

RESOLUTION NO.

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF RIVERSIDE, CALIFORNIA, CERTIFYING THE FINAL ENVIRONMENTAL IMPACT REPORT FOR THE CALIFORNIA BAPTIST UNIVERSITY SPECIFIC PLAN, MAKING CERTAIN FINDINGS OF FACT RELATED THERETO, ADOPTING A STATEMENT OF OVERRIDING CONSIDERATIONS, AND ADOPTING A MITIGATION MONITORING AND REPORTING PROGRAM, ALL PURSUANT TO THE CALIFORNIA ENVIRONMENTAL QUALITY ACT.

WHEREAS, an application submitted by California Baptist University to comprehensively amend and replace the existing California Baptist University Specific Plan, a Rezoning, a General Plan Amendment and a Specific Plan Amendment to remove the existing property from the Magnolia Avenue Specific Plan (“Project”) was presented for consideration; and

WHEREAS, in accordance with the requirements of the California Environmental Quality Act (“CEQA”) (Public Resources Code Section 21000 et seq.), the State of California CEQA Guidelines (“State CEQA Guidelines”) (California Code of Regulations Title 14, Chapter 3, Sections 15000 et seq.) and the City of Riverside (“City”) CEQA Guidelines (collectively “CEQA Regulations”) an Environmental Impact Report (“EIR”) was prepared for the Project; and

WHEREAS, in accordance with the requirements of Section 15082(a) of the State CEQA Guidelines, on May 2, 2016, the City prepared and distributed a Notice of Preparation (“NOP”) to all appropriate responsible and trustee agencies and to all organizations and individuals requesting notice, stating that an EIR would be prepared for the Project; and

WHEREAS, on May 2, 2016, the NOP was sent to the State Clearinghouse (SCH No. 2016051004); and

WHEREAS, all responses to the NOP were considered in the preparation of the Draft EIR and interested agencies and individuals were contacted to secure their input; and

WHEREAS, the Draft EIR was completed and a Notice of Completion (“NOC”) and the Draft EIR was filed with the State Clearinghouse on or about September 21, 2018, in accordance with the provisions of section 15085 of the State CEQA Guidelines; and

WHEREAS, copies of the Draft EIR were also sent to various public agencies, organizations and individuals, made available at the City’s Planning Division, the Riverside Main Library, Arlington Branch Library, and on the City’s website, and a Notice of Availability

1 (“NOA”) of the Draft EIR was published in the Riverside Press Enterprise, a newspaper of general  
2 circulation, mailed to a list of interested parties, and posted with the Riverside County Clerk’s  
3 Office; and

4 WHEREAS, the NOC and the NOA provided a 45-day public review period commencing  
5 on September 21, 2018, and ending on November 5, 2018; and

6 WHEREAS, the City received written and oral comments from the public and responsible  
7 agencies on the Draft EIR during this public comment period, as well as after the close of the  
8 public comment period; and

9 WHEREAS, all comments on the Draft EIR concerning environmental issues that were  
10 received during the public review period, as well as those received after the public review period,  
11 were evaluated by the City as the Lead Agency in accordance with Section 15088 of the State  
12 CEQA Guidelines; and

13 WHEREAS, the City Planning Commission held a duly noticed hearing on the Draft EIR  
14 on November 29, 2018, and made certain recommendations to the City Council; and

15 WHEREAS, the Final Environmental Impact Report dated December 13, 2018, for the  
16 Project consists of a Draft EIR dated September 21, 2018, comments and recommendations  
17 received on the Draft EIR, responses to comments on the Draft EIR, changes to the Draft EIR, and  
18 a Mitigation Monitoring and Reporting Program (collectively “FEIR”); and

19 WHEREAS, the FEIR includes comments received on the Draft EIR and written responses  
20 to those comments, the focus of which is on the disposition of significant environmental issues  
21 raised in the comments, as specified by CEQA Guidelines section 15088(b); and

22 WHEREAS, the FEIR contains the elements required by the CEQA Regulations, including,  
23 but not limited to: (a) identification, description and discussion of all potentially significant  
24 environmental effects of the proposed Project; (b) a description of mitigation measures proposed  
25 to minimize potential significant environmental effects on the project identified in the FEIR; (c) a  
26 description of those potential environmental effects which cannot be avoided or can be mitigated  
27 but not to a level of insignificance; (d) a description of a range of reasonable alternatives to the  
28 proposed Project and evaluation of the comparative merits and potential significant environmental

1 effects of the alternatives; (e) a discussion of cumulative impacts in accordance with the  
2 requirements of section 15130 of the State CEQA Guidelines; (f) a discussion of growth inducing  
3 impacts; (g) a discussion of significant irreversible environmental changes; (h) a discussion of  
4 energy conservation; and (i) a list of all federal, state and local agencies, other organizations and  
5 private individuals consulted in preparing the FEIR and the firm preparing the FEIR; and

6 WHEREAS, the City Council held a duly noticed hearing on the FEIR on January 8, 2019,  
7 at which time additional written and oral testimony was received; and

8 WHEREAS, the City Council has been presented with and is familiar with the information  
9 in the administrative record, including the Staff Reports and the written and verbal testimony  
10 submitted thereon, and has reviewed and considered the information in the FEIR for completeness  
11 and compliance with the CEQA Regulations, has independently reviewed and analyzed the FEIR  
12 and has duly heard and considered the Staff Reports and all written and oral arguments presented  
13 at its meeting of January 8, 2019; and

14 WHEREAS, the City has made the written findings set forth in Findings of Fact and  
15 Statement of Overriding Considerations (“Findings/SOC”) attached hereto as Exhibit “A” and  
16 incorporated herein by reference, for each potentially significant environmental impact identified  
17 in the FEIR pursuant to State CEQA Guidelines Section 15091 based upon all of the evidence in  
18 the administrative record, including, but not limited to the FEIR, written and oral testimony given  
19 at meetings and hearings, and submission of testimony from the public, organizations and  
20 regulatory agencies, and has determined that the Findings contain a complete and accurate  
21 reporting of the environmental impacts and mitigation measures associated with the Project, as  
22 well as complete and accurate reporting of the unavoidable impacts and benefits of the Project;  
23 and

