> • 951-731-9222



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Development Review Committee - Exhibit 7 - CEQA Documents



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②



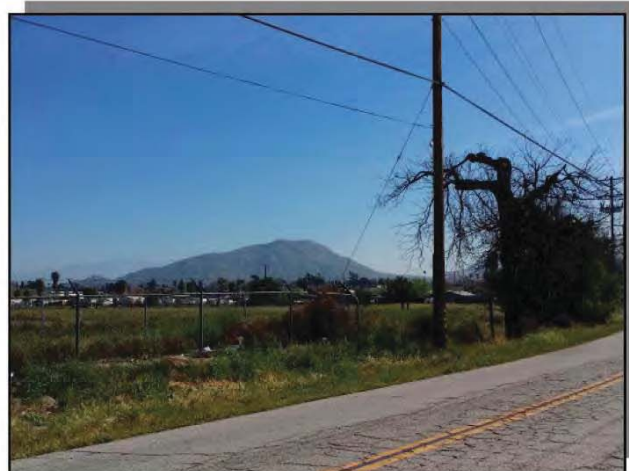
③



④



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Exhibit 3a Photographic Survey

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Planning Commission - Exhibit 1 - Development Review Committee Staff Report
 MIG Hogle-Ireland
 Development Review Committee - Exhibit 7 - CEQA Documents
 6550 Center Street, Riverside, California



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Exhibit 3b Photographic Survey

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Development Review Committee - Exhibit 7 - CEQA Documents

Center Street Commerce Building
6550 Center Street, Riverside, California



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Exhibit 3c Photographic Survey

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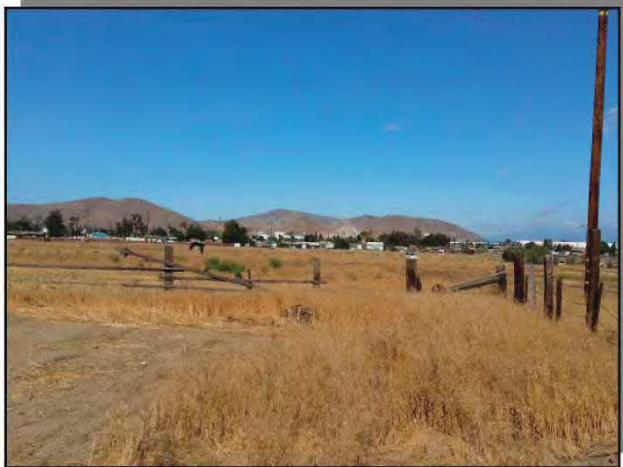
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Exhibit 3d Photographic Survey

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Center Street Conference Building
 6550 Center Street, Riverside, California



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Exhibit 3e Photographic Survey

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 City of Riverside, California
 6550 Center Street, Riverside, California

3 Determination

3.1 – 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 Resources	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Geology /Soils
☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials	☐	Hydrology / Water Quality
☐	Land Use / Planning	☐	Mineral Resources	☐	Noise
☐	Population / Housing	☐	Public Services	☐	Recreation
☐	Transportation/Traffic	☐	Utilities / Service Systems	☐	Mandatory Findings of Significance

3.2 – Determination

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

Signature

Date

City of Riverside

Printed Name & Title

4 Evaluation of Environmental Impacts

4.1 – Aesthetics

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within view from a state scenic highway?	☐	☐	☐	☒
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Less than Significant Impact. Scenic vistas can be impacted by development in two ways. First, a structure may be constructed that blocks the view of a vista. Second, the vista itself may be altered (i.e., development on a scenic hillside). The project site is primarily vacant with a vacant single family residence and five ancillary structures on the southeastern portion of the site and surrounded by material storage yards to the north, towing company to the east, AB Brown Sports Complex and vacant land to the south, and vacant land to the west. Varying views of the La Loma Hills to the north, Blue Mountain to the east, the Box Springs Mountains to the southeast, and Rattlesnake Mountain to the west are currently available from the project site. Views may be blocked with the development of the proposed project; however, the project is proposed within an area designated for business and manufacturing park uses and surrounding properties along Center Street are developed with similar uses. Riverside Municipal Code Chapter 19.130 requires that all development in the Business Manufacturing Park (BMP) zone have a maximum building height of 45 feet with an additional 10-foot allowance for any portion of the building intended for screening purposes. However, Municipal Code Chapter 19.560.030 establishes a 10-foot additional height exemption for screening of rooftop equipment. The proposed building will have a maximum height of 47 feet at the northern corners where screening will be provided to block views of rooftop equipment. The project site and vicinity are not designated by the City's General Plan for the preservation or uniqueness of scenic views.¹ Furthermore, the General Plan Environmental Impact Report (EIR) found that impacts to scenic vistas would be less than significant with implementation of General Plan's policies supporting a balance between development interests and broader community preservation objective. This project does not require a general plan amendment and is consistent with the policies of the B/OP land use designation. Considering the project will not directly alter a scenic vista and is consistent with the General Plan EIR analysis, impacts will be less than significant.

¹ City of Riverside. General Plan Environmental Impact Report. November 2007

b) **No Impact.** The project is not adjacent to a designated state scenic highway as identified on the California Scenic Highway Mapping System.² The project site is primarily vacant with a vacant single family residence and five ancillary structures. As discussed in Section 4.5 (Cultural Resources), this residence has been previously recorded as Site 33-006973 and is a 1920's era Spanish Eclectic-style single family residence. As determined by the Historical/Archaeological Resources Survey Report (Appendix D), the residence and five ancillary structures have undergone major alterations and are in dilapidated condition; therefore, they do not qualify as historical resources. The site does not contain rock outcroppings, significant trees, or other features that could qualify as a scenic resource. Considering no scenic resources are located on the project site or will be altered as a result of the project, no impact will occur.

c) **Less than Significant Impact.** Degradation of visual character or quality is defined by substantial changes to the existing site appearance through construction of structures such that they are poorly designed or conflict with the site's existing surroundings. Construction of the proposed building on the existing primarily vacant site would alter the existing visual character of the primarily vacant site. However, the project site is located in an area designated for business and office park use. Center Street is developed with similar uses with a warehouse building to the northeast, towing company to the east, and material storage yards to the north of the project site. The project will comply with all pertinent design requirements of the Zoning Code, to assure quality site design and building architecture that is well constructed. This includes installation of landscaping, undulating and decorative screening walls and facades, window fenestration, and varying roof design. Development of the proposed project will improve the overall character of the area by introducing a high-quality design and replacing dilapidated structures on the southeastern portion of the project site. The City of Riverside General Plan EIR 2025 states that City-wide design guidelines prevent the use of highly reflective surfaces and metal siding. The buildings will be of concrete tilt up panel style construction with architecturally enhanced main entrance and blue window glazing. With design features included, the project will have less than significant impacts on the visual character of the site and the surroundings.

d) **Less than Significant Impact.** Excessive or inappropriately directed lighting can adversely impact night-time views by reducing the ability to see the night sky and stars. Glare can be caused from unshielded or misdirected lighting sources. Reflective surfaces (i.e., polished metal) can also cause glare. Impacts associated with glare range from simple nuisance to potentially dangerous situations (i.e., if glare is directed into the eyes of motorists).

Development of the proposed project will require installation of outdoor lighting necessary for public safety and maintenance, as well as to accommodate nighttime business operations. All lighting will comply with the development standards contained in the City's Zoning Code (Title 19). Chapter 19.590 (Performance Standards) requires that on-site lighting be arranged as to reflect away from adjoining property or any public streets. Light shall not be directed skyward or in a manner that interferes with aircraft operation.

The proposed project could involve nighttime activities that would result in additional sources of light in the night. However, the project site is surrounded by material storage yards to the north, a towing company to the east, and the AB Brown Sports Complex to the south. There is currently substantial nighttime lighting in the surrounding areas of the project site due to surrounding developments and the general urban character of the area. There are no residential uses in close proximity to the project site that could be directly affected by new sources of light. Addition of new sources of permanent light and glare as a result of implementation of the proposed project would not significantly increase ambient lighting in the project vicinity. Moreover, due to the built nature of the project area, there is a significant existing amount of ambient light both in the project area and in the immediately surrounding vicinity. Impacts will be less than significant.

² California Department of Transportation. California Scenic Highway Mapping System. http://www.dot.ca.gov/hq/LandArch/scenic_highways/ [July 2015]

4.2 – Agriculture and Forest Resources

Would the project:

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

a) **No Impact.** As indicated in the California Department of Conservation Division of Land Resource Protection and the City of Riverside General Plan EIR, the project site is identified as *urban and built-up land* and *other land*.^{3 4} *Urban and built-up land* is defined as land that is occupied by structures with building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. *Other land* is identified as land that is not included in any other mapping category. Common examples include low density rural developments and vacant nonagricultural land surrounded on all size by urban development. In addition, the project site is not designated or zoned for agricultural use according to the General Plan and Zoning Map. Therefore, the proposed project will not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No impact will result.

b) **No Impact.** As indicated by the 2007 Riverside General Plan EIR and the Department of Conservation Division of Land Resource Protection, the project site is not identified as being on Williamson Act enrolled land.^{5 6} In addition the project is

³ California Department of Conservation. Division of Land Resource Protection. Farmland Mapping and Monitoring Program. [July 2013]

⁴ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

⁵ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

currently zoned as Business Manufacturing Park which designates the site for industrial use. Therefore, there will be no conflict with existing zoning for agricultural use or a Williamson Act contract and impacts will be no impacts.

c) **No Impact.** Public Resources Code Section 12220(g) identifies forest land as 'land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.' The project site and surrounding properties are not currently being managed or used for forest land as identified in Public Resources Code Section 12220(g). The project site is zoned for industrial uses, with disturbed/ruderal vegetation as well as native and ornamental vegetation onsite. Therefore, development of this project will have no impact to any timberland zoning.

d) **No Impact.** The project site is primarily vacant with one single family residence and five ancillary structures on site. The project site is not being managed or used for forest land and is not zoned for forest land use; thus, there will be no loss of forest land or conversion of forest land to non-forest use as a result of this project.

e) **No Impact.** The project site is primarily vacant with a vacant single family residence and five ancillary structures, disturbed/ruderal habitat, and native and ornamental vegetation on site. The project is surrounded by material storage yards to the north, towing company to the east, the AB Brown Sports Complex and vacant land to the south, and vacant land to the west with little to no trees. None of the surrounding sites contain existing forest uses. Development of this project will not change the existing environment in a manner that will result in the conversion of forest land to a non-forest use.

⁶ California Department of Conservation. Division of Land Resource Protection. <http://ftp.consrv.ca.gov/pub/dlrp/wa/> [June 2015]

4.3 – Air Quality

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐
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)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

a) **Less than Significant Impact.** A significant impact could occur if the proposed project conflicts with or obstructs implementation of the South Coast Air Basin 2012 Air Quality Management Plan (AQMP). Conflicts and obstructions that hinder implementation of the AQMP can delay efforts to meet attainment deadlines for criteria pollutants and maintaining existing compliance with applicable air quality standards. Pursuant to the methodology provided in Chapter 12 of the 1993 South Coast Air Quality Management District (SCAQMD) CEQA Air Quality Handbook, consistency with the South Coast Air 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.⁷ A consistency review is presented below:

1. The project would result in short-term construction and long-term pollutant emissions that are less than the CEQA significance emissions thresholds established by the SCAQMD, as demonstrated in Section 4.3(b) et seq of this report; 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.
2. The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and *significant projects*. *Significant projects* include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling districts, water ports, solid waste

⁷ South Coast Air Quality Management District. CEQA Air Quality Handbook. 1993

disposal sites, and off-shore drilling facilities; therefore, the proposed project is not defined as *significant*. This project does not include a General Plan Amendment and therefore does not required consistency analysis with the AQMP.

Based on the consistency analysis presented above, the proposed project will not conflict with the AQMP.

b) **Less than Significant Impact with Mitigation Incorporated.** A project may have a significant impact if project related emissions would exceed federal, state, or regional standards or thresholds, or if project-related emissions would substantially contribute to existing or project air quality violations. The proposed project is located within the South Coast Air Basin, where efforts to attain state and federal air quality standards are governed by the SCAQMD. Both the State of California (State) and the Federal government have established health-based ambient air quality standards (AAQS) for seven air pollutants (known as 'criteria pollutants'). These pollutants include ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), inhalable particulate matter with a diameter of 10 microns or less (PM₁₀), fine particulate matter with a diameter of 2.5 microns or less (PM_{2.5}), and lead (Pb). The state has also established AAQS for additional pollutants. The AAQS are designed to protect the health and welfare of the populace within a reasonable margin of safety. Where the state and federal standards differ, California AAQS are more stringent than the national AAQS.

Air pollution levels are measured at monitoring stations located throughout the air basin. Areas that are in nonattainment with respect to federal or state AAQS are required to prepare plans and implement measures that will bring the region into attainment. Table 2 (South Coast Air Basin Attainment Status) summarizes the attainment status in the Basin for the criteria pollutants. Discussion of potential impacts related to short-term construction impacts and long-term area source and operational impacts are presented below.

Table 2
South Coast Air Basin Attainment Status

Pollutant	Federal	State
O ₃ (1-hr)	--	Nonattainment
O ₃ (8-hr)	Nonattainment	Nonattainment
PM ₁₀	Attainment	Nonattainment
PM _{2.5}	Nonattainment	Nonattainment
CO	Unclassified/Attainment	Attainment
NO ₂	Unclassified/Attainment	Attainment
SO ₂	Attainment	Attainment
Pb	Nonattainment	Attainment
VRP	--	Unclassified
SO ₄	--	Attainment
H ₂ S	--	Unclassified
Sources: ARB 2013		

Construction Emissions

Short-term criteria pollutant emissions will occur during demolition, site grading, building construction, paving, and architectural coating activities. Emissions will occur from use of equipment, worker, vendor, and hauling trips, and disturbance of onsite soils (fugitive dust). To determine if construction of the proposed project could result in a significant air quality impact, the California Emissions Estimator Model (CalEEMod) has been utilized. CalEEMod defaults have generally been used as construction inputs into the model (see Appendix A). The methodology for calculating emissions is included in the CalEEMod User Guide, freely available at <http://www.caleemod.com>.

Table 3 (Daily Construction Emissions (lbs/day)), shows the results of the CalEEMod model for summer and winter construction impacts. It was estimated that 7,416 square feet of existing, on-site structures will be demolished to accommodate the project. Construction of the building is anticipated to start in early 2016. CalEEMod defaults for construction schedule phase duration and equipment needs were utilized. Based on the results of the model, maximum daily emissions from the construction of the project will result in excessive emissions of volatile organic chemicals (identified as reactive organic gases) associated with interior and exterior coating activities. To compensate for excessive VOC emissions from coating activities, the model includes use of a minimum 37 grams per liter (g/l) VOC content for interior and exterior coatings. Use of low-VOC coatings during construction activities will reduce VOC emissions to 73 lbs/day, less than the threshold established by SCAQMD.

Table 3
Daily Construction Emissions (lbs/day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
<i>Summer</i>						
2016	7	75	50	<1	21	13
2017	72	37	45	<1	6	3
<i>Winter</i>						
2016	7	75	50	<1	21	13
2017	72	37	46	<1	6	3
Threshold	75	100	550	150	150	55
Substantial?	No	No	No	No	No	No

Operational Emissions

Long-term criteria air pollutant emissions will result from the operation of the proposed project. Long-term emissions are categorized as area source emissions, energy demand emissions, and operational emissions. Operational emissions will result from automobile, truck, and other vehicle sources associated with daily trips to and from the project. Area source emissions are the combination of many small emission sources that include use of outdoor landscape maintenance equipment, use of consumer products such as cleaning products, and periodic repainting of the proposed project. Energy demand emissions result from use of electricity and natural gas. Emissions from area sources were estimated using CalEEMod defaults.

The California Emissions Estimator Model (CalEEMod) was utilized to estimate mobile source emissions. Trip generation (3.82 daily trips per 1,000 SF) is based on the trip generation rates provided in the Institute of Transportation Engineers *Trip Generation Manual* (9th Edition).⁸ Passenger vehicles will consist of 74.4 percent of the fleet mix, light-duty trucks will consist of 8.4 percent of the fleet mix, medium-heavy duty trucks will consist of 4.6 percent of the truck trips, and heavy-heavy duty truck trips consist of 16.6 percent of the fleet mix. CalEEMod defaults were used for trip length, prime and no-prime trip percentages, and trip purpose in light of the proposed project being assessed as manufacturing use. It was assumed that the facility will use five forklifts and one generator set during operations. Assuming an opening year of 2019, the results of the CalEEMod model for summer and winter operation of the project are summarized in

Table

4

Operational Daily Emissions (lbs/day)). Based on the results of the model, impacts associated with operation of the Project will not exceed the threshold established by SCAQMD. However, should future use of the project include a refrigerated warehouse component, Mitigation Measure AQ-1 has been incorporated to require a new Air Quality and Climate Change Assessment to take into account impacts associated with operation of a refrigerated warehouse and ensure no significant impacts will occur.

⁸ Institute of Transportation Engineers. *Trip Generation Manual*. 9th ed. September 2012

Mitigation Measures

- AQ-1** If a refrigerated use is proposed for future operation of the development, the applicant shall prepare a new Air Quality and Climate Change Assessment to analyze any new or increased potential impacts of a refrigerated use and determine the significance of potential impacts.