24 WHEREAS, approval of the Project will result in significant effects which are identified  
25 in the FEIR that cannot be avoided or substantially lessened; and

26 WHEREAS, the City has stated in writing the specific reasons to support its action to  
27 approve the Project, despite its significant environmental impacts, based on the FEIR and other  
28

1 information in the record, including in the Findings/SOC set forth in Exhibit “A” attached hereto;  
2 and

3 WHEREAS, the City Council certifies that (1) the FEIR for the Project has been completed  
4 in compliance with CEQA; (2) that the FEIR was presented to the City Council, and that the City  
5 Council reviewed and considered the information contained in the FEIR prior to making a decision  
6 on the Project; and (3) the FEIR reflects the City’s independent judgment and analysis, and has  
7 reviewed and considered all comments received during the public review process and at the public  
8 hearings; and

9 WHEREAS, the City Council found that the Project identified in the FEIR incorporated  
10 alterations or mitigation measures that avoid or substantially lessen potentially significant  
11 environmental effects associated with the Project to the fullest extent feasible; and

12 WHEREAS, in accordance with the requirements of the CEQA Regulations, a Mitigation  
13 Monitoring and Reporting Program was prepared that identified (i) all feasible measures required  
14 to mitigate potentially significant impacts, and (ii) standards and requirements contained in  
15 Ordinances and State Laws with which the Project will be required to comply, which Mitigation  
16 Monitoring and Reporting Program is attached hereto as Exhibit “B” and incorporated herein by  
17 reference; and

18 WHEREAS, the City has not received any comments or additional information that  
19 constitutes substantial new information requiring recirculation under Public Resources Code  
20 section 21092.1 and State CEQA Guidelines section 15088.5; and

21 WHEREAS, all requirements of the CEQA Regulations have been satisfied by the City in  
22 the EIR, which is sufficiently detailed so that all of the potentially significant environmental effects  
23 of the Project have been adequately evaluated.

24 NOW, THEREFORE, IT IS RESOLVED by the City Council of the City of Riverside,  
25 California, and making the following findings, as follows:

26 Section 1: The above recitals are hereby found and determined to be true and correct and  
27 are hereby incorporated herein as if stated in full.

28 Section 2: The City Council hereby makes the following findings and conclusions:

- 1 (a) The FEIR for the Project has been completed and processed in compliance with the  
2 requirements of CEQA;
- 3 (b) The FEIR was presented to the City Council, and the City Council, as the decision  
4 making body for the City, reviewed and considered the information contained in  
5 the FEIR and the administrative record as a whole, which includes, but is not  
6 limited to, staff reports, testimony and information received, and scientific and  
7 factual data presented in evidence during the review process, prior to approving the  
8 Project; and
- 9 (c) The FEIR reflects the City's independent judgment and analysis.

10 Section 3: The City Council hereby finds that any changes to the FEIR in response to  
11 comments received on the Draft EIR merely clarify, amplify or make insignificant modifications  
12 to an already adequate EIR pursuant to CEQA Guidelines Section 15088.5(b) and that no  
13 significant new information has been received that would require recirculation.

14 Section 4: The City Council finds that the Findings/SOC set forth in Exhibit "A," attached  
15 hereto and incorporated by reference herein as if stated in full, are supported by substantial  
16 evidence in the administrative record and are hereby adopted by the City Council.

17 Section 5: Potential environmental effects have been studied and, except as stated in  
18 Section 8 below, there is no substantial evidence in the record, as a whole, that supports any  
19 argument that the Project, as designed and mitigated, may cause a significant effect on the  
20 environment. No facts, reasonable assumptions predicated on facts, testimony supported by  
21 adequate factual foundation, or expert opinion supported by facts has been submitted that refute  
22 the conclusions reached by the FEIR, studies, data and reports. Nor does anything in the record  
23 alter the environmental determination, as presented, based upon investigation and independent  
24 assessment of those studies, data and reports. No new significant impacts have been raised by any  
25 commenting individual or entity, nor has any significant new information been added to the FEIR  
26 that would require recirculation under State CEQA Guidelines section 15088.5.

27 Section 6: The FEIR dated December 13, 2018, for the Project reflects the independent  
28 judgment of the City based upon the findings and conclusions stated in the FEIR, staff reports, and

1 in consideration of testimony and information received, and scientific and factual data presented  
2 in evidence during the review process.

3 Section 7: The City Council Finds that the FEIR dated December 13, 2018, has fully  
4 examined the environmental impacts of the Project and, based on the information in the  
5 administrative record, including the analysis in the FEIR, has determined that the impacts on  
6 aesthetics, agricultural and forestry resources, air quality, biological resources, cultural resources,  
7 energy conservation, geology and soils, greenhouse gas emissions, hazards and hazardous  
8 materials, hydrology and water quality, land use and planning, mineral resources, noise and  
9 vibration, population and housing, public services, recreation, transportation and traffic (except as  
10 to local roadways and intersections and regional facilities), tribal cultural resources, and utilities  
11 and service systems either have no impact, are less than significant or are potentially significant  
12 but that with mitigation the impacts are reduced to less than significant based on the Findings/SOC  
13 set forth in Exhibit "A" attached hereto and incorporated herein by reference, as well as the  
14 findings and analysis contained in the FEIR (collectively "Findings"). The Findings are supported  
15 by substantial evidence contained therein as well as in the record, and as such, said Findings are  
16 hereby adopted by the City Council.

17 Section 8: The City Council finds that the FEIR dated December 13, 2018, has fully  
18 examined the environmental concerns associated with the Project and, based on the information in  
19 the administrative record, including the analysis in the FEIR, has determined that the following  
20 significant impacts, identified in the FEIR, cannot be mitigated to a level of insignificant:  
21 transportation and traffic (as to local roadways and intersections and regional facilities). As  
22 explained in attached Exhibit "A" Findings/SOC, the City Council finds pursuant to Public  
23 Resources Code section 21081(a)(3) that specific economic, legal, social, technological or other  
24 considerations make infeasible additional mitigation measures or alternatives that would  
25 substantially lessen such impacts. The City Council further finds, pursuant to Public Resources  
26 Code section 21081(a)(1) and as explained in the Findings/SOC (Exhibit "A") that changes or  
27 alterations have been incorporated into the Project which mitigate or avoid those significant  
28 impacts identified in the FEIR to the fullest extent feasible.