Table 4
Operational Daily Emissions (lbs/day)

Source	ROG	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
<i>Summer</i>						
Area Sources	16	<1	<1	0	<1	<1
Energy Demand	<1	3	2	<1	<1	<1
Mobile Sources	4	31	55	<1	12	3
Equipment	1	11	10	<1	2	1
<i>Summer Total</i>	22	45	67	<1	13	4
<i>Winter</i>						
Area Sources	16	<1	<1	0	<1	<1
Energy Demand	<1	3	2	<1	<1	<1
Mobile Sources	4	33	58	<1	12	3
Equipment	1	11	10	<1	2	1
<i>Winter Total</i>	22	46	70	<1	13	4
Threshold	55	55	550	150	150	55
Substantial?	No	No	No	No	No	No

- c) **Less than Significant Impact.** Cumulative short-term, construction-related emissions from the project will not contribute considerably to any potential cumulative air quality impact because short-term project emissions will be less than significant and other concurrent construction projects in the region will be required to implement standard air quality regulations and mitigation pursuant to State CEQA requirements, just as this project has.

The SCAQMD CEQA Air Quality Handbook identifies methodologies for analyzing long-term cumulative air quality impacts for criteria pollutants for which the Basin is nonattainment. These methodologies identify three performance standards that can be used to determine if long-term emissions will result in cumulative impacts. Essentially, these methodologies assess growth associated with a land use project and are evaluated for consistency with regional projections. These methodologies are outdated, and are no longer recommended by SCAQMD. SCAQMD allows a project to be analyzed using the projection method such that consistency with the AQMP will indicate that a project will not contribute considerably to cumulative air quality impacts. As discussed in AQMP Consistency, the proposed project is consistent with growth assumptions in the AQMP, and would not exceed any applicable SCAQMD thresholds for short- and long-term emissions. Therefore, the proposed project will not contribute to any potential cumulative air quality impacts.

- d) **Less than Significant Impact.** Sensitive receptors are those segments of the population that are most susceptible to poor air quality such as children, the elderly, the sick, and athletes who perform outdoors. Land uses associated with sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes.

Localized Significance Thresholds

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. Construction-related criteria pollutant emissions and potentially significant localized impacts were evaluated pursuant to the SCAQMD Final Localized Significance Thresholds Methodology. This methodology provides

screening tables for one through five-acre project scenarios, depending on the amount of site disturbance during a day using the Fact Sheet for equipment usage in CalEEMod.⁹ Daily oxides of nitrogen (NO_x), carbon monoxide (CO), and particulate matter (PM₁₀ and PM_{2.5}) emissions will occur during construction of the project, grading of the project site, and paving of facility parking lots and drive aisles. Table 5 (Localized Significance Threshold Analysis (lbs/day)) summarizes on- and off-site emissions as compared to the local thresholds established for Source Receptor Area (SRA) 23 (Metropolitan Riverside County). Based on the use of four tractors and three dozers during site preparation activities, a 3.5-acre threshold will be used (using linear regression). A 50-meter receptor distance was used to reflect the proximity of residential uses to the sports fields south of the project site. Note that particulate matter emissions account for daily watering required by SCAQMD Rule 403 (three times per day for a 55 percent reduction in fugitive dust). Emissions from construction activities will not exceed any localized threshold.

Table 5
Localized Significance Threshold Analysis (lbs/day)

Phase	CO	NO _x	PM ₁₀	PM _{2.5}
Demolition	35	46	2	2
Site Preparation	41	55	10	7
Grading	49	75	7	5
Building Construction	19	29	2	2
Paving	15	20	1	1
Architectural Coating	2	2	<1	<1
Threshold	1,708	248	28	8
Potentially Substantial?	No	No	No	No

Operational

Operation-related STs become a concern when there are substantial on-site stationary and on-site mobile sources that could impact surrounding receptors. The proposed building does not have a tenant and is speculatively considered for manufacturing uses, thus the type and extent of on-site stationary or on-site mobile sources is unknown. In order to generally assess operational impacts related to LSTs, the ARB *Characterization of the Off-Road Equipment Population* for the state was used to estimate the amount of on-site equipment that may be used as part of future operations. The “residual” category of business was queried. This category includes manufacturing uses as the result of survey inquiries throughout the state and extrapolated to the County level. According to this report, manufacturing uses in Riverside County average 0.0313 pieces of equipment per employee. An estimate of 106 employees was calculated for the proposed project based on the NAIOP logistics trends analysis for industrial and warehousing uses. This results in an estimated six pieces of equipment, specifically, five fork-lifts and one generator set. It is standard practice to operate a generator once a month for approximately one hour for maintenance purposes and this practice was considered in the analysis. According to Southern California Edison, the Ontario District (that includes parts of western Riverside County), the area experiences an average of 100 minutes of “sustained” outages (from 2010 through 2015 for outages over five minutes in duration) at a frequency of 0.81 outages annually. Using a composite of this information, the generator set was assumed to operate for a total of 13.35 hours annually. Forklifts were assumed to operate 24 hours a day. Use of on-site equipment coupled with on-site truck idling (limited to five minutes per hour) comprises the on-site emissions inventory that were evaluated for localized impacts. The emissions calculations are summarized in Table 6 (Localized Singificance Thresholds (Operations)) and no criteria pollutant will be emitted that will exceed applicable LSTs.

Table 6
Localized Significance Thresholds (Operations)

Source	CO	NO _x	PM ₁₀	PM _{2.5}
Landscaping	0.04	0.00	0.00	0.00

⁹ South Coast Air Quality Management District. Fact Sheet for Applying CalEEMod to Localized Significance Thresholds.

Natural Gas	2.31	2.75	0.21	0.21
On-Site Idling	0.23	1.78	00.00	0.00
On-Site Equipment	1.36	5.07	0.38	0.35
TOTAL	3.94	9.6	0.59	0.56
Potentially Significant?	No	No	No	NO

Carbon Monoxide Hot Spots

A carbon monoxide (CO) hotspot is an area of localized CO pollution that is caused by severe vehicle congestion on major roadways, typically near intersections. CO hotspots have the potential to violate State and Federal CO standards at intersections, even if the broader Basin is in attainment for Federal and State levels. The California Department of Transportation Project-Level Carbon Monoxide Protocol (Protocol) screening procedures have been utilized to determine if the proposed project could potentially result in a CO hotspot. Based on the recommendations of the Protocol, a screening analysis should be performed for the proposed project to determine if a detailed analysis will be required. The California Department of Transportation notes that because of the age of the assumptions used in the screening procedures and the obsolete nature of the modeling tools utilized to develop the screening procedures in the Protocol, they are no longer accepted. More recent screening procedures based on more current methodologies have been developed. The Sacramento Metropolitan Air Quality Management District (SMAQMD) developed a screening threshold in 2011 which states that any project involving an intersection experiencing 31,600 vehicles per hour or more will require detailed analysis. In addition, the Bay Area Air Quality Management District developed a screening threshold in 2010 which states that any project involving an intersection experiencing 44,000 vehicles per hour would require detailed analysis. The proposed project's operations would not involve an intersection experiencing this level of traffic; therefore, the proposed project passes the screening analysis and impacts are deemed less than significant. Based on the local analysis procedures, the proposed project would not result in a CO hotspot.

Toxic Air Contaminants

SCAQMD has established thresholds for emissions of toxic air contaminants. Toxic air emissions from a project are considered potentially significant if maximum incremental cancer risk (MICR) is greater than ten persons in 1,000,000 (1E-05). Cancer risk is determined by calculating the combinatory effects of the cancer potency factor (CPF) when inhaling the toxic, the daily inhalation dose, the age group the receptor is cohort to, the duration of exposure over a lifetime (25, 30, or 70 years depending on the analysis), and the amount of time spent at the location of exposure. Cancer risk was assessed for three specific locations within one-quarter mile of the proposed project, as recommended by OEHHA: the maximum exposed individual resident (MEIR) over a 30-year exposure duration that characterizes the maximum residency tendency in California, the maximum exposed individual worker (MEIW) over a 25-year exposure duration characterizing the maximum job tenure tendency in California, and the point of maximum impact (PMI) irrespective of receptor type. Residential risk calculations account for presumed sensitivity to carcinogens and differences in intake rates for the third-trimester to birth, birth to two-years, two-years to nine-years, two-years to nine-years, two-years to 16-years, 16-year to 30-years, and 16-years to 70 years' age bins.

Concentrations were modeled using AERMOD and then input into the Hot Spots and Reporting Program (HARP) Health Risk Assessment Standalone Tool (RAST) computer software to calculate cancer risk based on the methods and recommendations found in the HRA Guidelines. The results of the HARP evaluation of cancer risk for residential 9-years, 30 years, and 70 years, and worker 25-years exposure scenarios for grid receptors and discrete receptors are summarized in the following tables and detailed program results are included in the project health risk assessment.

The breadth of averaging options was included in this study to provide the broadest depth of information regarding cancer risk to the public and local decision makers. In regards to the health risk assessment and CEQA, identifying the MICR is based on the greater of the MEIW and MEIR using the appropriate scenario for those receptors categories and PMI is assessed through community exposure. The lifetime exposure scenario is appropriate for determining cancer burden in those areas that may be exposed to cancer risk greater than one in one million cases. Evaluation of these scenarios will

identify any receptors that exceed the MICR of 10 in one million or the 0.5 increased cancer burden thresholds promulgated by SCAQMD.

The site of the MEIR is the residential dwelling unit located at 3610 Placentia Lane, east of the project site. The incremental increase in cancer risk at this property is 2.87 in one million. The location of the MEIW is at the Brothers Towing of Riverside site directly east of the project site at 3655 Placentia Ln. The incremental increase in cancer risk at this business is 1.09 in one million. MICR at these locations does not exceed 10 in one million.

Cancer burden is the product of public cancer risk and the population exposed to the carcinogen. There are 25 residential properties located within ¼-mile of the project site. Census data indicates that the average owner-occupied household size in the city is 3.10 persons per dwelling unit, thus, an estimated population of 78 people live within one-quarter mile of the project site. The average cancer risk based on the lifetime exposure scenario is 3.34E-06 (approximately 3.34 cases per million people). The product of the cancer risk and the estimated population is 0.0003. This does not exceed the SCAQMD threshold of 0.5 excess cancer cases. Under a worst-case scenario, the PMI calculated as cancer burden of 0.0025 cases is located at the Brothers Towing of Riverside site. Under neither scenario would cancer burden exceed the applicable threshold.

The AB Brown Sports Complex, located directly southeast of the project site on the south side of Placentia Street, is of particular concern to the City and the community as it relates to toxic emissions from the project site. The Sports Complex was input into CalEEMod as a residential use although children, parents, and other users will spend less time at the Sports Complex than they do at home or other residential units. It's estimated that the children will spend approximately 2-8 hours a week at the Sports Complex, depending on the age group and competitive nature of the activities. This is between 92 percent and 66 percent less than when at home. DPM concentrations over the Sports Complex will range from 0.00067 to 0.00759 grams per second per square-meter (g/sec/m²) with an average concentration of 0.001811 g/sec/m². This will result in a potential increase in cancer risk of 0.58 persons per million (5.80E-07) and 6.57 persons per million (6.57E-06) with an average of 1.57 persons per million. To put these estimates in perspective and consider cancer risk from a different perspective, a child who spends four hours a week at the Sports Complex would have need to continue to engage in activities there for approximately 2,948 years before the amount of exposure would reach 10 chances in one million of developing cancer. Based on the evidence provided in the project HRA and the discussion in this Initial Study, impacts to users of the AB Brown Sports Complex will be less than significant.

Chronic non-cancer risks are considered significant if the project toxic air contaminant emissions result in a hazard index greater than or equal to one. The hazard index is determined by calculating the average annual toxic concentration (µg/m³) divided by the reference exposure level (REL) for a particular toxic. The REL is the concentration at which no adverse health impacts are anticipated and is established by OEHHA. The chronic REL for DPM was established by OEHHA as 5 µg/m³. Chronic non-cancer risk was evaluated using HARP and identified the highest hazard index or 0.00712, identified as Index 76 of the lifetime receptor grid. This does not exceed the hazard index threshold of one promulgated by SCAQMD. Table 7 (Summary Risk Assessment) summarizes the results of the risk assessment and indicate that no thresholds of significance will be exceeded. Impacts will be less than significant.

Table 7
Summary Risk Assessment

Receptor (Exposure Time)	Exposure Level	Threshold	
Resident (30 Years) Cancer Risk	0.000002870	0.00001	No
Worker (25 Years) Cancer Risk	0.000001090	0.00001	No
Community Level (70 Years) Cancer Risk	0.002500000	0.50000	No
Non-Cancer Hazard index	0.007120000	1.00000	No

e) **No 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 project is sited within an existing industrial and commercial area. The

proposed project does not produce odors that would affect a substantial number of people considering that the proposed project will not result in heavy manufacturing activities. No impact will occur.

4.4- **Biological Resources**

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
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?	☐	☐	☐	☒
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

a) Less than Significant Impact with Mitigation Incorporated. A biological resources assessment was prepared by MIG | Hogle-Ireland (see Appendix C). No special-status plant or wildlife species listed by the State and/or Federal government as endangered or threatened were identified during the field investigation conducted by MIG | Hogle-Ireland on April 7, 2015.

The coastal whiptail (*Aspidoscelis tigris stejnegeri*), coast horned lizard (*Phrynosoma blainvillii*), and California horned lark (*Eremophila alpestris actia*) have a moderate potential to occur on the project site. Suitable habitat for the coastal whiptail and coast horned lizard exists in the form of disturbed/ruderal habitat which provides open areas and sandy soil. Suitable habitat for the California horned lark exists in the form of disturbed/ruderal habitat that provides open grassy areas. The Coastal whiptail and the California horned lark have no legal protection status; however, the coast horned lizard is a California "Species of Special Concern". In order to avoid potential impacts to nesting birds during construction activities, Mitigation Measures BIO-1 and BIO-2 have been incorporated. Mitigation Measure BIO-1 requires that all suitable habitats be thoroughly surveyed if construction activity and construction noise would occur during the avian nesting season (prior to February 1 or after September 1) no more than five days before commencement of vegetation removal. In the event that the project site is occupied by nesting birds, Mitigation Measure BIO-2 prohibiting grading or heavy equipment activity within 300 feet of sensitive bird nests, 500 feet of raptor nests, or as determined by a qualified biologist shall be incorporated. With implementation of Mitigation Measures BIO-1 and BIO-2, impacts to the coast horned will be reduced to less-than-significant levels.

The City of Riverside indicated that, according to the Western Riverside County Multi-Species Habitat Conservation Plan (MSHCP), the project site is within a burrowing owl survey area and burrowing owls may be present on site. The April 7, 2015 biological field survey revealed that the project site is comprised of ruderal and disturbed plant communities. Burrowing owls and/or signs of this species (e.g., whitewash at burrows) were not observed during the April 7, 2015 biological field survey. Due to the absence of suitable burrow habitat, burrowing owl has a low potential to occur on the project site. Impacts to burrowing owls will be less than significant.

Existing trees on the project site could support suitable nesting habitat for songbirds. Although no active nests were observed during the 2015 field surveys, there is potential for ground-, tree-, and shrub-nesting birds to establish nests on the project site in the future. Incorporation of Mitigation Measures BIO-1 and BIO-2 requiring thorough surveys of the construction area and the establishment of a buffer area around active nests, respectively, will reduce impacts to migratory songbirds to less-than-significant levels.

Several species of bats are known to occur in the vicinity of the project site. Several sheds, mobile homes, and trees are located on the project site that could provide suitable roosting habitat for bat species. Thus, Mitigation Measure BIO-3, requiring a pre-construction survey of suitable habitat for roosting bats within 14 days prior vegetation or structure removal be conducted, has been incorporated. Should an occupied maternity or colony roost be detected during the pre-construction survey, CDFW shall be contacted about how to proceed. With incorporation of Mitigation Measure BIO-3, impacts to roosting bats will be reduced to less-than-significant levels.

Mitigation Measures

BIO-1 To avoid impacts to nesting birds, construction activities and construction noise should occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occurs within the avian nesting season (during the period from February 1 to September 1), all suitable habitats shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the project site is occupied by nesting birds, Mitigation Measure BIO-2 shall apply. Conversely, if the project site is found to be absent of nesting birds, Mitigation Measure BIO-2 shall not be required.

BIO-2 If pre-construction nesting bird surveys result in the location of active nests, no grading or heavy equipment activity shall take place within 300 feet of sensitive bird nests and 500 feet of raptor nests, or as determined by a

qualified biologist. Protective measures (e.g., sampling) shall be required to ensure compliance with the MBTA and relevant California Fish and Game Code requirements.

BIO-3 A pre-construction survey shall be conducted in suitable habitat (e.g., dilapidated sheds and trees) for roosting bats within 14 days prior to activities that remove vegetation or suitable structures. If an occupied maternity or colony roost is detected, CDFW shall be contacted about how to proceed. Typically, a bigger exclusion zone would be established around each occupied roost until bat activities have ceased. The size of the buffer would take into account:

- Proximity and noise levels of project activities;
- Distance and amount of vegetation or screening between the roost and construction activities;
- Species-specific needs, if known, such as sensitivity to disturbance.

Due to restrictions of the California Health Department, direct contact by workers with any bat is not allowed. The qualified bat biologist will be contacted immediately if a bat roost is discovered during project construction.

b) **No Impact.** The April 7, 2015 biological field survey revealed that ornamental vegetation, native vegetation, developed, and disturbed/ruderal habitats exist on the 15.63-acre project site. No sensitive natural vegetation communities or riparian habitat are present on the project site. As such, no impact to riparian habitat or other sensitive natural vegetation communities will occur.

c) **Less than Significant Impact.** No jurisdictional waters were observed on the project site during the April 7, 2015 field visit. Therefore, no impacts to jurisdictional aquatic resources will occur due to project implementation.