1        Section 9: With the exception of the impacts identified in Section 8 above, the City Council  
2 finds that, the Project, including all mitigation measures, conditions, permits and approvals will  
3 not have any other significant adverse unmitigated impacts on the environment. Potential  
4 environmental effects have been studied and there is no substantial evidence in the record, as a  
5 whole, that supports any argument that the Project, as designed and mitigated, would cause a  
6 significant effect on the environment, except as to the impacts identified in Section 8. No facts,  
7 reasonable assumptions predicated on facts, testimony supported by adequate factual foundation,  
8 or expert opinion supported by facts has been submitted that refute the conclusions reached by the  
9 FEIR, studies, data and reports. Nor does anything in the record alter the environmental  
10 determination, as presented, based upon investigation and independent assessment of those studies,  
11 data and reports

12        Section 10: The City Council finds that alternative project locations were considered and  
13 rejected from further consideration as set forth in attached Exhibit “A” Findings/SOC. The City  
14 Council further finds that two (2) alternatives, including the No Project Alternative, and four (4)  
15 alternatives considered but rejected from further consideration, were identified and analyzed in the  
16 FEIR and all were rejected as failing to meet most of the Project objectives, as introducing  
17 new/worse significant environmental impacts as compared to the Project, and/or as infeasible, due  
18 to specific economic, legal, social technological and other considerations. These grounds are  
19 contained in the administrative record, including the FEIR, attached Exhibit “A” Findings/SOC,  
20 and the written and verbal testimony. Specifically:

- 21        (a)        Alternative – No Project (Implement the 2013 Approved CBUSP). This Alternative  
22                    was rejected because it fails to meet all of the Project objectives, including the most  
23                    important objectives: i) provide sufficient and appropriate academic, research,  
24                    athletic, housing and support facilities to accommodate the CBU’s planned student  
25                    enrollment by 12,000 by year 2025; and ii) provide an enhanced CBU campus  
26                    setting that attracts prospective students and their parents to the City of Riverside,  
27                    and that enhances the stature of CBU as it relates to other universities and facilities.  
28

1 This Alternative is infeasible because development of the CBU campus has nearly  
2 or already reached the existing CBUSP growth limits.

- 3 (b) Alternative 2 – Increased Student Housing Alternative. This Alternative was  
4 rejected and determined not to be feasible because it would only meet five (5) of  
5 the eight (8) Project objectives and while it would reduce impacts to air quality,  
6 greenhouse gas emissions, and traffic/transportation, it would not reduce the  
7 significant and unavoidable impacts of the Project. Further, with the increase in  
8 student housing under this Alternative, further development of building area and  
9 parking structures would be limited, thus not meeting the objective of providing  
10 sufficient and appropriate academic, research, athletic, housing and support  
11 facilities to accommodate the CBU’s planned student enrollment by 12,000 by year  
12 2025.

13 Section 11: The FEIR dated December 13, 2018, for the Project has been completed and  
14 processed in compliance with the requirements of the CEQA Regulations (both state and local),  
15 and based on the entirety of the administrative record is hereby certified.

16 Section 12: The City Council has balanced the benefits of the adoption of the Project  
17 against its unavoidable environmental impacts and has determined that for the reasons set forth  
18 below, the economic, legal, social, technological and other benefits of the Project outweigh the  
19 unavoidable adverse environmental effects which have been identified in attached Exhibit “A”  
20 Findings/SOC and discussed in Section 10 and the adverse environmental effects are therefore  
21 considered acceptable. Some of the benefits of implementing and approving the Project are  
22 summarized as follows:

- 23 (a) Implements the Objectives and land use designations of the General Plan 2025 by  
24 ensuring well-planned infill development along established transportation corridors and improving  
25 or expanding the housing stock to support and compliment the major educational institutions and  
26 rapid bus transit in the Riverside community.



1 (b) Enables students to acquire knowledge, skills, and aspirations by providing  
2 academic programs that prepare students for professional careers that sustain economic  
3 development.

4 (c) Fosters an environment supporting the intellectual, physical, social, and spiritual  
5 development of each student so that they will become productive and good citizens in the  
6 communities they serve.

7 (d) Promotes a unified and recognizable campus identity that sustains an elevated  
8 community aesthetic by providing detailed architecture, signage, and landscaping guidelines.

9 (e) Creates meaningful and gainful employment by providing construction-related  
10 jobs, increased employment of faculty and staff, and developing a workforce to benefit the  
11 economy of Riverside and other communities.

12 (f) Supports existing and future local businesses by providing an increased customer  
13 base for local businesses. The increased customer base will also provide increased sales tax  
14 revenues.

15 (g) Produces performing arts and competitive sports venues that will promote the  
16 image of Riverside and attract visitors which will increase the demand for lodging and dining,  
17 which will increase sales tax revenues.

18 (h) Capitalizes on opportunities for diverse modes of transportation mobility by  
19 concentrating a population where key transportation infrastructure exists and where alternative  
20 forms of transportation can thrive.

21 (i) Preserves and protects cultural resources on the campus that reflect Riverside's  
22 history by establishing historic districts and guidelines for the treatment of each historic resource  
23 on campus.

24 (j) Implements environmentally sustainable practices by achieving higher energy  
25 efficiency and reducing long-term operating expenses through building design; waste diversion  
26 programs to aid the City in meeting legislative requirements; and sustainability measures that  
27 support the City's Green Action Plan.  
28

1 (k) The Project site is located along major transportation corridors with proximate  
2 access to the interstate freeway system and major roadways in an urban setting. Adding density  
3 to the campus acts to reduce vehicle miles traveled and takes advantage of existing infrastructure  
4 systems

5 (l) Serves as a laboratory for technological development by implementing  
6 communication and workplace technologies and partnering with associated organizations to  
7 remain current on technological advancements.

8 These findings are supported by substantial evidence and the data to support these  
9 overriding considerations are found throughout the FEIR, the supporting comments and responses  
10 section of the FEIR, and by information throughout the administrative record.

11 Section 13: Specific environmental, economic, social, legal, technical and other  
12 considerations and benefits derived from the development of the Project override and make  
13 infeasible any alternative to the Project or further mitigation measures beyond those incorporated  
14 into this Project.

15 Section 14: The City Council further finds that the Project will provide numerous  
16 benefits to the City, as stated in Section 12 above, which outweigh its unavoidable environmental  
17 impacts and therefore adopts the Statement of Overriding Considerations set forth more fully  
18 Exhibit “A” attached hereto and incorporated herein by reference.

19 Section 15: The City Council finds that all significant environmental impacts from  
20 implementation of the Project have been identified in the FEIR and, with the implementation of  
21 the mitigation measures set forth in the Mitigation Monitoring and Reporting Program contained  
22 in Exhibit “B” attached hereto and incorporated herein by reference, will be mitigated to a less-  
23 than-significant level, with the exception of the impacts identified in Section 8 above. The City  
24 Council hereby adopts the Mitigation Monitoring and Reporting Program for the Project to  
25 implement the policies, goals and implementation measures identified in the FEIR as necessary to  
26 preclude the need for further mitigation measures. Said Mitigation Monitoring and Reporting  
27 Program, contained in the FEIR and attached hereto as Exhibit “B”, is hereby incorporated as part  
28 of the approval of the City Council for the adoption of the Project.

Section 16: The City Council hereby finds that the locations of documents and other materials which constitute the record of proceedings upon which its decision is based are the Community & Economic Development Department, Planning Division and the City Clerk's Office located at 3900 Main Street, Riverside, California 92522, and the custodian of such records shall be the Community & Economic Development Director and the City Clerk, respectively.

ADOPTED by the City Council this \_\_\_\_\_ day of \_\_\_\_\_, 2019.

WILLIAM R. BAILEY, III  
Mayor of the City of Riverside

Attest:

COLLEEN J. NICOL  
City Clerk of the City of Riverside

I, Colleen J. Nicol, City Clerk of the City of Riverside, California, hereby certify that the foregoing resolution was duly and regularly introduced at a meeting of the City Council on the \_\_\_\_ day of \_\_\_\_\_, 2019, by the following vote, to wit:

Ayes:

Noes:

Abstain:

Absent:

IN WITNESS WHEREOF I have hereunto set my hand and affixed the official seal of  
the City of Riverside, California, this \_\_\_\_ day of \_\_\_\_\_, 2019.

COLLEEN J. NICOL  
City Clerk of the City of Riverside

18-1701; 12/17/18

**Exhibit “A”**

**CEQA Findings of Fact and Statement of Overriding  
Considerations for the California Baptist University Specific Plan  
Amendment Project**

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## **Exhibit “A”**

# **CEQA Findings of Fact and Statement of Overriding Considerations for the California Baptist University Specific Plan Amendment Project**

## **1.0 PROJECT BACKGROUND**

The California Baptist University Specific Plan Amendment Project (hereinafter referred to as the “Project”) was proposed in the City of Riverside (“City”) by California Baptist University to create a framework to guide development of campus boundary and facility expansions in order to facilitate the projected student enrollment in 2025 and provide a revised approach to regulate land use and development within the proposed California Baptist University Specific Plan (CBUSP) Planning Area to facilitate a transition from the current suburban model to a more urbanstyle campus. (DEIR, p. 2-22.) The 167-acre Project site is generally located at 8432 Magnolia Avenue in the City of Riverside, California and consists of the approximately 156.4-acre current CBUSP Planning Area and approximately 10.6 acres encompassing two properties on the west side of Monroe Street owned and operated by California Baptist University. (DEIR, p. 2-1.) As amended, the CBUSP would enable the University to accommodate a student enrollment goal of 12,000 students in 2025 by guiding the development of an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structures. (DEIR, pp. 2-1, 2-26.)

Implementation of the proposed Project would require the approval of the following land use cases by the City of Riverside City Council:

1. General Plan Amendment (P15-0989) to change the underlying General Plan land use designation of two properties located at 3532 Monroe Street (Health Sciences Campus) and 3626 Monroe Street (Wellness Center) from “PF - Public Facilities/Institutional” to “CBUSP - CBU Specific Plan”.
2. Specific Plan Amendment (P17-0543) to remove the two properties located at 3532 Monroe Street (Health Sciences Campus) and 3626 Monroe Street (Wellness Center) from the *Magnolia Avenue Specific Plan* and to add these properties to the CBUSP.
3. Change of Zone (P15-0987) to change the zoning on the CBUSP Planning Area to “CBUSP - California Baptist University Specific Plan Zone”. Rezone portions of the project area from CBUSP-MU/A-CR – CBUSP - Mixed Use/Academic Planning Area and Cultural Resources Overlay Zones and CBUSP-MU/R-CR – CBUSP - Mixed Use/Residential Planning Area and Cultural Resources Overlay Zones to “CBUSP-CR – California Baptist University Specific Plan and Cultural Resources Overlay Zones”. Change of zone on the two properties located at 3532 Monroe Street (Health Sciences Campus) and 3626 Monroe Street (Wellness Center) from R-1-7000 to “CBUSP – California Baptist University Specific Plan Zone”.



Pursuant to the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq.) (“CEQA”), specifically Public Resources Code section 21067, and the State CEQA Guidelines (Cal. Code Regs., § 15000 et seq.), specifically State CEQA Guidelines section 15367; the City is the lead agency for the Project. Pursuant to CEQA and the State CEQA Guidelines, the City determined that an EIR should be prepared in order to analyze all potential adverse environmental impacts of the Project and reasonable alternatives to the Project.

The City issued the Notice of Preparation (“NOP”) of a Draft EIR for the Project on April 28, 2016 and received by the State Clearinghouse on May 2, 2016 and circulated the NOP for a 30-day public review period, ending May 31, 2016. In the NOP, the City solicited comments from various public agencies, other entities, and members of the public.

The City then prepared a Draft Environmental Impact Report (“DEIR”) and on September 21, 2018 initiated a 45-day public review and comment period on the DEIR (September 21, 2018 through November 5, 2018), and released the DEIR to the public.