The project could have indirect impacts (e.g., inadvertent damage by construction equipment or decreased water/habitat quality due to runoff) on sensitive natural communities downstream or in the vicinity of the project site. However, with implementation of the project Storm Water Pollution Prevention Plan (SWPPP), including Best Management Practices, these impacts would be reduced to less than significant.

d) **No Impact.** The project site is primarily urban and is not located within an established or potential wildlife movement corridor due to the heavily developed character of the vicinity. As discussed in the project Biological Resources Assessment, land uses bordering the project site include commercial and industrial facilities to the north, west, and east (e.g., multiple towing companies), and recreational uses to the south (i.e., A.B. Brown Sports Complex Park). Therefore, the movement of wildlife species at the project site is substantially limited due to the habitat fragmentation caused by development and the project site does not serve as a continuous regional connection for wildlife species. In addition, the project site is outside of any species movement corridors identified by local or regional plans. Additionally, the project is not in a known wildlife nursery site. No impact will occur.

e) **No Impact.** The City of Riverside General Plan 2025 contains an Open Space and Conservation Element. The following objectives and policies pertain to the protection of biological resources.

Objective OS-5 Protect biotic communities and critical habitats for endangered species throughout the General Plan Area.

Policy OS-5.2 Continue to participate in the MSHCP Program and ensure all projects comply with applicable requirements.

The City of Riverside does have a tree preservation ordinance; however, the proposed project does not proposed the removal of any trees. Therefore, project implementation will not conflict with any local policies or ordinances pertaining to biological resources. No impact will occur.

f) **Less than Significant 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 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 MSHCP identifies that the project area is located in a burrowing owl and narrow endemic plant species (i.e., San Diego ambrosia (*Ambrosia pumila*), Brand's star phacelia (*Phacelia stellaris*), and San Miguel Savory (*Clinopodium chandleri*)) survey area. Therefore, as required, surveys were conducted to assess potential habitat and to ensure that no burrowing owl or narrow endemic plant species have potential to occur on the project site. The biological field survey conducted on April 7, 2015 revealed that no suitable burrowing owl habitat exists on the project site. In addition, no habitat that could support narrow endemic plant species was observed on the project site during the biological field survey. The project will comply with measures identified in the MSHCP and will not conflict with the MSHCP. Impacts will be less than significant with implementation of standard MSHCP measures.

4.5- Cultural Resources

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in '15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to '15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

a) **Less than Significant Impact.** A Historical/Archaeological Resources Survey Report (Appendix D) was prepared by CRM Tech in June 2015 in which the cultural setting of the area is provided. In addition, historical research and a field survey were conducted.

Records Search

According to Eastern Information Center (EIC) and Archaeological Information Center (AIC) records, the project area had not been surveyed systematically for cultural resources prior to the Historical/Archaeological Resources Survey conducted by CRM Tech but was included in the scope of a large-scale archaeological sensitivity assessment conducted in 2003. Based on background research and a reconnaissance-level field survey, that study concluded that undeveloped or sparsely developed land in the project vicinity – i.e., along the Santa Ana River – should be considered sensitive for archaeological resources from both the prehistoric and the historic periods.

Outside the project boundaries but within a one-mile radius, AIC and EIC records show more than 40 other previous studies covering various tracts of land and linear features. As a result of these and other similar studies in the vicinity, seven prehistoric sites, 27 historic-period sites, three “pending” sites, and five isolates – i.e., localities with fewer than three artifacts – were previously identified within the scope of the records search. One of the historic-period sites, designated 33-006973, represents a residence at 3667 Placentia lane, which is located within the project area on APN 246-070-002. Described as being “typical of smaller houses in the Mediterranean/Spanish Revival style,” the residence was recorded in 1982 during a countywide cultural resources reconnaissance sponsored by the Riverside County Historical Commission.

All of the prehistoric sites recorded within the one-mile radius consisted of bedrock-milling features clustered around the La Loma Hills to the northeast of the project location. The historic-period sites, including the “pending” sites, comprised single-family residences, irrigation canals, wells, and refuse scatters. Of the five isolates, three were prehistoric groundstone artifacts and two were historic-period refuse items. Site 33-006973 will be discussed further below. None of the other recorded cultural resources were located within or adjacent to the project area and thus none of them required further consideration in the Historical/Archaeological Resources Study.

Historical Research

As mentioned above, La Placita de Los Trujillos, the community that the project location is traditionally considered a part of, was established in 1845, destroyed by a flood in 1862, and subsequently rebuilt on higher ground. The re-born village of La Placita extended across both sides of the line between San Bernardino and Riverside Counties when the latter county was created in 1893. In the 1890s, a total of 19 houses were known to be in the Riverside County portion of the village, mostly to the east of the project area and scattered along present-day Orange Street. By 1905, however, the Spanish-speaking community of La Placita had lost much of its separate community character.

Archival records of the Riverside County Assessor's Office reveal that development first occurred in the project area around 1912 when owner Henry Camp was assessed \$50 for improvements on APN 246-070-002, the only parcel in the project to have been taxed for improvement value. The 1982 California Historical Resources Inventory site record for Site 33-006793 (on file at the Eastern Information Center, University of California, Riverside) estimated that the main residence on that parcel (Site 33-006973) was built in 1922 but a significant increase in improvement value between 1924 and 1926 suggests a more likely construction date in the mid-1920s when the parcel was under the ownership of C.G. Martini. In any case, two buildings were known to be present at the location of Site 33-006973 on the north side of Placentia Lane by the mid-1930s when Martha Milford was listed as the property owner.

According to local directories, neither Martini nor Milford appears to have resided at this location. In fact, of the owners listed, only three were found in local directories, namely Densmore, Field, and Martini, and among these only Densmore was listed as a resident at this address. The density of development in the La Placita area gradually increased during the ensuing decades but despite being annexed by the City of Riverside in 1990, the rural character of the project vicinity has remained largely unchanged to the present time.

Field Survey

The field survey of the project area confirmed that the building previously recorded as Site 33-006973, a 1920s-era Spanish Eclectic-style single-family residence, remains in existence in the project area at 3667 Placentia Lane. During the field survey, this one-story stucco building was found to be suffering the effects of neglect, including boarded windows, crumbling stucco and concrete, missing roof tiles, and evidence of efflorescence stemming from rainwater runoff. It is no longer occupied.

Located behind the main residence is a garage of the same design and constructed of similar materials, along with a secondary residence. The secondary residence is a wood-framed, single-story building of vernacular character, featuring stucco walls, steel-framed windows, and a medium-pitched front-gable roof sheathed with composition sheet. This building is occupied. Three ancillary buildings are located to the west of the two residences and the garage, including a metal barn, a wooden shed, and a partially collapsed animal hutch. All of the buildings are in a dilapidated condition.

All six buildings in this group are situated on APN 246-070-002. Since they all appear to be at least 45 years old and share a common property history, Site 33-006973 was expanded to include the five newly recorded buildings. No other buildings, structures, objects, sites, features, or artifact deposits more than 45 years of age were encountered within the project boundaries. Site 33-006973, therefore, represents the only potential "historical resource" in the project area.

Site Evaluation

Site 33-006973, as re-recorded during the Historical/Archaeological Resources Survey (Appendix D), consists of a mid-1920s Spanish Eclectic-style single-family residence and five associated buildings including a secondary residence, a garage, a metal barn, a wooden shed, and an animal hutch. All of the buildings have been altered to some extent but they still exhibit a recognizable level of historical characteristic.

The construction of these buildings post-dates the era when the area retained an independent community identity as the Spanish-speaking village of La Placita, or "Spanishtown," and is more closely associated with a time when the area

underwent a prolonged period of slow, agrarian growth as a sparsely populated outskirts of Riverside. The buildings at Site 33-006973 belong to property types reflective of this episode in local history and retain sufficient historic integrity to relate to that period but they do not demonstrate a particularly close or important association with this pattern of events, or with any other established historic themes.

The historical background research has not identified any persons or specific events of recognized historic significance in close association with these buildings, nor has any prominent architect, designer, or builder been identified in their construction history. In terms of architectural or aesthetic merits, these buildings represent designs and building practices that are common among properties of similar types and vintages and none of them constitutes an important example of any style, type, period, region, or method of construction, nor do they embody any particular architectural ideals or artistic pursuits.

There is a single, potentially historic resource known as the Trujillo Adobe located at 3669 Center Street, approximately one-quarter mile northeast of the proposed Project Site, situated northwest of the intersection of Orange Street and Center Street. The adobe was constructed circa 1862 and it is currently being evaluated by the City for historic status and potential preservation. The Adobe is located outside of the project boundaries and will not be modified or otherwise disturbed by construction or operation of the proposed building.

Based on these considerations, the Historical/Archaeological Resources Survey determined that Site 33-006973 is listed as Riverside County Landmark RIV009 (1967), State of California Point of Interest P-75 (1968), and in the City's Historical Register as Historical Landmark #130. Therefore, the site meets the definition of a "historical resource" as provided by CEQA and associated regulations. Impacts will be less than significant. However, as is shown in Section 4.12 (Noise) of this report, construction vibration impacts will not significantly impact the Trujillo Adobe. Moreover, the proposed project site is located more than a quarter mile from the adobe and is zoned for Business and Manufacturing uses and is not designated in the City's General Plan as a location of recognized historical significance. As such, impacts will be less than significant.

b) **Less than Significant Impact with Mitigation Incorporated.** The project site will not involve import or export of soil. According to the Riverside General Plan EIR, the project site is located in an area with unknown archaeological sensitivity. CRM Tech conducted a records search and consulted with Native American groups as part of the Historical/Archaeological Resources Survey.

In response to CRM Tech's inquiry, the Native American Heritage Commission (NAHC) reports in a letter dated March 17, 2015, that the sacred lands record search identified no Native American cultural resources within the project area, but recommends that local Native American groups be contacted for further information. For that purpose, the commission provided a list of potential contacts in the region.

Upon receiving the NAHC's response, CRM Tech sent written requests for comments to all 23 individuals on the referral list and the organizations they represent. In addition, as referred by these tribal representatives or appropriate tribal government staff, the following individuals were also contacted:

- Rob Roy, Environmental Director, La Jolla Band of Luiseno Indians;
- Raymond Huaute, Cultural Resource Specialist, Morongo Band of Mission Indians;
- Jim McPherson, Manager, Culture Resources Department of the Rincon Band of Luiseno Indians.

As of the time of the survey, three of the tribal representatives contacted have provided written responses. In a letter dated March 23, 2015, Raymond Huaute states that the tribe is not aware of any cultural resources within the project boundaries, but requests the implementation of the tribe's "Standard Development Conditions" to ensure proper treatment of Native American cultural remains, including human remains, encountered during the project.

Shasta Gaughen, Tribal Historic Preservation Officer for the Pala Band of Mission Indians and Assistant Director of the Kupa Cultural Center, states in a letter dated March 25, 2015 that the Pala Band will defer to other tribes in closer proximity to the

project area. Responding on behalf of the Pauma Band of Luiseno Indians by e-mail on March 31, 2015 Tribal Cultural Clerk Chris Devers states that the Pauma Band has no specific information on any cultural resources in the project vicinity, but recommends archaeological and Native American monitoring of all ground-disturbing activities during the project. General Plan Policy HP-1.3 states that the City shall protect sites of archaeological and paleontological significance and ensure compliance with the Federal Native American Graves Protection and Repatriation Act in its planning and project review process.

On September 25, 2014, Governor Brown signed Assembly Bill 52 (AB 52), which imposes new requirements for consultation regarding projects that may affect a tribal cultural resource. AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if they have requested notice of projects within the area. If the tribe requests consultation within 30 days upon receipt of notice, the lead agency must consult with the tribe. The parties must consult in good faith and consultation is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource or when a party concludes that mutual agreement cannot be reached. The Soboba Band of Luiseno Indians and the Pechanga Band of Luiseno Indians requested consultation on this project. The City of Riverside, MIG, and CRM Tech representative concluded consultation with these tribes in August 2015 and with no requests for additional analysis or mitigation beyond that provided in the cultural resources technical report.

In the unlikely event that archeological materials are uncovered, Mitigation Measures CUL-1 through CUL-3 are incorporated to ensure that uncovered resources are evaluated, left in place if possible, or curated as recommended by a qualified anthropologist. Native American monitoring is included to provide assistance in identifying potential resources as requested through tribal consultation. Impacts to buried archaeological resources will be less than significant with mitigation incorporated.

Mitigation Measures

In the event of the unanticipated discovery of archaeological resources during earthmoving operations the following mitigation measures are recommended to reduce potentially significant impacts to archaeological resources that are accidentally discovered during implementation of the proposed project to a less than significant level:

CUL-1 Archaeological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project 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.

- a. 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:
 - i. Project grading and development scheduling;
 - ii. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist 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;
 - iii. The protocols and stipulations that the Developer, City, Tribes and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; and
 - iv. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure CUL-3.

CUL-2 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:

- a. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite 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
- b. 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:
 - i. Accommodate the process for onsite 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 cataloging and basic recordation have been completed;
 - ii. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would 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;
 - iii. For purposes of conflict resolution, 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
 - iv. 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.

CUL-3 Cultural Sensitivity Training: The 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.

c) **Less than Significant Impact with Mitigation Incorporated.** The project site will not involve import or export of soil. According to the Riverside General Plan 2025 EIR, the project site is located in an area with unknown prehistoric cultural resource sensitivity. General Plan Policy HP-1.3 states that the City shall protect sites of archaeological and paleontological significance and ensure compliance with the Federal Native American Graves Protection and Repatriation Act in its planning and project review process. In the event that paleontological materials are uncovered, Mitigation Measure CUL-4 is incorporated to 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.

Mitigation Measures

CUL-4 If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Community and Economic Development Director. The applicant shall bear the cost of implementing this mitigation.

d) **Less than Significant with Mitigation Incorporated.** There are no known cemeteries on the project site or within the project area. Therefore, no human remains or cemeteries are anticipated to be disturbed by the proposed project. Grading activities for the proposed development will be limited in scale so as to minimally disturb the existing grade. In the unlikely event that human remains are uncovered, the project would comply with CEQA requirements and the requirements of Mitigation Measure CUL-5 including halting construction activities until a County coroner can evaluate the find and notify a Native American Representative if the remains are of Native American origin. Compliance existing regulations and Mitigation Measure CUL-5 will result in less than significant impacts.

Mitigation Measures

CUL-5 Cease Ground-Disturbing Activities and Notify County Coroner If Human Remains Are Encountered. If human remains are unearthed during implementation of the Proposed Project, the City of Riverside and the Applicant shall comply with State Health and Safety Code Section 7050.5. The City of Riverside and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). After the MLD has inspected the remains and the site, they have 48 hours to provide recommendations to the landowner. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

4.6- Geology and Soils

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	☐	☐	☐	☒
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?	☐	☐	☐	☒

a.i) **No Impact.** The proposed project is not located on a known fault as delineated on the Alquist-Priolo Earthquake Fault Zoning Map.¹⁰ No impact will occur.

a.ii) **Less than Significant Impact.** The proposed project will be subject to ground shaking impacts should a major earthquake occur in the future. Potential impacts include injury or loss of life and property damage.

The proposed project is subject to the seismic design criteria of the California Building Code (CBC). Adherence to these requirements will reduce the potential of the buildings from collapse during an earthquake, thereby minimizing injury and loss of life. Although structures may be damaged during earthquakes, adherence to seismic design requirements will minimize damage to property within the structure because the structure is designed not to collapse. The CBC is intended to provide minimum requirements to prevent major structural failure and loss of life. Adherence to existing regulations will reduce the risk of loss, injury, and death; impacts due to strong ground shaking will be less than significant.

a.iii) **Less than Significant Impact.** The Riverside General Plan EIR indicates that the project is located within an area with moderate to high liquefaction potential.¹¹ However, the geotechnical report determined that the potential for liquefaction at the site is considered to be low, due to the very dense granular soils below a historic groundwater depth of 30 feet. (see Appendix E, Geotechnical Investigation/Geotechnical Infiltration Report). The proposed project would be subject to standard CBC measures to provide for sound structural design that include considerations for on-site soil conditions, occupancy, and the configuration of the structure including the structural system and height. Therefore, based on the determination of the geotechnical report that on-site conditions are not susceptible to liquefaction and with adherence to CBC requirements, project impacts will be less than significant.

a.iv) **No Impact.** Structures built below or on slopes subject to failure or landslides may expose people and structures to harm. The project site is relatively flat and is not located within an area of required investigation for landslides. No impact will result.

b) **Less than Significant Impact.** Erosion and loss of topsoil could result in damage to on-site structures and landscaping or to neighboring properties. Erosion can also impact downstream water bodies while loss of nutrient-rich topsoil impacts the ability for vegetation to grow. The proposed project is subject to SCAQMD Rule 403 and the erosion control requirements of the CBC to prevent wind-blown and stormwater-related erosion. Rule 403 will minimize wind-blown erosion by requiring stabilization of disturbed soils during construction activities through measures such as daily watering. All individual construction project activities greater than one acre will be subject to the State's General Permit for Construction Activities that is administered by the California Regional Water Quality Control Board (RWQCB). Employment of Best Management Practices (BMPs) implemented through a SWPPP would be required to limit the extent of eroded materials from a construction site. Development that is one acre or more would be required to comply with the provisions of the NPDES regulations concerning the discharge of eroded materials and pollutants from construction sites and prepare and implement a SWPPP. With implementation of existing regulations, impacts due to erosion and loss of topsoil will be less than significant.

c) **Less than Significant Impact.** As stated in the Section 4.a.iii), the soils on the project contain low potential for liquefaction. Based on the project site's slope conditions being relatively flat, potential for lateral spreading and landslide would be minimal. The geotechnical report prepared for the project site determined that the proposed development is acceptable from a geotechnical engineering standpoint. Standard CBC and recommendations from the geotechnical report will be implemented during grading. Standard CBC requirements for construction will be implemented. Impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse will be less than significant with adherence to CBC requirements and implementation of the proposed recommendations included in the geotechnical report.

¹⁰ California Department of Conservation. Special Study Zones. San Bernardino South Quadrangle. 1977.