The DEIR considered two alternative project scenarios:

- Alternative 1, No Project - Continued Implementation of the Existing 2013 CBU Specific Plan: describes the circumstance under which the proposed Project does not proceed and the site would continue to be developed and utilized in accordance with the existing 2013 CBU Specific Plan; and
- Alternative 2, Increased Student Housing Alternative: describes meeting the projected student housing demand for 1,100 additional student beds on the University campus, over and above the construction of 400,000 square feet of additional building area, 805,000 square feet of parking structures, and improved athletic stadiums.

The Draft EIR was available for review at the City of Riverside Planning Division, located at 3900 Main Street, Riverside, California 92522, as well as the Downtown Main Library and the Arlington Branch Library, in addition to being posted on the City’s website at <http://www.riversideca.gov/planning/eir.asp>.

During the public review and comment period, the City received 1 comment letter.

Following the close of public review and comment, the City prepared a Final EIR (“FEIR”), consisting of the comments received, written responses to those comments, and revisions to the DEIR.

On January 8, 2019, the City Council held a public hearing to consider the FEIR associated with the Project.

## **2.0 INCORPORATED DOCUMENTS/RECORDS OF PROCEEDINGS**

The following information is incorporated by reference and made part of the record supporting these findings:

- All Project plans and materials including supportive technical reports for the Project;
- The Draft EIR and appendices and Final EIR and all documents relied upon or incorporated by reference;
- All documents and materials making up the City Planning Commission staff report for this project heard on November 29, 2018.
- The mitigation monitoring and reporting program prepared for the Project;
- City of Riverside General Plan 2025;
- Final Environmental Impact Report (FEIR) for the City of Riverside General Plan 2025 (State Clearinghouse Number 2004021108; certified by the City in November 2007) (General Plan 2025 Final EIR);
- Findings and Statement of Overriding Considerations (SOCs) for the General Plan 2025 Final EIR;
- Addendum to the General Plan 2025 FEIR;
- Second Addendum to the General Plan 2025 FEIR;
- Third Addendum to the General Plan 2025 FEIR;
- Fourth Addendum to the General Plan 2025 FEIR;
- Fifth Addendum to the General Plan 2025 FEIR;
- Title 19 of the Riverside Municipal Code;
- Title 18 of the Riverside Municipal Code;
- Title 20 of the Riverside Municipal Code;
- All records of decision, resolutions, staff reports, memoranda, maps, exhibits letter, synopses of meetings, summaries, and other documents approved, reviewed, relied upon, or prepared by any City commissions, boards, officials, consultants, or staff relating to the Project;
- Any documents expressly cited in the these findings, in addition to those cited above; and

- Any other materials required for the record of proceedings by Public Resources Code section 21167.6, subdivision (c).

Pursuant to CEQA Guidelines Section 15091(e) the documents and other materials that constitute the record of proceedings upon which the City has based its decision are located in and may be obtained from the Planning Division of the Community & Economic Development Department. The City Clerk is the custodian of records for all matters before the City Council.

### **3.0 INDEPENDENT JUDGMENT FINDING**

The City selected and retained LSA Associates, In. (LSA) to prepare the EIR. LSA prepared the EIR under the supervision and direction of the City's planning staff.

Finding: The EIR for the Project reflects the City's independent judgment. The City has exercised independent judgment in accordance with Public Resources Code Section 21082.1(c)(3) in retaining its own environmental consultant, directing the consultant in the preparation of the EIR, as well as reviewing, analyzing and revising material prepared by the consultant.

### **4.0 ENVIRONMENTAL IMPACT FINDINGS**

The following findings of fact are based on information contained within the DEIR and FEIR, which have been deemed adequate and consistent with CEQA, and include information received during the public review process. This section provides a summary of the significant environmental effects of the Project that are discussed in the EIR, and provides written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding.

City staff reports, the EIR, written and oral testimony at public meetings or hearings, these facts and findings and other information in the administrative record, serve as the basis for the City's environmental determination. These findings are supported by substantial evidence in the record of proceedings before the City as summarized below. Further explanation of these environmental findings and conclusions can be found in the DEIR and FEIR and these findings hereby incorporate by reference the discussion and analysis in those documents supporting the FEIR's determinations regarding mitigation measures and the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the City ratifies, adopts and incorporates in these findings the determinations and conclusions of the Draft EIR and FEIR relating to environmental impacts and mitigation measures except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

These findings are for the Project as defined in the DEIR. As evaluated in the DEIR, the California Baptist University Specific Plan Amendment Project proposes to create a framework to guide development of the California Baptist University campus boundary and facility expansions in order to facilitate the projected student enrollment in 2025 and provide a revised approach to regulate land use and development within the proposed CBUSP Planning Area. As amended, the CBUSP would enable the University to accommodate a student enrollment goal of 12,000 students in 2025 by guiding the development of an additional 400,000 square feet of building area for

academic, recreational, and student housing purposes and 805,000 square feet of parking structures. Alternatives 1 and 2 are considered alternatives that were considered in the DEIR and FEIR, and rejected by the City Council as set forth in Section 5.0, below, of these Findings.

On January 8, 2019, the City Council determined that, based on all of the evidence presented, including but not limited to the DEIR and FEIR (together, “the EIR”), written and oral testimony given at hearings and meetings, and submission of testimony from the public, organizations, and public agencies, the following environmental impacts of the Project are: (1) less than significant and do not require mitigation; (2) potentially significant but will be avoided or reduced to a level of insignificance through the identified Mitigation Measures; or (3) significant and unavoidable and cannot be mitigated to a level of less than significant.

## **4.1 Findings Regarding Less Than Significant Impacts Not Requiring Mitigation**

Consistent with Public Resources Code section 21001.2 and section 15128 of the State CEQA Guidelines, the EIR focused its analysis on potentially significant impacts and limited discussion of other impacts for which it can be seen with certainty there is no potential for significant adverse environmental effects. State CEQA Guidelines section 15091 does not require specific findings to address environmental effects that an EIR identifies as “no impact” or as a “less than significant impact.” Nevertheless, the City Council hereby finds that the Project would have either no impact or a less than significant impact to the following resource areas:

### **A. AESTHETICS**

#### **1. Scenic Resources**

**Threshold A:** Would the project have a substantial adverse effect on a scenic vista?

**Finding:** Less than significant impact. (DEIR, pp. 4.1-14 – 4.1-15.)

**Explanation:** The CBU Specific Plan Zone is within an urbanized area completely surrounded by existing development. According to the *City of Riverside General Plan 2025 Final Program Environmental Impact Report*, hills and ridgelines such as La Sierra/Norco Hills (4 miles west of CBU), Sycamore Canyon Wilderness Park (5 miles east of CBU), Box Springs Mountain (7 miles east-northeast of CBU), Mt. Rubidoux (3.5 miles north-northeast of CBU), Arlington Mountain (1.5 miles west of CBU), and the hills of Alessandro Heights (2.7 miles east-southeast of CBU) comprise scenic vistas for residents of the City. Areas of the CBU Specific Plan Zone, for example, along Adams Street, Monroe Street, Diana Avenue, the athletic fields, and Magnolia Lawn, from which the City’s surrounding hills and ridgelines could be seen, contain visual obstructions such as landscaping, street trees and signs, and existing buildings, substantially limiting views of these scenic vistas. Due to the topography, landscaping, and surrounding buildings, these scenic vistas cannot be seen from the majority of the CBU Specific Plan Zone or immediate vicinity.

The CBUSP Amendment identifies viewshed opportunities from the CBU Specific Plan Zone. In particular, Magnolia Avenue is designated a Scenic Boulevard, Parkway, and Special Boulevard, and development within the viewshed of Magnolia Avenue has the potential to impact its aesthetic appeal to the community. Accordingly, the CBUSP Amendment includes several objectives and policies, as outlined in Section 4.1.42, which require all CBU-administered development to protect and improve the aesthetic qualities of Magnolia Avenue in accordance with the *General Plan 2025* and the CBUSP Amendment.

Additionally, the CBU Specific Plan Zone includes two subareas (CBUSP-1 and CBUSP-2) to regulate building height, density, and setbacks. Different height and density standards as detailed in Chapter 4: Land Use Regulations and Development Standards of the CBUSP Amendment will be established in recognition of the CBUSP-1 original campus core and the CBUSP-2 adjacent properties. These standards are proposed to ensure appropriate transitions between CBU properties and surrounding non-CBU land uses.

Generally, taller buildings and structures will be placed at the center of the core campus area. Buildings will step down in height toward the campus edges and in particular, buildings along the edges will be of a scale and mass that are compatible with buildings on adjacent non-University properties. These design features would ensure implementation of the CBUSP Amendment would not exacerbate the existing visual obstructions to scenic vistas.

All future projects and construction facilitated by the proposed CBUSP Amendment will be required to undergo Planning Staff review and approval to ensure design elements are proposed and implemented in accordance with the objectives and policies of the of the CBUSP Amendment and the *General Plan 2025* prior to permit issuance. Minimum distances between buildings shall occur pursuant to the Table 4-2 of the CBUSP Amendment. Consideration for additional height increases may be permitted for architectural elements, including but not limited to cupolas, domes, or roof enhancements pursuant to Chapter 19.560 of the Zoning Code for exceptions to height limits. Through this process, the setbacks may be reduced to reflect specific circumstances, such as potential obstruction of scenic vistas. Therefore, the Project will have a less than significant impact to scenic vistas. No mitigation is required. (DEIR, p 4.1-15.)

**Threshold B:** Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?

**Finding:** Less than significant impact. (DEIR, pp. 4.1-15 – 4.1-16.)

**Explanation:** The *General Plan 2025* and *Magnolia Avenue Specific Plan* designates Magnolia Avenue as a Scenic Boulevard, Parkway, and Special Boulevard. Furthermore, the *Magnolia Avenue Specific Plan* defines the area of Magnolia Avenue within and in the vicinity of the CBU Specific Plan Zone as the *Magnolia Heritage District* comprised of several historic properties significant at the national, State, and/or local level. Minimum setback requirements along Magnolia Avenue would be 20 feet and include green space and informal recreation features to provide a transition between the campus and surrounding areas. The street frontage along the south side of Magnolia Avenue would consist of a combination public realm/private realm landscaped and pedestrian area consisting of a minimum 26-foot public landscaped parkway containing a five-foot sidewalk, plus a 20-foot landscaped setback (measured from the property line) on University

land. No buildings, opaque fences, or walls (other than monumentation walls) would be placed within the 20-foot landscaped area on campus property. The street frontage on the north side of Magnolia Avenue would consist of a combination public realm/private realm landscaped and pedestrian area. The public realm would consist of a minimum 26-foot landscaped parkway containing a five-foot sidewalk framed by a buffering parkway and approximate nine-foot landscape area within the public right-of-way. A 20-foot landscaped setback would be provided on private properties. Existing buildings may remain within the landscaped setback area.

Setback encroachment will not be permitted along Magnolia Avenue except as authorized by the City's Community and Economic Development Director through a Substantial Conformance Determination process. In approving a Substantial Conformance, the Director is required to demonstrate that the proposed modification would meet the overall purpose and intent of the Specific Plan and the proposed modification would not compromise the Specific Plan objectives and policies, as amended.

The CBU Specific Plan Zone is developed with the existing campus academic/administrative, residential, and athletic facilities and is surrounded by urban development. Implementation of the proposed CBUSP Amendment is designed to establish a framework for a more urban-style development schema within the CBU Specific Plan Zone while maintaining the aesthetic and historical nature of the *Magnolia Heritage District*; it does not involve construction of new buildings or a specific project which may impact the aesthetic qualities of Magnolia Avenue or the *Magnolia Heritage District*.

Future development will be required to adhere to the land use regulations and development standards (Chapter 4) and design guidelines (Chapter 7) outlined in the CBUSP Amendment, which will ensure that height, scale, and design elements will be aesthetically pleasing and complementary to existing development, the Magnolia Avenue corridor, and the *Magnolia Heritage District*. Although Magnolia Avenue is designated by the City as a Scenic Boulevard, Parkway, and Special Boulevard, there are no state scenic highways near the Project site as identified by the California Scenic Highway Program.<sup>1</sup> Therefore, the Project will have a less than significant impact to scenic resources within a State scenic highway. No mitigation is required. (DEIR, p. 4.1-16.)