¹¹ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

- d) **No Impact.** Expansive soils shrink and swell in response to moisture due to high percentages of clay. Expansive soils can result in damage to structures when clay within the soil swells due to moisture. The project site is not located on soil with high shrink-swell potential according to the Riverside General Plan EIR.¹² No impact will occur.
- e) **No Impact.** The project site is served by a fully functional sewer system. The project will connect to this system and will not require use of septic tanks. No impact will occur.

¹² Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.7- Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

a) **Less than Significant Impact.** Climate change is the distinct change in measures of climate for a long period of time.¹³ Climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. Natural changes in climate can be caused by indirect processes such as changes in the Earth's orbit around the Sun or direct changes within the climate system itself (i.e. changes in ocean circulation). Human activities can affect the atmosphere through emissions of greenhouse gases (GHG) and changes to the planet's surface. Human activities that produce GHGs are the burning of fossil fuels (coal, oil and natural gas for heating and electricity, gasoline and diesel for transportation); methane from landfill wastes and raising livestock, deforestation activities; and some agricultural practices.

Greenhouse gases differ from other emissions in that they contribute to the "greenhouse effect." The greenhouse effect is a natural occurrence that helps regulate the temperature of the planet. The majority of radiation from the Sun hits the Earth's surface and warms it. The surface in turn radiates heat back towards the atmosphere, known as infrared radiation. Gases and clouds in the atmosphere trap and prevent some of this heat from escaping back into space and re-radiate it in all directions. This process is essential to supporting life on Earth because it warms the planet by approximately 60° Fahrenheit. Emissions from human activities since the beginning of the industrial revolution (approximately 250 years ago) are adding to the natural greenhouse effect by increasing the gases in the atmosphere that trap heat, thereby contributing to an average increase in the Earth's temperature. Greenhouse gases occur naturally and from human activities. Greenhouse gases produced by human activities include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆). Since 1750, it is estimated that the concentrations of carbon dioxide, methane, and nitrous oxide in the atmosphere have increased over 36 percent, 148 percent, and 18 percent, respectively, primarily due to human activity. Emissions of greenhouse gases affect the atmosphere directly by changing its chemical composition while changes to the land surface indirectly affect the atmosphere by changing the way the Earth absorbs gases from the atmosphere.

A numerical threshold for determining the significance of greenhouse gas emissions in the South Coast Air Basin (Basin) has not been established by the South Coast Air Quality Management District (SCAQMD). As an interim threshold based on guidance provided in the CAPCOA CEQA and Climate Change handbook, a non-zero threshold approach based on Approach 2 of the handbook has been used. Threshold 2.5 (Unit-Based Thresholds Based on Market Capture) establishes a numerical threshold based on capture of approximately 90 percent of emissions from future development. The latest threshold developed by SCAQMD using this method is 10,000 metric tons carbon dioxide equivalent (MTCO₂E) per year for

¹³ United States Environmental Protection Agency. Frequently Asked Questions About Global Warming and Climate Change. Back to Basics. April 2009.

industrial projects.¹⁴ This threshold is based on the review of 711 CEQA projects. This threshold will be utilized herein to determine if emissions of greenhouse gases from this project will be significant.

The proposed project will include activities that emit greenhouse gas emissions over the short- and long-term. While one project could not be said to cause global climate change, individual projects contribute cumulatively to greenhouse gas emissions that result in climate change. A greenhouse gas emissions inventory was prepared for the project using under BAU conditions and is analyzed below.

Short-Term Emissions

The project will result in short-term greenhouse gas emissions from construction and installation activities associated with construction of the proposed project. Greenhouse gas emissions will be released by equipment used for grading, paving, and building construction activities. GHG emissions will also result from worker and vendor trips to and from the project site. Table 8 (Construction Greenhouse Gas Emissions) summarizes the estimated yearly emissions from construction activities. Carbon dioxide emissions from construction equipment and worker/vendor trips were estimated utilizing the California Emissions Estimator Model (CalEEMod) version 2013.2.2 (see Appendix A). Construction activities are short-term and cease to emit greenhouse gases upon completion, unlike operational emissions that are continuous year after year until operation of the use ceases. Because of this difference, SCAQMD recommends in its draft threshold to amortize construction emissions over a 30-year operational lifetime. This normalizes construction emissions so that they can be grouped with operational emissions in order to generate a precise project GHG inventory. Amortized construction emissions are included in Table 8.

Table 8
Construction Greenhouse Gas Emissions

Construction Year	GHG Emissions (MT/YR)			
	CO ₂	CH ₄	N ₂ O	TOTAL*
2016	934	<1	0	936
2017	396	<1	0	397
AMORTIZED TOTAL^	44	<1	0	44
* MTCO2E				
Note: Slight variations may occur due to rounding and variations in modeling software				
^ Amortized over 30-years				

Long-Term Emissions

Warehousing and distribution activities will result in continuous greenhouse gas emissions from mobile and operational sources. Mobile sources including vehicle trips to and from the project site will result primarily in emissions of CO₂ with minor emissions of CH₄ and N₂O. The most significant GHG emission from natural gas usage will be methane. Electricity usage by the project and indirect usage of electricity for water and wastewater conveyance will result primarily in emissions of carbon dioxide. Disposal of solid waste will result in emissions of methane from the decomposition of waste at landfills coupled with CO₂ emission from the handling and transport of solid waste. These sources combine to define the long-term greenhouse gas emissions for the build-out of the proposed project.

To determine long-term emissions, CalEEMod was used. The methodology utilized for each emissions source is based on the CAPCOA *Quantifying Greenhouse Gas Mitigation Measures* handbook.¹⁵ A summary of the project's net long-term greenhouse gas emissions is included in Table 9 (Operational Greenhouse Gas Emissions). Emissions are presented as metric tons of carbon dioxide equivalent (MTCO2E) meaning that all emissions have been weighted based on their Global Warming Potential (GWP) (a metric ton is equal to 1.102 US short tons).

¹⁴ South Coast Air Quality Management District. CEQA Significance Thresholds Working Group. Meeting # 15, Main Presentation. September 28, 2010

¹⁵ California Air Pollution Control Officers Association. Quantifying Greenhouse Gas Emissions. August 2010

Table 9
Operational Greenhouse Gas Emissions

Source	GHG Emissions (MT/YR)			
	CO ₂	CH ₄	N ₂ O	TOTAL*
Area	<1	<1	0	<1
Energy	738	<1	<1	740
Mobile	4,827	<1	0	4,828
Solid Waste	59	3	0	132
Water/Wastewater	598	2	<1	664
TOTAL	6,221	6	<1	6,364
* MTCO ₂ E/YR				
Note: Slight variations may occur due to rounding				

Mobile sources are based on annual vehicle miles traveled (VMT) based on daily trip generation identified in the trip generation memorandum.¹⁶ Trip lengths have been adjusted based on a study of metropolitan commercial and freight travel conducted by the National Cooperative Highway Research Program. According to observed data collected in the field for the Southern California Association of Governments (SCAG) region, trip lengths for similar uses are estimated at 5.92 miles for light-duty trucks, 13.06 for medium-duty trucks, and 22.40 for heavy-duty trucks. Total vehicle miles were calculated using the average daily trips for each vehicle class and divided by total daily truck trips to get to an average truck distance of 17.41 miles. Natural gas usage and electricity usage are based on default demand figures utilized in CalEEMod. Solid waste generation is also based on CalEEMod defaults.

CalEEMod does not include outdoor landscape irrigation demand defaults for this type of project. Estimated irrigation needs for landscaping was calculated at 2,591,811 gallons per year. Landscape irrigation requirements were calculated using the California Department of Water Resources (DWR) *Water Budget Workbook* that calculates the Maximum Applied Water Allowance (MAWA) for landscaping based on the requirements of the state water conservation in landscaping act.¹⁷ This reflects the maximum allowable amount of water that is permitted to be used annually after consideration of effective precipitation (25 percent of annual rainfall). MAWA is calculated using the following equation:

$$MAWA = (ET_o - Eppt) * 0.62 * [(0.70 * LA) + (0.30 * SLA)]$$

Where:

MAWA = Maximum Applied Water Allowance (gallons per year)
 ET_o = Reference Evapotranspiration for Locale (inches per year)
 Eppt = Effective Precipitation (inches per year)
 LA = Landscape Area (square feet)
 SLA = Special Landscape Area (square feet)

Indoor water demand and wastewater discharges are based on CalEEMod defaults.

Greenhouse Gas Emissions Inventory

Table 10 (Greenhouse Gas Emissions Inventory) summarizes the yearly estimated greenhouse gas emissions from construction and operational sources. The total yearly carbon dioxide equivalent emissions for the proposed project are estimated at 6,408 MTCO₂E. This does not exceed the SCAQMD threshold of 10,000 MTCO₂E per year.

¹⁶ Kunzman Associates, Inc. Trip Generation Memorandum. October 3, 2014

¹⁷ California Department of Water Resources. Water Budget Workbook. www.water.ca.gov/wateruseefficiency/docs/WaterBudget.xls [October 2014]
www.water.ca.gov/wateruseefficiency/docs/WaterBudget.xls [October 2014]

Table 10
Greenhouse Gas Emissions Inventory

Source	GHG Emissions (MT/YR)			
	CO ₂	CH ₄	N ₂ O	TOTAL*
Construction	44	<1	0	44
Operation	6,221	6	<1	6,364
Total				6,408
* MTCO2E/YR				
Note: Slight variations may occur due to rounding				
^ Construction impacts amortized over 30-years				

b) **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. As indicated in response A, above, the project would comply with the City's General Plan policies, Municipal Code Chapter 16.07 (Green Code), and State Building Code provisions designed to reduce GHG emissions. In addition, the project would comply with all SCAQMD applicable rules and regulations during construction of the project and, as demonstrated in the Climate Change 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.

4.8- Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
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?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☐	☒

a) **Less than Significant Impact.** The proposed project could result in a significant hazard to the public if the project includes the routine transport, use, or disposal of hazardous materials or places housing near a facility which routinely transports, uses, or disposes of hazardous materials. According to the EPA, the proposed project is not located within a quarter-mile of listed facilities that produce hazardous wastes.¹⁸

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. Widely used hazardous materials common at any warehouse 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) **Less than Significant Impact.** Construction of the proposed project and future tenant improvements will require the use and transport of hazardous materials such as asphalt, paints, and other solvents. Construction activities could also produce hazardous wastes associated with the use of such products. Construction of the proposed project requires ordinary construction activities and will not require a substantial or uncommon amount of hazardous materials to complete.

Activities associated with the demolition of existing structures on the southeastern portion of the site may pose a hazard with regard to asbestos containing materials (ACM) and lead-based paints. ACM were used on a widespread basis in building construction prior to and into the 1980s; therefore, it is assumed that ACM is present on the project site and will need to be handled following specific regulations/guidelines described below. Asbestos generally does not pose a threat when it remains intact. When asbestos is disturbed and becomes airborne, SCAQMD Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities) requires work practices that limit asbestos emissions from building demolition and renovation activities, including the removal and disturbance of ACM.¹⁹ This rule is designed to protect uses and persons adjacent to demolition or renovation activity from exposure to asbestos emissions. Rule 1403 requires a certified inspector to survey any facility being demolished or renovated for the presence of all friable and Class I and Class II non-friable ACM. The applicant must also notify SCAQMD of their intent to perform demolition or renovation of any buildings that may contain asbestos prior to demolition and requires that all ACM is removed prior to any demolition. Rule 1403 also establishes notification procedures, removal procedures, handling and clean-up procedures, storage, disposal, landfilling requirements, and warning label requirements, including HEPA filtration, the *glovebag* method, wetting, and some methods of dry removal that must be implemented when disturbing appreciable amounts of ACM (more than 100 square feet of surface area). All ACM shall be disposed of at a waste disposal site operated in accordance with Rule 1403. The applicant will also ensure the safety of constructor workers involved in the ACM removal by complying with all California Asbestos Standards in Construction, including, but not limited to minimum air circulations, use of respirators, wetting of materials, clothing

¹⁸ United States Environmental Protection Agency. Envirofacts. <http://www.epa.gov/enviro/index.html> [June 2015]

¹⁹ South Coast Air Quality Management District. Rule 1403: Asbestos Emissions from Demolition/Renovation Activities. Amended October 5, 2007

laundering, construction and demolition equipment requirements, and shielding specifications. Adherence to SCAQMD Rule 1403 would ensure that impacts related to the release of ACM are less than significant.

Exposure of construction workers to lead-based paint during demolition activities is also of concern, similar to exposure to asbestos. Exposure of surrounding land uses to lead from demolition activities is generally not a concern because demolition activities do not result in appreciable emissions of lead.²⁰ The primary emitters of lead are industrial processes. Any lead-based paint utilized on the exterior and interior of the existing structures would generally remain inside the structure or close to the exterior of the building and would be removed during demolition. Improper disposal of lead-based paint could contaminate soil and subsurface groundwater in and under landfills not properly equipped to handle hazardous levels of this groundwater in and under landfills not properly equipped to handle hazardous levels of this material. Due to the age of the buildings it is assumed that lead-based paint is present. Therefore, 8 CCR Section 1532.1 (California Construction Safety Orders for Lead) must be followed for the demolition of all existing structures requiring exposure assessment and compliance measures to keep worker exposure below action levels. The proposed project is also subject to Title 22 requirements for the disposal of solid waste contaminated with excessive levels of lead. Testing, monitoring, containment, and disposal of lead-based materials will comply with all Cal/OSHA standards and regulations under California Construction Safety Orders for Lead section 1532. Adherence to standard regulation would ensure that impacts related to the release of lead based paints would be less than significant.

c) **No Impact.** No schools are located within one-quarter mile of the project site. Therefore, no impact will occur.

d) **No Impact.** The proposed project is not located on a site listed on the State 'Cortese List', a compilation of various sites throughout the state that have been compromised due to soil or groundwater contamination from past uses. Therefore, no impact will occur.

Based upon review of the Cortese list, the project site is not:

- listed as a hazardous waste and substance site by the Department of Toxic Substances Control (DTSC),²¹
- listed as a leaking underground storage tank (LUFT) site by the State Water Resources Control Board (SWRCB),²²
- listed as a hazardous solid waste disposal site by the SWRCB,²³
- currently subject to a Cease and Desist Order (CDO) or a Cleanup and Abatement Order (CAO) as issued by the SWRCB,²⁴ or
- developed with a hazardous waste facility subject to corrective action by the DTSC.²⁵

e-f) **No Impact.** The proposed project is not located within two miles of a public or private airstrip or within an airport land use plan. No Impact will occur.

g) **Less than Significant Impact.** The proposed project site is primarily vacant with one single family residence and five ancillary structures on the southeast corner of the site. The project will therefore increase trips in the area. Per state Fire and Building codes, sufficient space will have to be provided around the buildings for emergency personnel and equipment

²⁰ California Department of Toxic Substances. *Draft Lead Report*. June 2004

²¹ California Department of Toxic Substances Control. Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm [June 2015]

²² California State Water Resources Control Board. GeoTracker. geotracker.waterboards.ca.gov [June 2015]

²³ California State Water Resources Control Board. Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit. www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf [June 2015]

²⁴ California State Water Resources Control Board. List of Active CDO and CAO. <http://www.calepa.ca.gov/sitecleanup/corteseelist/> [June 2015]

²⁵ California Department of Toxic Substances Control. Hazardous Facilities Subject to Corrective Action. www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities [June 2015]

access and emergency evacuation. All project elements, including landscaping, would be sited with sufficient clearance from existing and proposed structures so as not to interfere with emergency access to and evacuation from the site. The project is required to comply with the California Fire Code (Title 24, California Code of Regulations, Section 9). The site plan includes two ingress/egress access points on Center Street.

The project driveways will allow emergency access and evacuation from the site, and will be constructed to California Fire Code specifications. The project would not impair implementation of or physically interfere with an adopted emergency response plan or evacuation plan because no permanent public street or lane closures are proposed. Construction work in the street associated with the buildings would be limited to lateral utility connections that would be limited to nominal potential traffic diversion. Traffic control will be provided for any lane closures. Project impacts will be less than significant.

h) **No Impact.** The project site is surrounded to the north, east, and south by other primarily developed parcels consisting of industrial land uses and the AYSO soccer fields. According to the Riverside General Plan EIR, the project site is not located in a high fire hazard area.²⁶ No impact will result.

²⁶ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.9- Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
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)?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
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?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☒	☐

	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?	☐	☐	☒	☐
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☒	☐

a) **Less than Significant Impact.** Violations of water quality standards or waste discharge requirements, or degradation of water quality can result in potentially significant impacts to water quality and result in environmental damage or sickness in people. The project would result in a significant impact to water quality if water quality standards, waste discharge requirements, or degradation of water quality occurred.

Point-source pollutants can be traced to their original source. Point-source pollutants are discharged directly from pipes or spills. Raw sewage draining from a pipe directly into a stream is an example of a point-source water pollutant. The project consists of the development of one building totaling 308,000 square feet and does not propose any uses that would generate point source pollutants. Therefore, water quality impacts due to point sources would be less than significant.

Non-point-source pollutants (NPS) cannot be traced to a specific original source. NPS pollution is caused by rainfall or snowmelt moving over and through surface areas. As the runoff moves, it picks up and carries away natural and human-made pollutants, finally depositing them into lakes, rivers, wetlands, coastal waters, and even underground sources of drinking water. These pollutants include:

- Excess fertilizers, herbicides and insecticides from agricultural lands and residential areas
- Oil, grease, and toxic chemicals from urban runoff and energy production
- Sediment from improperly managed construction sites, crop and forest lands, and eroding streambanks
- Salt from irrigation practices and acid drainage from abandoned mines
- Bacteria and nutrients from livestock, pet wastes, and faulty septic systems
- Atmospheric deposition and hydromodification

Impacts associated with water pollution include ecological disruption and injury or death to flora and fauna, increased need and cost for water purification, sickness or injury to people, and degradation or elimination of water bodies as recreational opportunities. Accidents, poor site management or negligence by property owners and tenants can result in accumulation of pollutant substances on parking lots, loading and storage areas, or result in contaminated discharges directly into the storm drain system.

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 would disturb approximately 15.88 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 SWPPP that will include BMPs protects water quality during construction activities. The City will require BMPs as listed in the California Stormwater Quality Association's California Storm Water Best Management Practice Handbooks. These measures, which include resident/owner education, activity restrictions, parking lot sweeping, basin inspection, landscaping, roof runoff controls, efficient irrigation, slope and channel protection, storm drain signage, trash racks, 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 to the City for review and approval. Impacts related to violation of water quality standards will be less than significant with implementation of these existing regulations.

b) **Less than Significant Impact.** If the project removed an existing groundwater recharge area or substantially reduced runoff that results in groundwater recharge, a potentially significant impact could occur.

The site is primarily vacant with one single-family residence on the southeast corner of the site. The proposed project will construct impervious pavement with areas of landscaping as well as one water quality basin that could provide for similar levels of groundwater recharge compared to the existing conditions. The site does not accommodate any substantial natural drainage or managed recharge areas. The project site is surrounded by material storage yards to the north, a towing company to the east, and the AB Brown Sports Complex to the south. The City of Riverside is served by City of Riverside Public Utilities (RPU). Domestic water is provided via groundwater basins. According to the General Plan EIR, recharge areas for the primary groundwater aquifer utilized by RPU is located in other jurisdictions. Therefore, development within the City of Riverside will not affect groundwater recharge. The project site is not the location of an existing groundwater spreading basin and will not significantly change the runoff from the project that may otherwise recharge groundwater basins; therefore, impacts to groundwater recharge will be less than significant.

c) **Less than Significant Impact.** Potentially significant impacts to the existing drainage pattern of the site or area could occur if development of the project results in substantial on- or off-site erosion or siltation. As was previously detailed in the Project Description, the site is primarily vacant but surrounded by various uses to the north, east, and south. The site generally surface drains south-westerly.

Proposed on-site low impact development (LID) principles include the implementation of BMPs including landscaping and infiltration basins. An infiltration basin is a shallow impoundment that is designed to infiltrate stormwater into the soil. Infiltration basins are believed to have a high pollutant removal efficiency, and can also help recharge the groundwater, thus restoring low flows to stream systems. Infiltration basins need to be applied very carefully, as their use is often sharply restricted by concerns over groundwater contamination, site feasibility, soils, and clogging at the site. Pretreatment refers to design features that provide settling of large particles before runoff reaches a management practice, easing the long-term maintenance burden. Pretreatment is exceptionally important for all infiltration practices. In order to ensure that pretreatment mechanisms are effective, designers should incorporate "multiple pretreatment," using practices such as grass swales, sediment basins, and vegetated filter strips in series, prior to the infiltration basin. Treatment features enhance the pollutant removal of an infiltration basin. Designers need to stabilize upland soils to ensure that the basin does not become clogged with sediment. In addition, the basin needs to be sized so that the volume of water to be treated infiltrates through the bottom in a given amount of time. Because infiltration basins are designed in this manner, infiltration basins designed on less permeable soils will be significantly larger than those designed on more permeable soils. Regular maintenance is critical to the successful operation of infiltration basins. Historically, infiltration basins have had a poor track record. In one study conducted in Prince George's County, Maryland (Galli, 1992), all of the infiltration basins investigated clogged within two years. This trend may not be the same in soils with high infiltration rates, however. A study of twenty-three infiltration basins in the Pacific Northwest showed somewhat better long-term performance in an area with highly permeable soils (Schueler, 2000). In this study, some infiltration basins continued to fail after 10 years (for more information, see *Longevity of Infiltration Basins Assessed in Puget Sound*, Article 102 in *The Practice of Watershed Protection*). Infiltration basins can provide groundwater recharge and pollutant removal. Infiltration basins recharge the groundwater because runoff is treated

for water quality by filtering through the soil and discharging to groundwater. Very little data are available regarding the pollutant removal associated with infiltration basins. It is generally assumed that they have very high pollutant removal, because none of the stormwater entering the practice remains on the surface. A Project Specific Preliminary Water Quality Management Plan (WQMP) has been prepared for the proposed project and is included in Appendix F. The WQMP identifies proposed drainage management areas and the effectiveness of proposed BMPs. According to the WQMP, the design capture volume (DCV) required to capture on-site runoff is 1,904.6 cubic feet. The proposed infiltration basins are proposed to capture approximately 2,035 cubic feet of runoff and infiltrate at a rate of ten inches 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, impacts will be less than significant.

d) **Less than Significant Impact.** As was previously detailed in Section 4.9.c herein, the project will not result in an alteration of the drainage pattern or increase in flows that would result in flooding on- or off-site because all on- and off-site drainage will be controlled by storm drain and flood control facilities. The proposed project's infiltration basin has been designed to accommodate on-site runoff and infiltrate runoff into the soil at a rate of ten inches per hour. Impacts to flooding on- or off-site as a result of a change in the drainage pattern or increase in runoff will thus be less than significant.

e) **Less than Significant Impact.** A potentially significant impact could occur if the project creates or contributes runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff. As was previously detailed in Section 4.9.c, project-related stormwater flows will be directed to the proposed infiltration basin 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. Impacts will be less than significant.

f) **No Impact.** The project does not propose any uses that will have the potential to otherwise degrade water quality beyond those issues discussed in Section 4.9 herein.

g) **No Impact.** The project does not include housing, therefore no impact will occur.

h) **Less than Significant Impact.** The proposed project is not located within a designated 100-year flood hazard area or zone, as indicated on FEMA Flood Insurance Rate Maps; however, the site is located within "Zone X" of "Other Flood Areas" which includes areas of 0.2% annual chance flood, areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile, or areas protected by levees from 1% annual chance flood.²⁷ Therefore, the project will not impede or redirect flood flows. The project will have a less than significant impact.

i) **Less than Significant Impact.** The project site is not located within a dam inundation area.²⁸ Impacts due to levee failure will be less than significant.

j) **Less than Significant Impact.** The project site is located approximately 0.7 miles east of the Santa Ana River. According to the Riverside General Plan EIR, exposure of people or structures to significant risk or loss, injury or death involving inundation by seiche and tsunami are extremely unlikely. According to the Riverside General Plan EIR, mudflows associated with erosion and fire damage may occur near the Santa Ana River. However, because the project site and the surrounding area are relatively flat, impacts related to significant mudflows will be less than significant. Impacts will be less than significant.

²⁷ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

²⁸ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

4.10- Land Use and Planning

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
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?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

a) **No Impact.** The project is surrounded by material storage yards to the north, a towing company to the east, and the AYSO soccer fields to the south. The proposed project is consistent and compatible with the surrounding land uses and will not be dividing an established community. The project does not propose construction of any roadway, flood control channel, or other structure that would physically divide any portion of the community. Therefore, no impact will occur.

b) **Less than Significant Impact.** The proposed project consists of one, 308,000-square foot commerce building. The proposed project would not conflict with any plans or programs adopted to avoid or mitigate an environmental impact because it is consistent with the objectives of the 2025 General Plan and the mitigating policies of the General Plan EIR, as summarized below.

The vision set forth by the City of Riverside in the General Plan to guide industrial development through year 2025 focuses on the creation of high-paying jobs in suitable locations that involve "clean" industrial uses (General Plan 2025, *Preservation of Industrial Land*, pages LU-38 through LU-39). Objectives LU-24 through LU-25, establish the overarching goals, objectives and policies for Riverside's industrial land. The City is clear in its resolve to support clean, economically rich enterprises by limiting any redesignation or rezoning of land from industrial use. Avoid encroachments of incompatible land uses within close proximity of industrial land. . . (Policy LU-24.2)" to ". . . ensure that future uses are in concert with the City's wider policy goals . . . (Policy 24.1)" for industrial and business/office park uses.

The General Plan is not a regulatory document but sets the guidelines for implementation through the City's Zoning Code (Municipal Code Title 19) where the City adopted regulatory standards for site development. The project site is located in the Business and Manufacturing Park Zone (BMP) and is consistent with the General Plan by permitting a ". . . wide variety of industrial, manufacturing, and support uses . . ." in ". . . a district for low-intensity and low-impact industrial, office, and related uses (Section 19.130.010(A))". The Zoning Codes specifically prohibits residential or heavier industrial uses that generate odors (e.g. animal slaughtering, fat rendering, wood distillation), noise (e.g. gravel excavation, automobile wrecking), dust or smoke (e.g. petroleum refining, steel mills, sand excavation), and other causes of nuisance (Sections 19.130.025(A)(1) through (24)) in implementing the policies of the General Plan.

The City analyzed the proposed commerce building as an anticipated manufacturing use providing a “worst-case” scenario due to the greater heavy-truck trips this type of use typically generates. The proposed building is a speculative shell that has the potential to accommodate a breadth of uses permitted by the BMP Zone including warehousing and office. As is documented in this Initial Study, the proposed building will not result in significant impacts to the environment including those related to odors, dust, smoke, noise, or vibration. The proposed project is notably permitted, by right, in the BMP zone and by extension is consistent with the General Plan because it will:

1. Accommodate a variety of manufacturing, office, or warehousing uses;
2. Not generate nuisance or other impacts;
3. Be located in an existing industrial area on a currently underutilized site; and
4. Be physically developable on the site pursuant to City zoning requirements.

The City recognizes that the project is permitted in the BMP zone and is consistent with the General Plan; therefore, any applicable General Plan EIR mitigating policies or measures will be applied to the project, as is standard practice for all development proposals subject to environmental review. The Project Proponent has not requested any General Plan amendments, variances, or other requests that could modify or recues the project from the applicability of required mitigation. General Plan 2025 EIR mitigation measures are designed to avoid cumulative and site specific environmental impacts in concert with other applicable regulations required to mitigate or avoid environmental impacts. Impacts will be less than significant based on these findings.

c) **No Impact.** As discussed in Section 4.4, the project site is subject to the Riverside County Multiple Species Habitat Conservation Plan (MSHCP). All new development is required to comply with the MSHCP, therefore no conflict will occur.

4.11- Mineral Resources

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) **Less than Significant Impact.** The project site is located within a MRZ-2 area, which indicates that adequate information is available to indicate that significant mineral deposits are present or there is a high likelihood for their presence and development should be controlled.²⁹ 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. In addition, the designated land use for the area is incompatible for mining operations.³⁰ Less than significant impact will occur.

b) **No Impact.** The City's General Plan does not identify any locally important mineral resources other than those associated with past mining activities. Maximum potential for those deposits have been reached. The project site is primarily vacant with one single family residence and five ancillary structures and is not used for mineral extraction or mining; therefore the proposed project will not result in any loss of availability of any known or unknown locally important mineral resource than currently already occurs. There are no known mining operations within the vicinity of the project site and zoning and surrounding land uses would preclude mining from occurring. No impact will occur.

²⁹ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

³⁰ California Department of Conservation, State Mining and Geology Board. Guidelines for Classification and Designation of Mineral Lands. 2000.

4.12- Noise

Would the project result in:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
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?	☐	☐	☐	☒
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?	☐	☐	☐	☒

Noise can be defined as unwanted sound. Sound (and therefore noise) consists of energy waves that people receive and interpret. Sound pressure levels are described in logarithmic units of ratios of sound pressures to a reference pressure, squared. These units are called *bel*s. In order to provide a finer description of sound, a *bel* is subdivided into ten *decibels*, abbreviated dB. To account for the range of sound that human hearing perceives, a modified scale is utilized known as the A-weighted decibel (dBA). Since decibels are logarithmic units, sound pressure levels cannot be added or subtracted by ordinary arithmetic means. For example, if one automobile produces a sound pressure level of 70 dBA when it passes an observer, two 2 cars passing simultaneously would not produce 140 dBA. In fact, they would combine to produce 73 dBA. This same principle can be applied to other traffic quantities as well. In other words, doubling the traffic volume on a street or the speed of the traffic will increase the traffic noise level by 3 dBA. Conversely, halving the traffic volume or speed will

reduce the traffic noise level by 3 dBA. A 3 dBA change in sound is the beginning at which humans generally notice a *barely perceptible* change in sound and a 5 dBA change is generally *readily perceptible*.³¹

Noise consists of pitch, loudness, and duration; therefore, a variety of methods for measuring noise has been developed. According to the California General Plan Guidelines for Noise Elements, the following are common metrics for measuring noise:³²

L_{EQ} (Equivalent Energy Noise Level): The sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over given sample periods. L_{EQ} is typically computed over 1-, 8-, and 24-hour sample periods.

CNEL (Community Noise Equivalent Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after addition of five decibels to sound levels in the evening from 7:00pm to 10:00pm and after addition of ten decibels to sound levels in the night from 10:00pm to 7:00am.

L_{DN} (Day-Night Average Level): The average equivalent A-weighted sound level during a 24-hour day, obtained after the addition of ten decibels to sound levels in the night after 10:00pm and before 7:00am.

CNEL and L_{DN} are utilized for describing ambient noise levels because they account for all noise sources over an extended period of time and account for the heightened sensitivity of people to noise during the night. L_{EQ} is better utilized for describing specific and consistent sources because of the shorter reference period.

A noise study was prepared by MIG | Hogle-Ireland and is included as Appendix G.

Existing Noise Levels

Short-term noise measurements at the project site were conducted to identify the ambient noise in the project vicinity. An American National Standards Institute (ANSI Section S14 1979, Type 1) Larson Davis model LxT sound level meter was used to monitor existing ambient noise levels in the project area. The noise meter was programmed in “slow” mode to record noise levels in A-weighted form. The microphone height was set at five feet. Two 10-minute daytime noise measurements were taken between 9:48 AM and 10:12 AM on Tuesday, April 7, 2015.

Ambient noise levels ranged from 58.7 to 66.9 dBA CNEL. Ambient noise levels are a composite of noise from all sources, near and far. In this context, the ambient noise level constitutes the normal or existing level of environmental noise at a given location. Ambient noise levels are presented in Table 11 (Ambient Noise Levels).

Vehicular traffic along Center Street and Placentia Lane was the dominant noise source at measurement location 001 and truck traffic entering and exiting the industrial use at the south end of Sieck Road was the dominant noise source at measurement location 002. See Exhibit 4 (Noise Measurement Locations).

Table 11
Ambient Noise Levels

Location	Time Period	Measurement Period	Description	Existing Ambient Noise Levels (dBA CNEL)
001	9:48 AM – 9:58 AM	10 Minutes	Northern property boundary on the south side of Center Street	66.9
002	10:02 AM – 10:12 AM	10 Minutes	Southwestern corner of Placentia Lane and Sieck Road	58.7

³¹ California Department of Transportation. Basics of Highway Noise: Technical Noise Supplement. November 2009.

³² California Governor's Office of Planning and Research. General Plan Guidelines. 2003



Exhibit 4 Noise Measurement Locations

Center Street Commerce Building Project
6550 Center Street, Riverside, California

Source: Google Earth, 2015

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MIG Hogle-Ireland

Planning Commission - Exhibit 1 - Development Review Committee Staff Report
Development Review Committee - Exhibit 7 - CEQA Documents

Attachment 3 - City Planning Commission Report and Exhibits - April 05, 2018

a) **Less than Significant Impact with Mitigation Incorporated.** The City of Riverside General Plan has established noise compatibility standards for land uses throughout the city.³³ Exterior noise levels for residential land uses are considered acceptable up to 55 dBA CNEL, 65 dBA CNEL for office/commercial land uses, and 70 dBA CNEL for industrial land uses. Existing land uses surrounding the project site and within the project vicinity generally consists of industrial facilities and single family residences.

Construction Noise Levels

Construction noise levels were estimated for nearby receptors using the FHWA Roadway Construction Noise Model (RCNM). Temporary noise increases will be greatest during the demolition phase. The model indicates that the use of construction equipment such as excavators, dozers, and concrete saws could expose the industrial use located approximately 421 feet to the south of the center of the project site to a combined noise level of 71.1 dBA L_{max} . Construction equipment could expose the industrial use located 640 feet south, the industrial use located 510 feet east, and the park located 544 feet from the center of the project site to a combined noise level of 67.4 dBA L_{max} , 69.4 dBA L_{max} , and 68.8 dBA L_{max} , respectively. Within the City of Riverside, a noise level of 70 dBA is allowable at surrounding industrial uses and a noise level of 65 dBA is allowable at public recreation facilities. To the north of the project site is the City of Colton. Within the City of Colton, the maximum allowable exterior noise level is 65 dBA. Construction activity could result in noise levels in excess of the allowable noise levels at the industrial use to the south, the public recreation use to the south, and the industrial use to the north of the project site. Therefore, Mitigation Measure N-1 have been incorporated to reduce the impact to neighboring uses during construction.

Per Section 7.35.10 (General Noise Regulations) of the Riverside Municipal Code, construction activities occurring between the hours of 7:00 PM and 7:00 AM on Mondays through Fridays, between 5:00 PM and 8:00 AM on Saturdays, and any time on Sundays and federal holidays are prohibited. Due to the time limitations on construction activity, surrounding employees and park users will be exposed to limited construction noise. Because noise levels during construction activities are anticipated to exceed the City's exterior noise standards, measures will be necessary to minimize noise levels at nearby receptors. Mitigation Measure N-1 will be incorporated to minimize noise associated with general construction activities. Mitigation Measure N-1 requires preparation of a construction noise reduction plan to reduce temporary noise impacts by a minimum of 20 dBA. This is a feasible performance standard to achieve based on the availability of construction noise reduction technology and techniques. Engineered noise control options include retrofitting equipment with improved exhaust and intake muffling, disengaging equipment fans, and installation of sound panels around equipment engines. These types of controls can achieve noise level reductions of approximately 10 dBA.³⁴ ³⁵ Sound curtains and other noise barriers are available for general construction noise and achieve reductions of up to 20 dBA.³⁶ Implementation of Mitigation Measure N-1 will reduce temporary noise impacts by a minimum of 20 dBA, resulting in a maximum construction noise level of 57.3 dBA at the commercial use to the west of the project site. Therefore, with implementation of Mitigation Measures N-1 and adherence to City standards, construction noise will feasibly be reduced to levels that are less than significant.