## **2. Visual Character**

**Threshold C:** Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

**Finding:** Less than significant impact. (DEIR, pp. 4.1-17 – 4.1-18.)

**Explanation:** Implementation of the proposed CBUSP Amendment will improve the aesthetic qualities of the CBU and surrounding community. The proposed Project would comply with the Land Use Regulations and Development Standards (Chapter 4) and Design Guidelines (Chapter 7) of the CBUSP that meet the objectives and policies of the *General Plan 2025* and will supplant

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<sup>1</sup> *California Scenic Highway Mapping System*, California Department of Transportation. Updated September 7, 2011. [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm) (Accessed August 8, 2017).

the *Magnolia Avenue Specific Plan* and *2013 CBUSP*. Development within the CBU Specific Plan Zone will improve upon the existing visual character of the Project site while maintaining consistency with the existing visual character of the surrounding community. CBU is a major contributor to the existing visual character and historic fabric of Magnolia Avenue, as the Campus boasts several facilities dating to the late 19th and early 20th Centuries that contribute to the historic nature of the *Magnolia Heritage District*. Accordingly, the proposed CBUSP Amendment includes several policies designed to maintain the aesthetic and historical nature of the *Magnolia Heritage District* while facilitating the anticipated future development of the CBU campus.

- Policy 2.1 requires edge and transition standards that respect the scale and character of the campus community interface in accordance with the CBUSP Amendment development standards and the *Citywide Design Guidelines and Sign Guidelines*.
- Policy 2.3 requires the Magnolia Avenue Corridor to be designed as a pedestrian-oriented, mixed-use boulevard along the campus frontage.
- Policy 5.1 pursues adaptive reuse of designated historical structures.
- Policy 5.2 provides for new buildings to be architecturally compatible with the existing historical campus architecture.
- Policy 5.3 protects historical landscapes and other non-structural features.
- Policy 5.4 designates a CBU Historical District, per Title 20 of the Riverside Municipal Code that encompasses buildings and other features that reflect the City's rich history.

Implementation of the proposed CBUSP Amendment will add to the cohesion of the existing area, including the *Magnolia Heritage District* of the Magnolia Avenue corridor, by protecting and enhancing the visual and historic qualities of CBU and the surrounding community.

Preserving existing views into the CBU campus and enhancing the street edges further the vision of the CBUSP Amendment for a high-quality university. The visual aesthetic of CBU proudly reflects its educational mission. Thus, CBU's intent is to enhance campus views as the campus expands. Public view opportunities are identified at the intersections of Magnolia Avenue and Monroe Street, Magnolia Avenue and Campus Bridge Drive, Magnolia Avenue and Adams Street, and Adams Street and Briarwood Drive. Key landscaping and architectural features at these locations will include dense, attractive landscaping, uniform high-quality fencing materials, strong architectural design, a comprehensive sign program, and attractive campus gateways.

Future development will be required to adhere to the land use regulations and development standards (Chapter 4) and design guidelines (Chapter 7) outlined in the CBUSP Amendment which will ensure that height, scale, and design elements will be aesthetically pleasing and complementary to existing development, the Magnolia Avenue corridor, and the Magnolia Heritage District. These guidelines are intended to ensure design consistency throughout the CBU Specific Plan Zone for an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model. However, the Specific Plan retains a degree of flexibility to accommodate various development types within

the CBU Specific Plan Zone and facilitate a compatible transition between the CBU Specific Plan Zone and adjacent properties that would be subject to the Citywide Design Guidelines and Sign Guidelines and the design guidelines of the Magnolia Avenue Specific Plan.

All future development administered by CBU will be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the objectives and policies of the of the CBUSP Amendment and the General Plan 2025 prior to permit issuance. Therefore, the Project will have a less than significant impact on the existing visual character or quality of the site and its surroundings. No mitigation is required. (DEIR, pp. 4.1-17 – 4.1-18.)

**Threshold D:** Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

**Finding:** Less than significant impact. (DEIR, pp. 4.1-18 – 4.1-20.)

**Explanation:** The CBU Specific Plan Zone is not located within the Mount Palomar Lighting Area and is already developed with existing buildings and athletic facilities which emit light and glare during daytime and nighttime hours. All outdoor lighting currently existing and/or resulting from implementation of the proposed CBUSP Amendment will be designed and operated in accordance with the CBUSP Amendment lighting design elements, as well as the Riverside Municipal Code Chapter 19.556 (*Lighting*) and Chapter 19.590.070 (*Light and Glare*) where applicable. Additionally, all surface parking lot lighting shall comply with the standards set forth in Riverside Municipal Code Chapter 19.580 (*Parking and Loading*), Section 19.580.080 (*Design Standards*).

Land use regulations and development standards (Chapter 4) and design guidelines (Chapter 7) outlined in the CBUSP Amendment will ensure light sources will not result in significant glare or adversely affect day or nighttime views in the area. General lighting guidelines in the CBUSP Amendment recommend concealed light sources to minimize glare. Additionally, outdoor lighting must be focused, directed, and arranged to prevent glare and illumination on public streets and any adjacent properties not owned by CBU. As necessary for each increment of development resulting from implementation of the CBUSP Amendment, photometric light studies will be submitted by CBU and approved by Planning staff to ensure no light spillage onto public right-of-way or adjacent properties. High intensity lights are discouraged, except for use on athletic fields and student recreation facilities.

Athletic open space will provide for athletic fields appropriate to the competitive division of college athletics with which CBU is affiliated. Various upgrades to athletic facilities will be required to accommodate an increase in the number of spectators at sporting events, as well as satisfy NCAA Division I standards. The lighting and use of athletic fields are subject to the following design elements, as well as the Riverside Municipal Code Chapter 19.556 (*Lighting*) and Chapter 19.590.070 (*Light and Glare*) where applicable.

- Installation and use of athletic field lighting shall be restricted to formal athletic facilities used for NCAA competition.
- Athletic field light standards shall be a maximum height of 99 feet. However, through the Administrative Minor Modification process, higher standards may be permitted as required



for specific needs, subject to review by the Riverside County Airport Land Use Commission for compliance with the Riverside County Airport Land Use Compatibility Plan.

- All athletic field lighting shall be designed oriented to avoid spillover glare and illumination of any adjacent properties not within the Specific Plan area. This may require the use of cut-off shields or other approaches.