Operational Noise levels

The City of Riverside Municipal Code sets an allowable exterior noise level for industrial uses at 70 dBA CNEL, 65 dBA CNEL for public recreational facilities and office/commercial use, 60 dBA for community support uses, and 55 dBA for residential use. The City of Colton sets an allowable noise level of 65 dBA CNEL. Ambient noise at the project site would generally be defined by traffic on Center Street, Placentia Lane, and operational noise from neighboring industrial uses. A substantial increase in ambient noise is an increase that is *barely perceptible* (3 dBA). Operationally, the proposed project will result in periodic landscaping and other occasional noise generating activities. These activities are common in urban uses and do not represent a substantial increase in periodic noise in consideration that the project site is located in an

³³ City of Riverside General Plan Noise Element.

³⁴ United States Bureau of Mines. Mining Machinery Noise Control Guidelines. 1983

³⁵ United States Bureau of Mines. Noise Abatement Techniques for Construction Equipment. August 1979

³⁶ Sound Seal. Sound Seal Sound Curtains Exterior Grade Noise Control. <http://www.soundcurtains.com/exterior-grade-noise-control.pdf> [October 2014]

industrialized area. Traffic noise from vehicular traffic generated by the proposed project was projected using SoundPLAN software was based on estimated trip generation and distribution provided by Kunzman Associates, Inc.³⁷

The Without Project noise levels at neighboring uses were calculated using SoundPLAN software to provide a baseline of the Opening Year 2018 traffic noise levels. A traffic study was not required for this proposed project. Therefore, the Opening Year 2018 Without Project traffic noise environment was estimated utilizing average daily traffic counts provided by Google Earth Pro for Center Street and Orange Street. Google Earth Pro average daily traffic counts for Center Street and Orange Street are from the years 1999 and 2008, respectively. In order to account for growth in the area and increases in traffic volumes, a growth rate of two percent per year has been applied to the provided average daily traffic counts to bring the estimated volumes up to Opening Year 2018. Roadway volumes for Placentia Lane were not available. Therefore, to provide a worst-case analysis, the average daily roadway capacity of a local street experiencing Level of Service C has been assumed (see Table 12 (Roadway Traffic Volumes). Peak hour volumes are estimated to be ten percent of average daily traffic.

Table 12
Roadway Traffic Volumes

Roadway	Opening Year 2018 Volume	Peak Hour Volumes
Center Street ¹	14,569	1,457
Orange Street ²	2,882	288
Placentia Lane ³	2,800	280
¹ 1999 Traffic Count – 10,000 (Source: Google Earth Pro) ² 2008 Traffic Count – 2,364 (Source: Google Earth Pro) ³ Based on City of Riverside Roadway Capacity for Local Road operating at LOS C		

Noise levels at the single family homes to the east and west, the industrial uses to the north and east, and the commercial use to the east were calculated (see Appendix C for output data) and projected at the ground floor. The 2017 *Opening Year Without and With Project* traffic noise levels during the peak hour at neighboring uses are summarized in Table 13 (Opening Year 2017 Peak Hour Roadway uNoise Levels). *Opening Year Without and With Project* exterior noise levels will be within the allowable exterior noise levels established by the City of Colton for the northern industrial use and within the established City of Riverside exterior noise standard for the industrial and commercial uses to the east and the residential use to the southeast of the project site on the east side of Orange Street. The exterior noise levels under the Without and With Project scenarios exceed allowable exterior noise levels at the residential uses to the northeast, southeast, and northwest of the project site. However, the project does not cause the exterior noise levels to exceed the 55 dBA residential threshold for receptors that are currently below the allowable noise levels. In addition, traffic noise levels will not increase more than 3 dBA as a result of the proposed project as shown in Table 13. Therefore, no significant impacts will result.

Table 13
Opening Year 2017 Peak Hour Roadway Noise Levels

Receptors	Without Project dBA CNEL		With Project dBA CNEL		Difference (AM / PM)	Significant? (AM / PM)
	AM	PM	AM	PM		
1 – Industrial (N)	57.0	57.8	58.2	58.8	+1.2 / +1.0	No / No
2 – Industrial (E)	61.3	62.3	63.3	64.1	+2.0 / +1.8	No / No
3 – Single Family Residential (NE)	57.9	59.4	59.7	60.8	+1.8 / +1.4	No / No
4 – Commercial (E)	57.4	58.2	58.2	59.0	+0.8 / +0.8	No / No
5 – Single Family Residential (SE)	53.3	54.0	53.6	54.4	+0.3 / +0.4	No / No

³⁷ Kunzman Associates, Inc. Center Street Warehouse Project Traffic Impact Analysis. January 19, 2016

6 – Single Family Residential (SE)	60.7	61.4	60.9	61.8	+0.2 / +0.4	No / No
7 – Single Family Residential (NW)	60.2	61.1	60.9	61.8	+0.7 / +0.7	No / No
Bolded noise levels exceed 55 dBA exterior threshold for residential uses.						

Mitigation Measures

N-1 The following measures are required to ensure that project-related short-term construction noise levels are reduced to within the allowable levels of 70 dBA for industrial uses and 65 dBA for recreation facilities. Prior to issuance of demolition permits, a construction noise mitigation plan verifying the effectiveness in complying with the following measures shall be prepared and submitted for review by the Planning Director. Should construction noise exceed allowable levels after implementation of the following measures, the use of sound curtains or other noise barriers shall be required. The construction noise mitigation plan shall identify the type and location of sound curtains or other noise barriers to be utilized to reduce construction noise to within allowable levels. These mitigation measures shall be periodically monitored by the Planning Director, or designee, during routine construction inspections.

- Stationary construction noise sources such as generators or pumps must be located at least 100 feet from sensitive land uses, as feasible, or at maximum distance when necessary to complete work near sensitive land uses.
- Construction staging areas must be located as far from noise sensitive land uses as possible.
- Throughout construction, the contractor shall ensure all construction equipment is equipped with factory-provided noise attenuating devices and that they are properly maintained.
- Idling equipment must be turned off when not in use.
- Equipment must be maintained so that vehicles and their loads are secured from rattling and banging.

b) Less than Significant Impact. Vibration is the movement of mass over time. It is described in terms of frequency and amplitude and unlike sound; there is no standard way of measuring and reporting amplitude. Vibration can be described in units of velocity (inches per second) or discussed in decibel (dB) units in order to compress the range of numbers required to describe vibration. Vibration impacts to buildings are generally discussed in terms of peak particle velocity (PPV) that describes particle movement over time (in terms of physical displacement of mass). For purposes of this analysis, PPV will be used to describe all vibration for ease of reading and comparison. Vibration can impact people, structures, and sensitive equipment. The primary concern related to vibration and people is the potential to annoy those working and residing in the area. Vibration with high enough amplitudes can damage structures (such as crack plaster or destroy windows). Groundborne vibration can also disrupt the use of sensitive medical and scientific instruments such as electron microscopes. Common sources of vibration within communities include construction activities and railroads.

According to the Caltrans vibration manual, large bulldozers, vibratory rollers (used to compact earth), and loaded trucks utilized during grading activities can produce vibration, and depending on the level of vibration, could cause annoyance at uses within the project vicinity or damage structures. Caltrans has developed a screening tool to determine if vibration from construction equipment is substantial enough to impact surrounding uses. The Caltrans vibration manual establishes thresholds for vibration impacts on buildings and humans. These thresholds are summarized in Table 14 (Vibration Damage Potential Threshold Criteria) and Table 15 (Vibration Annoyance Potential Threshold Criteria).

Table 14
Vibration Damage Potential Threshold Criteria

Structural Integrity	Maximum PPV (in/sec)	
	Transient	Continuous
Historic and some older buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial and commercial structures	2.00	0.50
Source: Caltrans 2013		

Table 15
Vibration Annoyance Potential Threshold Criteria

Human Response	PPV Threshold (in/sec)	
	Transient	Continuous
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.90	0.10
Severely perceptible	2.00	0.40
Source: Caltrans 2013		

Construction Vibration

Construction activities that use vibratory rollers and bulldozers are repetitive sources of vibration; therefore, the *continuous* threshold is used. Industrial uses are located to the north and east of the project site. As a worst case scenario, the *historic and some older buildings* threshold is used. Based on the threshold criteria summarized in Tables 13 and 14, vibration from use of heavy construction equipment for the proposed project would be below the thresholds to cause damage to nearby structures and result in less than *barely perceptible* vibration at the four receptors shown in Table 16 (Distances to Vibration Receptors) and Table 17 (Construction Vibration Impacts).

Table 16
Distances to Vibration Receptors

Receptors	Distance from Center of Project Site (ft)
1 – Industrial (N)	640
2 – Industrial (E)	510
3 – Industrial (S)	421
4 – Park (S)	544

Table 17
Construction Vibration Impacts

Receptors	Equipment	PPVref	Distance (feet)	PPV
1 – Single Family Home (NE)	Vibratory Roller	0.21	640	0.0031
2 – Storage Facility (N)	Vibratory Roller	0.21	510	0.0042
3 – Single Family Home (E)	Vibratory Roller	0.21	421	0.0053
4 – Single Family Home (E)	Vibratory Roller	0.21	544	0.0038
1 – Single Family Home (NE)	Large Bulldozer	0.089	640	0.0013
2 – Storage Facility (N)	Large Bulldozer	0.089	510	0.0018
3 – Single Family Home (E)	Large Bulldozer	0.089	421	0.0023
4 – Single Family Home (E)	Large Bulldozer	0.089	544	0.0016
1 – Single Family Home (NE)	Loaded Truck	0.076	640	0.0011
2 – Storage Facility (N)	Loaded Truck	0.076	510	0.0015
3 – Single Family Home (E)	Loaded Truck	0.076	421	0.0019
4 – Single Family Home (E)	Loaded Truck	0.076	544	0.0014
Source: MIG Hogle-Ireland, June 2015				

Construction of the project does not require rock blasting, pile driving, or the use of a jack hammer, but will use a vibratory roller, and large bulldozer, and loaded trucks. All of the receptors will experience less than *barely perceptible* vibration from construction of the proposed project. Furthermore, these construction activities will be limited to the hours of 7:00 AM to 7:00

PM Mondays through Friday and the hours of 8:00 AM to 5:00 PM on Saturdays. With regard to long-term operational impacts, activities associated with the project will not result in any vibration-related impacts to adjacent or on-site properties. Construction-related vibration impacts will be less than significant.

Operational Vibration

Operation of the proposed project will include heavy-duty truck traffic along Center Street. According to the Federal Transit Administration (FTA), "It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads."³⁸ Furthermore, the FTA recognizes that "Building damage is not a factor for normal transportation projects, with the occasional exception of blasting and pile-driving during construction. Caltrans notes that heavy trucks can impart groundborne vibration when the pavement is not smooth."³⁹ Recognizing the proximity of the Trujillo Adobe structure located east of the project site, north of Center Street, and west of Orange Street (APN 246-082-002), despite the rarity of potential structural impact due to normal-course transportation patterns, potential building damage due to project operation has been analyzed.

As estimated by Kunzman Associates, the proposed project is anticipated to generate 148 heavy-duty trucks per day, with a maximum of 28 heavy-duty trucks during the AM and PM peak hour. Although truck trips will occur periodically, the *continuous* threshold has been utilized to provide a worst-case analysis. According to the Caltrans Transportation and Construction Vibration Guidance Manual, truck-related vibration levels of 0.006-0.019 are unlikely to cause damage to buildings of any type. In addition, the Manual shows that the recommended upper limit of vibration to which ruins and ancient monuments should be subjected is 0.08, which would include buildings in the condition of the Trujillo Adobe. The adobe structure is located approximately 88 feet from the centerline of the nearest lane on Center Street. According to Caltrans, the highest truck traffic vibrations generated on freeway shoulders is 0.079 PPV with average speed of 55 mph. At 88 feet, and at speeds well below freeway speeds, the vibration level reaching the Adobe structure is estimated to be 0.015 PPV. This is well below the upper limit of 0.08 recommended for ruins and ancient monuments and within the range whereby vibration impacts from trucks on Center Street are unlikely to cause damage to buildings of any type. Given the distance of the Trujillo Adobe to the project site and Center Street, vibration impacts from construction and operation of the proposed project on the Trujillo Adobe will be negligible. In addition, the Caltrans Transportation and Construction Vibration Guidance Manual provides alternative thresholds, as summarized in Table 18 (Vibration Criteria for Buildings). As shown in Table 18, periodic heavy truck traffic occurring along Center Street will not exceed vibration criteria for structural damage to historic and sensitive buildings based on these additional criteria. Therefore, operational vibration impacts will be less than significant.

Table 18
Vibration Criteria for Buildings

Criteria	Building Type	Continuous Threshold PPV (in/sec)
Swiss Association of Standardization	Class IV: Construction very sensitive to vibration; objects of historic interest	0.12
Konan	Historic and Sensitive Buildings	0.12
AASHTO	Historic Sites or other critical locations	0.10

Source: Caltrans 2013

c) **Less than Significant Impact.** A substantial increase in ambient noise is an increase that is *barely perceptible* (3 dBA). Operationally, the proposed project will result in periodic landscaping and other occasional noise generating activities. These activities are common in urban uses and do not represent a substantial increase in periodic noise in consideration that the project site is located in an industrialized area.

³⁸ Federal Transit Administration. Transit Noise and Vibration Impact Assessment. May 2006

³⁹ California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013

Traffic noise levels will not increase more than 3 dBA as a result of the proposed project as shown in

Table 19 (Peak Hour Change in Noise Levels). In addition, the ambient noise measurements at the northern and southern boundaries of the project site is generally consistent with the modeled roadway noise levels with project. Therefore, impacts will be less than significant.

Table 19
Peak Hour Change in Noise Levels

Receptors	Without Project dBA CNEL	With Project dBA CNEL	Difference	Significant?
1 – Industrial (N)	62.5	62.7	0.2	No
2 – Industrial (E)	70.1	70.1	--	No
3 – Industrial (S)	57.2	57.2	--	No
4 – Park (S)	54.1	54.1	--	No
5 – Commercial (E)	62.7	62.7	--	No
6 – Single Family Home (E)	61.0	61.0	--	No
7 – Single Family Home (E)	65.8	65.8	--	No
8 – Single Family Home (W)	65.4	65.4	--	No

d) **Less than Significant Impact with Mitigation Incorporated.** As discussed in question a) above, implementation of Mitigation Measures N-1 will feasibly reduce temporary construction noise to within the allowable noise levels at neighboring land uses. Impacts related to temporary construction noise will be less than significant with mitigation incorporated.

Operationally, the project will result in periodic landscaping and other occasional noise generating activities. These activities are common in industrial uses and do not represent a substantial increase in periodic noise in consideration that the project vicinity is characterized primarily by industrial uses. Furthermore, the project is subject to Zoning Code Section 7.25.010 that limits noise levels to 70 dBA for industrial land uses. With compliance with this existing regulation, periodic operational noise increases will be less than significant.

e,f) **No Impact.** The proposed project is not located within two miles of a public or private airstrip or within an airport land use plan. No impacts will occur.

4.13- Population and Housing

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
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)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) **Less than Significant Impact.** The 2012 Regional Transportation Plan (RTP) growth projections are developed utilizing a comprehensive analysis of fertility, mortality, migration, labor force, housing units, and local policies such as land use plans. Growth projections for the 2012 RTP predicted a citywide employment growth between 2008 and 2020 of approximately 45,800 and 66,300 by 2035. Based on average employees per square foot of warehouse in Riverside County, the proposed project is estimated to generate 530 new employees in the area.⁴⁰ This project would accommodate additional local employment that is well within the growth forecasts developed for the RTP. Furthermore, the project does not include any infrastructure extension or expansion and therefore will not result in any indirect population growth. Impacts will be less than significant.

b) **No Impact.** The project site is primarily vacant with one single family residence and five ancillary structures located on the southeastern corner of the project site. The proposed project will require the removal of one single family residence and five ancillary structures. As stated in the Historical/Archaeological Resources Survey Report (Appendix D), the existing structures are in a dilapidated condition. The owner of the existing single family residence and ancillary structures has voluntarily sold the property and will vacate voluntarily. Because the existing single family residence and ancillary structures have been voluntarily sold and are in dilapidated condition, removal of this residence will not result in the displacement of housing units that are in good condition and will not result in necessitating the construction of replacement housing elsewhere. No impact will occur.

c) **No Impact.** Displacement, in the context of housing, can generally be defined as persons or groups of persons who have been forced or obliged to flee or to leave their homes or places of habitual residence.⁴¹ One single family residence and five ancillary structures are located on site. The single family residence is currently owner-occupied. Existing residents of this structure will not be displaced in that the property owner has voluntarily sold the property and will voluntarily vacate the residence. As such, there is no *forced or obliged* removal of persons, and therefore no displacement. No impact will occur.

⁴⁰ The Natelson Company, Inc. Employment Density Study Summary Report. October 31, 2001

⁴¹ The Brookings Institute. Handbook for Applying the Guiding Principles on Internal Displacement. 1999.

4.14- Public Services

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☒	☐

a) Less than Significant Impact. The City of Riverside Fire Department provides fire protection and emergency medical response services in the City of Riverside. The project site is primarily serviced by Station No. 6, located at 1077 Orange Street, approximately one mile south of the project site.

The project is a proposed development of a primarily vacant site in a primarily industrial area. The project is located within the service area of the Riverside Fire Department, which has 14 stations. Therefore, the project will not have a significant impact on fire response times and will not otherwise create a substantially greater need for fire protection services than already exists that would necessitate construction of new facilities. No new or expanded fire protection facilities would be required as a result of this project because the project is within the existing service area of the Fire Department. Furthermore, the proposed project does not propose to use substantially hazardous materials or engage in hazardous activities that will require new or modified fire protection equipment to meet potential emergency demand. Any incremental impacts on level of service will be offset by the payment of development impact fees and property taxes. Impacts related to expansion of fire protection services will be less than significant.

b) Less than Significant Impact. The City of Riverside Police Department provides police protection services in the City of Riverside. The project site is served by the Orange Station located at 4102 Orange Street, approximately 4.2 miles south of the project site.

The proposed project will not result in any unique or more extensive crime problems that cannot be handled with the existing level of police resources. The proposed project is located within the Riverside Police Department service area. No new or expanded police facilities will need to be constructed as a result of this project because the project is within the existing service area of the Police Department. Any incremental impacts on level of service will be offset by the payment of development impact fees and property taxes. Impacts related to expansion of police protection services will be less than significant.

c) Less than Significant Impact. The proposed project will result in indirect incremental population growth and potential associated growth in students, within the Riverside Unified School District. In accordance with California Government Code and the Riverside Unified School District, a standard school facility impact fee will be paid to offset any incremental impacts of the proposed project. Impacts to the school facilities will be less than significant.

d) No Impact. The proposed project will not result in direct population growth that would incrementally impact recreation facilities. Impacts to recreation facilities are further discussed in Section 4.15 (Recreation). Any expansion or new construction of recreation facilities resulting from the proposed project will be subject to its own environmental review pursuant to CEQA. No impact will occur.

e) Less than Significant Impact. The proposed project will result in employment growth and indirectly in population growth that would incrementally impact other public services such as libraries or hospitals. Any incremental impact would be addressed through payment of property taxes that go to serve City and County public services. With the payment of development impact fees and property taxes, a less than significant impact will occur.

4.15- Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) **No Impact.** The proposed project will not directly result in population growth that would impact recreation facilities. However, the addition of employees to the project vicinity will result in increased use of local park facilities. Pursuant to Riverside Municipal Code Chapters 16.60 (Local Park Development Fees) and 16.44 (Regional Parks and Reserve Parks Development Fee), a Local Park Development Fee and a Regional Park and Reserve Park Development Fee is imposed on the construction or placement of all nonresidential units and new dwelling units. Dedication of park land in lieu of payment of all or a portion of the Local Park Development Fee may be accepted by the City Council. Credits for Regional Park Fees can be requested with the donation of land adjoining a regional park or land that is situated in a planned regional park or reserve park as shown in the City's General Plan. With payment of the required Park Development Fees, dedication of land in lieu of payment, or donation of land to the regional park system, no impact will occur.

b) **No Impact.** The proposed project requires no on- or off-site construction of recreational facilities. No impact will occur.

4.16- Transportation and Traffic

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
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?	☐	☐	☒	☐
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?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐

a) **Less than Significant Impact.** Operation of the proposed project could reduce the performance of the circulation system if the project-related vehicle trips or any proposed improvements decrease the Level of Service (LOS) on existing streets. In addition, impacts could occur if project improvements reduce the performance of any mode of transportation including mass transit and non-motorized travel.

The project site has been designed to take direct access via two driveways on Center Street. Center Street is a two-lane undivided roadway that is aligned east to west. Regional access to the project site is provided by I-215 freeway, SR-60 freeway, and SR-91 freeway.

Trip Generation

Trip generation was estimated based on the Institute of Transportation Engineers 9th edition *Trip Generation* manual. The Traffic Impact Analysis prepared by Kunzman Associates determined trip generation rates for daily trips, morning peak hour inbound and outbound trips, and evening peak hour inbound and outbound trips for the proposed land use (See Appendix H). The report indicates that the proposed development is projected to generate approximately 1,576 daily vehicle trips in Passenger Car Equivalent's, 301 of which will occur during the morning peak hour and 303 of which will occur during the evening peak hour.⁴²

To assess Opening Year traffic conditions, existing traffic is combined with areawide growth to characterize Opening Year conditions and potential impacts. The Opening Year for analysis purposes in this report is 2017. To account for areawide growth on roadways, traffic volumes have been calculated based on a conservative 2.0 percent annual growth rate of existing traffic volumes. The results of the Opening Year analysis are summarized in Table 20 (Opening Year (2017) Intersection Performance).

Table 20
Opening Year (2017) Intersection Performance

Intersection	Peak Hour	Without Project		With Project			
		Delay*	LOS	Delay*	LOS	Project Impact	Significant Impact?
Main St/Riverside Ave at Center St	AM	15.8	C	17.5	C	1.7	No
	PM	16.9	C	24.5	C	7.6	No
Orange St at Center St	AM	8.8	A	11.5	B	2.6	No
	PM	10.5	B	15.7	C	5.2	No
Stephens Ave at Center St	AM	13.8	B	16.2	B	2.4	No
	PM	12.2	B	13.2	B	1.0	No
W La Cadena at Stephens Ave/I-215 SB Ramps	AM	15.2	C	18.1	C	2.9	No
	PM	23.3	C	30.8	D	7.5	No
E La Cadena at Highgrove/I-215 NB Ramps	AM	9.1	A	10.0	A	0.9	No
	PM	10.1	B	10.6	B	0.5	No
Highgrove at Center St	AM	13.6	B	19.9	C	6.3	No
	PM	12.6	B	14.6	B	2.0	No
Iowa Ave/I-215 NB Ramps at La Cadena	AM	99.0	F	99.8	F	0.8	No
	PM	155.7	F	156.2	F	0.5	No
Iowa Ave at Main St	AM	17.8	B	18.9	B	1.1	No
	PM	17.2	B	21.5	C	4.3	No
Iowa Ave at Center St	AM	18.9	B	20.0	B	1.1	No
	PM	17.8	B	18.7	B	0.9	No

* = Delay is in seconds.
Source: Kunzman Associates, 2016

The study area intersections are projected to operate at acceptable Levels of Service during the peak hours, except for Iowa Avenue/I-215 Freeway northbound ramps at La Cadena Drive, which is projected to operate at unacceptable Levels of

⁴² Kunzman Associates, Inc. Center Street Warehouse Project Traffic Impact Analysis. January 19, 2016

Service under Without Project conditions without improvement. A significant impact occurs at a study intersection when the addition of project-generated trips causes either peak hour Level of Service to degrade from acceptable Level of Service (A through D) to unacceptable Level of Service (E or F) or if the proposed project result in increases in peak hour delay by ten seconds for LOS A through B, eight seconds for LOS C, five seconds for LOS D, two seconds for LOS E, and one second for LOS F.

As shown in Table 20, the proposed project does not significantly impact study area intersections under Opening Year 2017 With Project traffic conditions. Impacts will be less than significant.

b) **Less than Significant Impact.** The proposed project could result in significant impacts if it conflicts with the Riverside County Congestion Management Program (CMP) through reducing the Level of Service of a non-exempt segment to fall to "F". If LOS for a non-exempt segment is reduced to "F", a deficiency plan outlining specific mitigation measure and a schedule for mitigating the deficiency will be required. The nearest affected CMP designated freeways are I-215, SR-60, and SR-91 and the nearest arterial link is Main Street. A traffic study was not required because the proposed project will result in less than 50 peak hour trips; therefore, LOS on CMP designated freeways and roadways will not occur. Impacts will be less than significant.

c) **No Impact.** The proposed project is not located within two miles of an airport or private air strip. The proposed building would not encroach into air traffic space and this project would have no effects on demand for local air service or volumes of air traffic. The proposed project will not alter air traffic patterns, therefore no impact will occur.

d) **Less than Significant Impact.** If the project will substantially increase hazards due to a design feature, a significant impact could occur. No existing traffic hazards are known to exist in the immediate vicinity of the project. Roadways and intersections provide sufficient sight distance to limit the potential of any hazards and stop signs and traffic signals are placed at intersections to safely control traffic movements. The Traffic Impact Analysis prepared by Kunzman Associates included in its recommendation that sight distance at each project access should be reviewed with respect to California Department of Transportation/City of Riverside standards in conjunction with the preparation of final grading, landscaping, and street improvement plans. Impacts from the project will be less than significant to any potentially existing or future traffic hazard.

e) **Less than Significant Impact.** The proposed project will be accessible via two 40-foot wide driveways on Center Street. Interior drive aisles along the western, eastern, and southern sides of the building will have a minimum width of 40 feet to provide adequate truck and emergency access as required by the Fire Department. The interior drive aisle along the northern side of the building will be 24 feet wide and provide access for passenger vehicles. Access and turning radii entering the site and within the site are adequate to serve the site in case of an emergency. Therefore, the project will have less than significant impacts on the provision of adequate emergency access.

f) **Less than Significant Impact.** The project will not result in conflicts with adopted policies or plans related to alternative modes of travel, such as bus transit, bicycles or walking paths. The project is not located adjacent to or near an existing bike path or pedestrian facilities it could conflict with, nor does the City have adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities that apply to the proposed project site. Therefore, a less than significant impact will occur.

4.17- Utilities and Service Systems

Would the project:

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☐	☒
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
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?	☐	☐	☒	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

a) **Less than Significant Impact.** The proposed project could affect Regional Water Quality Control Board treatment standards by increasing wastewater production, which would require expansion of existing facilities or construction of new facilities. Exceeding the RWQCB treatment standards could result in contamination of surface or ground waters with pollutants such as pathogens and nitrates.

The City of Riverside Public Works Department provides sewer service to the project area. The City of Riverside Public Works Department provides for the collection, treatment and disposal of wastewater at the project site through its Riverside Regional Water Quality Treatment Plant (RRWQCP) and complies with state and federal requirements governing the

treatment and discharge of wastewater. The wastewater collection system includes over 776 miles of gravity sewers that range in size from six to 54 inches in diameter and includes 18 wastewater pump stations. According to the City of Riverside 2010 Urban Water Management Plan, RRWQCP treats approximately 34 million gallons per day (MGD). The capacity of the plant is 40 MGD. The plant is currently being expanded and retrofitted to meet the needs of future generations. This expansion will increase the capacity to 46 MGD by the end of 2015. With improved treatment processes being added, the ultimate plant capacity is anticipated to be 52 MGD.⁴³ Final plant expansion is anticipated to occur in 2026. Sewer connection fees will be determined as outlined under Section 14.08.080 of the City's Municipal Code. Wastewater flows associated with the proposed project would consist of the same kinds of substances typically generated by commerce use and no modifications to any existing wastewater treatment systems or construction of any new ones would be needed to treat this project's wastewater. Estimated wastewater generated by the proposed development is approximately 161,790.3 gallons per day (gpd) (wastewater is estimated to be 80 percent of total water use). This volume is within RRWQCP's remaining treatment capacity (40 MGD – 34 MGD = 6 MGD). This project would thus have a less-than-significant impact on the ability of the RRWQCP to operate within its established wastewater treatment requirements, which are enforced via the facility's NPDES permit authorized by the Santa Ana Regional Water Quality Control Board (SARWQCB). Therefore, the project will have a less than significant impact related to wastewater treatment requirements of the SARWQCB.

b) **Less than Significant Impact.** The City of Riverside's water supply is primarily groundwater, extracted by production wells from the Bunker Hill Basin, Riverside North, and Riverside South. Additional sources of water include groundwater from the Rialto-Colton Basin, recycled water from the City of Riverside's Regional Water Quality Control Plant (RWQCP), and imported water from WMWD through a connection at the Metropolitan Water District of Southern California's Henry J. Mills Treatment Plant. The Riverside Public Utilities Department provides water service to the project area, and will provide water service to the proposed project upon completion of financial arrangements and compliance with the Department's Rules and Regulations for the installation of water facilities. Sections 10910-10915 of the state Water Code require the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for any industrial development with more than 1,000 employees or over 650,000-square feet of floor area, or the equivalent thereof. As the project is below the established thresholds, no WSA is required.⁴⁴ The Riverside Public Utilities Department (RPU) projects adequate water supplies for the project area based upon current water supply and projected growth rates, estimated between 2015 and 2035.⁴⁵ The 2010 water usage in the RPU service area was approximately 83,300 AFY and is expected to increase steadily through to 2035. The proposed water use in 2035 is estimated to be 119,800 AFY, an increase of 36,500 AFY. Groundwater supplies will be augmented through three conjunctive use projects: Seven Oaks Dam Conservation Project, Riverside North Aquifer Storage and Recovery Project, and Pellisier Ranch Aquifer Storage and Recovery Project, and through increased use of recycled water. Total available water (including groundwater, conjunctive use projects, recycled water, and imported water from MWD) to the Riverside Public Utilities service area is estimated to reach 143,226 AFY by 2035, which is more than sufficient to meet the estimated 2035 water demand. Based on CalEEMod assumptions, the proposed project's estimated water demand is approximately 226.5 AFY. The proposed project is designed to support typical commerce use. Should a heavy utility use be proposed as a tenant, further City review and approval will be required.

Regarding wastewater facilities, as discussed in the preceding response, wastewater generated at the project site is treated at the Riverside Regional Water Quality Treatment Plant (RRWQCP). The proposed project is estimated to have a wastewater generation of approximately 161,790.3 gpd. This generation is well within the existing remaining treatment capacity of the RRWQCP.

Connections to local water and sewer mains would involve temporary and less than significant construction impacts that would occur in conjunction with other on-site improvements. No additional improvements are needed to either sewer lines or treatment facilities to serve the proposed project. Standard connection fees will address any incremental impacts of the

⁴³ City of Riverside Public Utilities. Final 2010 Urban Water Management Plan. July 2011.

⁴⁴ Correspondence with Michael L. Plinski, P.E., Senior Water Engineer, Riverside Public Utilities. November 26, 2013.

⁴⁵ City of Riverside Public Utilities. Final 2010 Urban Water Management Plan. July 2011.

proposed project. Therefore, the project will result in less than significant impacts as a result of new or expanded wastewater treatment facilities.

c) **No Impact.** Potentially significant impacts could occur as a result of this project if storm water runoff was increased to a level that would require construction of new storm drainage facilities. As discussed in the Hydrology section, the proposed project would not generate any increased runoff from the site that would require construction of new storm drainage facilities. The City's NPDES permit requires most new development projects to incorporate best management practices to minimize pollutant levels in runoff. Pursuant to Riverside Municipal Code Chapter 14.12 (Discharge of Wastes into Public Sewer and Storm Drain Systems), all construction projects shall apply Best Management Practices (BMPs) such as sediment barriers, plastic sheeting, detention ponds, filters and berms to prevent erosion. Implementation of BMPs would reduce pollutants in stormwater and urban runoff from the project site. The proposed storm drainage system and BMPs must be designed to the satisfaction of the City's Public Works Director and in conformance with all applicable permits and regulations. The project applicant/developer would be required to provide all necessary on-site infrastructure. The project will have a less than significant impact on requiring the construction of new facilities or expansion of existing storm drainage facilities.

d) **Less than Significant Impact.** The project could result in significant impacts if the project required additional water supplies than are currently entitled. Water demand is provided by survey data utilized in CalEEMod. Water demand is estimated at 73,816,810 gallons per year or 226.5 acre feet per year. Water demand within the Riverside Public Utilities service area is projected to be 119,800 AFY by 2035. The proposed project's estimated water demand is approximately 226.5 AFY, which is within RPU's remaining capacity. Based on the City of Riverside 2010 Urban Water Management Plan (UWMP), the City's service area is approximately 80 percent built out with approximately 15 percent vacant land available for development. The Bunker Hill Basin is managed to maintain adequate future water supplies through future conjunctive use projects, increased use of recycled water, and water imported from MWD. The project would not substantially deplete water supplies, and the project would have a less than significant impact on entitled water supplies.

e) **Less than Significant Impact.** As detailed in Sections 4.17.a) and 4.17.b), the proposed project will be adequately served by existing facilities. Therefore a less than significant impact will occur.

f) **Less than Significant Impact.** Significant impacts could occur if the proposed project will exceed the existing permitted landfill capacity or violates federal, state, and local statutes and regulations. The City of Riverside Public Works Department collects trash from 70 percent of all households. The remaining portions of the City's solid waste are serviced by private collectors.⁴⁶ Regional landfill capacity fluctuates daily and is regularly monitored by the County Sanitation Districts of Riverside County to ensure there is sufficient landfill space available to dispose of municipal solid wastes throughout the region. This project's additional solid waste stream would have a less than significant impact on regional landfill capacity. Cities must meet the 50% landfill diversion mandate required by State law. General Plan Policy PF-5.1 states that waste should be diverted from landfills and states that the City should achieve 100% recycling citywide for both residential and non-residential development. In 2013, the per employee disposal rate was 14.0 pounds per day, below the target of no more than 19.5 pounds per day.⁴⁷ According to the California Department of Resources Recycling and Recovery (CalRecycle), the City disposes of waste at several area landfills, including:

- Badlands Sanitary Landfill
- El Sobrante Landfill
- Puente Hills Landfill (Closed 2013)
- Olinda Alpha Sanitary Landfill
- San Timoteo Sanitary Landfill

⁴⁶ Albert A. Webb Associates. City of Riverside General Plan 2025 Program Environmental Impact Report. July 2007.

⁴⁷ CalRecycle. Facility/Site Summary Details, Jurisdiction Diversion/Disposal Rate Summary.
<http://www.calrecycle.ca.gov/LGCentral/reports/diversionprogram/JurisdictionDiversionPost2006.aspx> [June 2015]

- Simi Valley Landfill & Recycling Center
- California Street Landfill
- Mid-Valley Sanitary Landfill
- Azusa Land Reclamation Co. Landfill
- Chiquita Canyon Sanitary Landfill
- Antelope Valley Public Landfill
- American Avenue Disposal Site
- McKittrick Waste Treatment Site

The majority of waste in 2013 went to the Badlands Sanitary Landfill and the El Sobrante Landfill.⁴⁸ The Badlands Sanitary Landfill, located in Moreno Valley, has a permitted daily capacity of 4,000 tons, with a permitted total capacity of 33,560,993 cubic yards and a remaining capacity of 14,730,025 cubic yards. This landfill is projected to close in 2024.⁴⁹ The El Sobrante Landfill, located in Corona, has a permitted daily capacity of 16,054 tons per day and a total capacity of 184,930,000 tons, with a remaining capacity of 145,530,000 tons. This landfill is estimated to close in 2045.⁵⁰ Although these existing landfills currently used by Riverside are anticipated to close in 2024 and 2045, other regional landfills have remaining capacity. Also, regional plans are underway to transport waste by rail to landfill sites in the desert areas to the east.

Different uses have varying levels of estimated solid waste production. Using the default calculations in the CalEEMod model, the proposed project will generate approximately 289.5 tons of solid waste per year. There is adequate landfill capacity in the region to accommodate project-generated waste. Considering the availability of landfill capacity and the relatively nominal amount of solid waste generation from the proposed project, project solid waste disposal needs can be adequately met without a significant impact on the capacity of the nearest and optional, more distant, landfills. Therefore, it is not expected that the proposed project would impact the City's compliance with state-mandated (AB 939) waste diversion requirements. Impacts will be less than significant.

g) **No Impact.** The proposed project is required to comply with all applicable federal, state, County, and City statutes and regulations related to solid waste as a standard project condition of approval. Therefore, no impact will occur.

⁴⁸ CalRecycle. Jurisdiction Disposal by Facility. <http://www.calrecycle.ca.gov/LGCentral/Reports/DRS/Destination/JurDspFa.aspx> [June 2015]

⁴⁹ CalRecycle. Facility/Site Summary Details: Badlands Sanitary Landfill (33-AA-0006) <http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0006/Detail/> [June 2015]

⁵⁰ CalRecycle. Facility/Site Summary Details: El Sobrante Landfill (33-AA-0217) <http://www.calrecycle.ca.gov/SWFacilities/Directory/33-AA-0217/Detail/> [June 2015]

4.18- **Mandatory Findings of Significance**

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a) Does the project have the potential to 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 endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
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 the past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) **Less than Significant with Mitigation Incorporated.** The proposed project would not substantially impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 4.1. The proposed project would not significantly impact any sensitive plants, plant communities, fish, or wildlife, as discussed in Section 4.4. Mitigation Measures BIO-1, BIO-2, and BIO-3 have been incorporated to ensure that impacts to potential nesting birds and roosting bats would remain less than significant. Adverse impacts to historic resources would not occur. Construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading, consistent with Mitigation Measures CUL-1 through CUL-5. This site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section 4.2 concludes that impacts related to emissions of criteria pollutants and other air quality impacts will be less than significant. Section 4.7 concludes that impacts related to climate change would be less than significant. Section 4.9 concludes that impacts related to hydrology and water quality will be less than significant. Based on the preceding analysis of potential impacts in the responses to items 4.1 thru 4.17, no evidence is presented that this project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated.

b) **Less than Significant with Mitigation Incorporated.** Cumulative impacts can result from the interactions of environmental changes resulting from one proposed project with changes resulting from other past, present, and future projects that affect the same resources, utilities and infrastructure systems, public services, transportation network elements,

air basin, watershed, or other physical conditions. Such impacts could be short-term and temporary, usually consisting of overlapping construction impacts, as well as long term, due to the permanent land use changes involved in the project.

Non-Cumulative Impacts

Impacts related to aesthetics, geology and soils, and airport hazards at the project-level have no potential for cumulative impacts because impacts are limited to on-site conditions and include no component that could result in similar impacts over time or space. Therefore, no cumulative impacts related to these topics will occur.

Local Impacts

Projects can contribute considerably to cumulative impacts in context of the local environment. Local cumulative impacts are limited to agricultural and forestry resources, air quality, biological resources, cultural resources, hazardous materials, wildfires, groundwater levels, drainage and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation and traffic, and utilities and service systems. A general discussion of potentially significant cumulative impacts in the local context is summarized below.

The analysis provided in Sections 4.2 and 4.11 found that no individual impacts would occur; therefore, the project could not contribute considerably to local agricultural or mineral resources impacts. The analysis provided in Section 4 related to greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, transportation and traffic, and utilities and service systems found that impacts would be less than significant; therefore, while the project will contribute to localized cumulative impacts, the project contribution will not be considerable.

Impacts related to air quality, biological resources, cultural resources, and construction noise were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the project could contribute considerably to significant localized cumulative impacts in these topical areas. These topics are discussed in detail below.

Air Quality. The analysis provided in Section 4.3 related to air quality found that impacts would be less than significant and operations of the project will not exceed the South Coast Air Quality Management District's (SCAQMD) criteria pollutant thresholds. However, Mitigation Measure AQ-1 has been incorporated to ensure impacts related to a refrigerated warehouse use are properly analyzed and mitigated should future operation require a refrigerated use. Therefore, the project will not contribute to localized or regional cumulative impacts.

Biological Resources. The context for assessing cumulative impacts to local biological resources includes sensitive species and their habitat in the project vicinity. As discussed in Section 4.4, the project site lacks any substantial vegetation. Suitable coastal whiptail, coast horned lizard, and California horned lark habitat is on site but none were observed. Mitigation Measures BIO-1 and BIO-2 have been included to ensure that impacts to potential nesting birds would remain less than significant. Several species of bats are known to occur in the vicinity but were not observed on site. Mitigation Measure BIO-3 has been included to ensure that impacts to potential bats would remain less than significant. Therefore, the proposed project would not result in cumulative impacts related to the loss of sensitive species in the project area.

Cultural Resources. The context for assessing cumulative impacts to local archeological knowledge of our past is the geographical extent of local historic and pre-historic knowledge. Loss of on-site archaeological resources could reduce or eliminate important information relevant to the City of Riverside and/or the Inland Empire. Mitigation Measures CUL-1 through CUL-5 have been incorporated requiring evaluation of any discovered potential archaeological resources, the uniqueness of the archaeological sample, and appropriate steps to preserve or curate the artifact. This will eliminate any potential loss of important local archaeological information that may be buried under the project site; therefore, the project will have no contribution to a cumulative loss of important local archaeological knowledge.

Noise. The project is not a substantial source of operational noise, as discussed in Section 4.12, and therefore would not contribute considerably to noise levels in the immediate vicinity of the project. The project will contribute to temporary increase in noise levels in the immediate project vicinity during construction activities; however, Mitigation Measures N-1 will

be incorporated to minimize construction-related noise and therefore the project's contribution will not be considerable. The project will increase traffic in the project area; however, project traffic-related noise will not be discernable to the public and therefore will have no considerable contribution to cumulative traffic-related noise.

Regional Impacts

Projects can contribute considerably to cumulative impacts in context of the regional environment. Regional cumulative impacts are limited to air quality, biological resources, cultural resources, hazardous materials, wildfires, groundwater levels, drainage and water quality, flooding, land use and planning, mineral resources, transportation and traffic, and utilities and service systems. A general discussion of potentially significant cumulative impacts in the regional context is summarized below.

The analysis provided in Sections 4.2 and 4.11 found that no individual impacts would occur; therefore, the project could not contribute considerably to regional agricultural or mineral resources impacts. The analysis provided in Section 4 related to greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, transportation and traffic, and utilities and service systems found that impacts would be less than significant; therefore, while the project will contribute to regional cumulative impacts, the project contribution will not be considerable.

Impacts related to air quality, biological resources, cultural resources, and noise were found to be potentially significant and require mitigation to reduce to less than significant levels; therefore, the project could contribute considerably to significant localized cumulative impacts in these topical areas. These topics are discussed in detail below.

Air Quality. The context for assessing cumulative air quality impacts to the area is the extent to which project related emissions will contribute to a net increase of any criteria pollutant for which the project region is in non-attainment. The analysis provided in Section 4.3 related to air quality found that impacts would be less than significant. However, Mitigation Measure AQ-1 has been incorporated to ensure impacts related to a refrigerated warehouse use are properly analyzed and mitigated should future operation require a refrigerated use. Therefore, the project will not contribute to localized or regional cumulative impacts.

Biological Resources. The context for assessing cumulative impacts to regional biological resources includes sensitive species and their habitat in the Inland Empire. As discussed in Section 4.4, the project site lacks any substantial vegetation. Suitable coastal whiptail, coast horned lizard, and California horned lark habitat is on site but none were observed. Mitigation Measures BIO-1 and BIO-2 have been included to ensure that impacts to potential nesting birds would remain less than significant. Several species of bats are known to occur in the vicinity but were not observed on site. Mitigation Measure BIO-3 has been included to ensure that impacts to potential bats would remain less than significant. Therefore, the proposed project would not result in cumulative impacts related to the loss of sensitive species in the region.

Cultural Resources. The context for assessing cumulative impacts to regional archeological knowledge of our past is the geographical extent of regional historic and pre-historic knowledge. Loss of on-site archaeological resources could reduce or eliminate important information relevant to the City of Riverside and/or the Inland Empire. Mitigation Measures CUL-1 through CUL-3 have been incorporated requiring evaluation of any discovered potential archaeological resources, the uniqueness of the archaeological sample, and appropriate steps to preserve or curate the artifact. This will eliminate any potential loss of important local archaeological information that may be buried under the project site; therefore, the project will have no contribution to a cumulative loss of important regional archaeological knowledge.

Noise. The context for assessing cumulative noise impacts to the region is the extent to which temporary or permanent noise generating sources exist in the area. The project is not a substantial source of operational noise, as discussed in Section 4.12, and therefore would not contribute considerably to noise levels in the immediate vicinity of the project. The project will contribute to temporary increases in noise levels in the immediate project vicinity during construction activities; however, Mitigation Measure N-1 will be incorporated to minimize construction-related noise and therefore the project's

contribution will not be considerable. The project will increase traffic in the project area; however, project traffic-related noise will not be discernible to the public and therefore will have no considerable contribution to cumulative traffic-related noise.

Global Impacts

One topic of global concern is climate change. As discussed in Section 4.7, climate change is the result of numerous, cumulative sources of greenhouse gas emissions all over the world. The project will not contribute considerably to global climate change with implementation of existing regulations.

Based on the above analysis concerning the local, regional, and global impacts of the project in consideration of past, current, and future projects, the City of Riverside hereby finds that the contribution of the proposed project to cumulative impacts will be less than significant with mitigation incorporated.

c) **Less than Significant with Mitigation Incorporated.** Based on the analysis of the project's impacts in the responses to items 4.1 thru 4.17, there is no indication that this project could result in substantial adverse effects on human beings. While there would be temporary adverse effects during construction related to noise, these will be reduced to less than significant levels through mitigation and incorporation of standard requirements for noise. Less than significant long-term effects would include air quality, greenhouse gas emissions, hazards, population and housing, public services, traffic, utilities and service systems, and changing the visual character of the site, with a majority of these impacts affecting the project site itself. The analysis herein concludes that direct and indirect environmental effects will at worst require mitigation to reduce to less than significant levels. Generally, environmental effects will result in less than significant impacts. Based on the analysis in this Initial Study, the City finds that direct and indirect impacts to human beings will be less than significant with mitigation incorporated.

5.1 – List of Preparers

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5.2 – *Persons and Organizations Consulted*

None

6 Mitigation Monitoring Reporting Program

CENTER STREET COMMERCE BUILDING						
Mitigated Negative Declaration: Mitigation Monitoring Reporting Program						
Mitigation Measures		Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
					Initials	Date
Air Quality Mitigation Measure						
	If a refrigerated use is proposed for future operation of the development, the applicant shall prepare a new Air Quality and Climate Change Assessment which to analyze any new or increased potential impacts of a refrigerated use and determine the significance of potential impacts.					
AQ-1		Prior to issuance of building permits	Provide new AQ/CC analysis report showing less than significant impacts	Community Development Department		
Biological Resources Mitigation Measure						
	To avoid impacts to nesting birds, construction activities and construction noise should occur outside the avian nesting season (prior to February 1 or after September 1). If construction and construction noise occurs within the avian nesting season (during the period from February 1 to September 1), all suitable habitats shall be thoroughly surveyed for the presence of nests by a qualified biologist no more than five days before commencement of any vegetation removal. If it is determined that the project site is occupied by nesting birds, Mitigation Measure BIO-2 shall apply. Conversely, if the project site is found to be absent of nesting birds, Mitigation Measure BIO-2 shall not be required.					
BIO-1		Within 5 days before vegetation removal	Survey for presence of nests	Community Development Department		
BIO-2		Throughout construction	Establish required buffer area around sensitive bird nests and raptor nests	Community Development Department		
BIO-3	A pre-construction survey shall be conducted in suitable habitat (e.g., dilapidated sheds and trees) for roosting bats within 14 days prior to activities that remove vegetation or suitable structures. If an occupied maternity or colony roost is detected, CDFW shall be contacted about how to proceed. Typically, a bigger exclusion zone would be established around each occupied roost until bat activities have ceased. The size of the buffer would take into account: - Proximity and noise levels of project activities; - Distance and amount of vegetation or screening between the roost and construction activities; - Species-specific needs, if known, such as sensitivity to disturbance. Due to restrictions of the California Health Department, direct contact by	Within 14 days prior to vegetation or structure removal	Submit pre-construction survey and establish required buffer area	Community Development Department		

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workers with any bat is not allowed. The qualified bat biologist will be contacted immediately if a bat roost is discovered during project construction.						
Cultural Resources						
Archaeological Monitoring: At least 30-days prior to application for a grading permit and before any grading, excavation and/or ground disturbing activities on the site take place, the Project 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.						
a. 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: i. Project grading and development scheduling; ii. The development of a rotating or simultaneous schedule in coordination with the applicant and the Project Archeologist 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; iii. The protocols and stipulations that the Developer, City, Tribes and Project archaeologist will follow in the event of inadvertent cultural resources discoveries, including any newly discovered cultural resource deposits that shall be subject to a cultural resources evaluation; and iv. The scheduling and timing of the Cultural Sensitivity Training noted in Mitigation Measure CUL-3.	Prior to grading permits	Prepare and submit report	Community Development Department			
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: c. Temporary Curation and Storage: During the course of construction, all discovered resources shall be temporarily curated in a secure location onsite or at the offices of the project	In case of discovery	Contractor/Applicant Concurrence	Community Development Department			
CUL-2						

CENTER STREET COMMERCE BUILDING Mitigated Negative Declaration: Mitigation Monitoring Reporting Program					
Mitigation Measures	Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
				Initials	Remarks
archaeologist. The removal of any artifacts from the project site will need to be thoroughly inventoried with tribal monitor oversight of the process; and d. 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: iv. Accommodate the process for onsite 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 cataloging and basic recordation have been completed; v. A curation agreement with an appropriate qualified repository within Riverside County that meets federal standards per 36 CFR Part 79 and therefore would 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; vi. For purposes of conflict resolution, 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 iv. 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					

CENTER STREET COMMERCE BUILDING						
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Mitigation Measures	Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance		
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	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.					
CUL-3	Cultural Sensitivity Training: The 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.	Contractor/Applicant Concurrence	Community Development Department			
CUL-4	If paleontological materials are uncovered during grading or other earth moving activities, the contractor shall be required to halt work in the immediate area of the find, and to retain a professional paleontologist to examine the materials to determine whether it is a significant paleontological resource. If this determination is positive, resource shall be left in place, if determined feasible by the project paleontologist. Otherwise, the scientifically consequential information shall be fully recovered by the paleontologist. Work may continue outside of the area of the find; however, no further work shall occur in the immediate location of the find until all information recovery has been completed and a report concerning it filed with the Community and Economic Development Director. The applicant shall bear the cost of implementing this mitigation.	Contractor/Applicant Concurrence	Community Development Department			
CUL-5	Cease Ground-Disturbing Activities and Notify County Coroner if Human Remains Are Encountered. If human remains are unearthed during implementation of the Proposed Project, the City of Riverside and the Applicant shall comply with State Health and Safety Code Section 7050.5. The City of Riverside and the Applicant shall immediately notify the County Coroner and no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendant (MLD). After the MLD has inspected the remains and the site, they have 48 hours to provide recommendations to the landowner. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human	Contractor/Applicant Concurrence	Community Development Department			

Mitigation Monitoring Reporting Program

CENTER STREET COMMERCE BUILDING						
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	Mitigation Measures	Monitoring Timing/ Frequency	Action Indicating Compliance	Monitoring Agency	Verification of Compliance	
					Initials	Remarks
	remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.					
Noise						
N-1	The following measures are required to ensure that project-related short-term construction noise levels are reduced to less-than-significant levels. Prior to issuance of demolition permits, a noise mitigation plan verifying that compliance with the following measures would reduce construction noise to within the allowable levels of 70 dBA for industrial uses and 65 dBA for recreation facilities. Should construction noise exceed allowable levels after implementation of the following measures, the use of sound curtains or other noise barriers shall be required. The noise mitigation plan shall identify the type and location of sound curtains or other noise barriers to be utilized to reduce construction noise to within allowable levels. - Stationary construction noise sources such as generators or pumps must be located at least 100 feet from sensitive land uses, as feasible, or at maximum distance when necessary to complete work near sensitive land uses. This mitigation measure must be implemented throughout construction and may be periodically monitored by the Planning Director, or designee during routine inspections. - Construction staging areas must be located as far from noise sensitive land uses as feasible. This mitigation measure must be implemented throughout construction and may be periodically monitored by the Planning Director or designee during routine inspections. - Throughout construction, the contractor shall ensure all construction equipment is equipped with included noise attenuating devices and are properly maintained. - Idling equipment must be turned off when not in use. - Equipment must be maintained so that vehicles and their loads are secured from rattling and banging.	Prior to issuance of demolition permits	Submit a mitigation plan	Building Department		

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Planning Commission - Exhibit 1 - Development Review Committee Staff Report
Development Review Committee - Exhibit 7 - CEQA Documents