According to Riverside Municipal Code Chapter 19.590.070(B) (*Light and Glare*), stadium and playing field lighting height is not restricted to the maximum permitted building height of the zone where such lights are located. Therefore, athletic field lighting within the CBU Specific Plan Zone will be subject to height standards administered by the Land Use Compatibility Plan prepared for Riverside Municipal Airport (ALUCP).

The CBU Specific Plan Zone is located approximately two miles south of the Riverside Municipal Airport. Portions of the CBU Specific Plan Zone lie within Compatibility Zone D (*Primary Traffic Patterns and Runway Buffer Area*) and Compatibility Zone E (*Other Airport Environs*) of the ALUCP as shown on Figure 4.8-1. In Zone D, any development over 70 feet tall will be subject to airspace review by the Riverside County Airport Land Use Commission (RCALUC). In Zone E, any development over 100 feet tall will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.

All future development administered by the CBU would be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the CBUSP Amendment, the *General Plan 2025*, and Riverside Municipal Code Chapter 19.556 (Lighting) and Chapter 19.590.070 (*Light and Glare*). Additionally, since the CBU Specific Plan Zone is within Compatibility Zone D (*Primary Traffic Patterns and Runway Buffer Area*) and Compatibility Zone E (*Other Airport Environs*) of the ALUCP, the Riverside County Airport Land Use Commission would review the proposed CBUSP Amendment for compliance with the Riverside County Airport Land Use Compatibility Plan pursuant to California Public Utilities Code Section 21676. Project-specific conditions imposed by the ALUCP will be implemented as applicable so that all future development facilitated under the CBUSP Amendment within Compatibility Zone D and Compatibility Zone E will occur in accordance with the ALUCP. Through compliance with design elements outlined in Chapter 7 of the CBUSP Amendment the *General Plan 2025*, Riverside Municipal Code Chapter 19.556 (*Lighting*) and Chapter 19.590.070 (*Light and Glare*), and the ALUCP, the Project will have a **less than significant impact** to light and glare. No mitigation is required. (DEIR, p. 4.1-20.)

## **B. AGRICULTURAL AND FORESTRY RESOURCES**

### **1. Farmland Conversion**

**Threshold A:** Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No Impact. (DEIR, pp. 4.2-6 - 4.2-7.)

Explanation: The Project site is developed with CBU-related facilities comprised of academic buildings, student housing, athletic facilities, arts and culture venues, parking lots, and an open space network of lawns, athletic fields, plazas, courtyards, and water quality basins within an urbanized area. Additionally, non-CBU-related commercial uses operated under license or lease arrangement with CBU are located within the Project site. The proposed Project includes rezone of the site from CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000-SP – Single-Family Residential Zone and Specific Plan (Magnolia Avenue) Overlay Zones to CBUSP - California Baptist University Specific Plan Zone. The Project site is designated “Urban and Built-Up Land” by the California DOC FMMP and as depicted in Figure OS-2, Agricultural Suitability, in the City’s General Plan 2025. Since the site is already developed with university-related facilities and is not located on any Farmland designations, no conversion of Farmland to non-agricultural use would occur. Therefore, the Project will have no impact to Farmland. No mitigation is required. (DEIR pp. 4.2-6 - 4.2-7.)

**Threshold E:** Would the project 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?

Finding: No impact. (DEIR, pp. 4.2-8 - 4.2-9.)

Explanation: The site is generally surrounded by urban and built-up land, and “other land.” Further, implementation of the proposed Project will not involve other changes in the existing environment that could result in the conversion of Farmland to non-agricultural use or forest land to a non-forest use. The Project site is developed with CBU-related facilities comprised of academic buildings, student housing, athletic facilities, arts and culture venues, parking lots, and an open space network of lawns, athletic fields, plazas, courtyards, and water quality basins within an urbanized area. Additionally, non-CBU-related commercial uses operated under license or lease arrangement with CBU are located within the Project site. The Project site is currently zoned CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000-SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones. The Project site is designated “Urban and Built-Up Land” by the California DOC FMMP and as depicted in Figure OS-2, Agricultural Suitability, in the City’s *General Plan 2025*. Since the site is already developed with university related facilities and is not located on any Farmland designations, no conversion of Farmland to non-agricultural use would occur. The Project site contains no forest land or timberland. Therefore, no impacts related to the conversion of Farmland to non-agricultural use or to the loss of forest land and/or timberland will occur with implementation of the proposed Project. No mitigation is required. (DEIR, pp. 4.2-8-9.)

## **2. Agricultural Zoning**

**Threshold B:** Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

**Finding:** No impact. (DEIR, p. 4.2-7.)

**Explanation:** There are no existing agricultural uses on or in the vicinity of the Project site. The Project site is currently zoned CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000-SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones, and is not zoned for agricultural use. According to the DOC’s Williamson Act map and Figure OS-3, Williamson Act Preserves, in the City’s General Plan 2025, there are no Williamson Act contracts on the Project site. Therefore, the Project will have no impact to agricultural zoning or Williamson Act contract lands. No mitigation is required. (DEIR, p. 4.2-7.)

## **3. Forestland Zoning and Loss of Forest Land**

**Threshold C:** Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

**Finding:** No impact. (DEIR, pp. 4.2-7 - 4.2-8.)

**Explanation:** The Project site is currently zoned CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000-SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones. No forest land, timberland, or Timberland Production areas (as defined in the PRC 12220(g) and PRC 4526 or Government Code 51104(g)) are located within or adjacent to the Project site. Therefore, no impact to forest land or timberland will occur from this Project. No mitigation is required. (DEIR, pp. 4.2-7 - 4.2-8.)

**Threshold D:** Would the project result in the loss of forest land or conversion of forest land to non-forest use?

**Finding:** No impact. (DEIR, pp. 4.2-8.)

**Explanation** The Project site contains no forest land; it is developed with CBU-related facilities comprised of academic buildings, student housing, athletic facilities, arts and culture venues, parking lots, and an open space network of lawns, athletic fields, plazas, courtyards, and water quality basins within an urbanized area. Additionally, non-CBU-related commercial uses operated under license or lease arrangement with CBU are located within the Project site. Therefore, no impact to forest land will occur from this Project. No mitigation is required. (DEIR, pp. 4.2-8.)

## C. AIR QUALITY

### 1. Applicable Air Quality Plans

**Threshold A:** Would the project conflict with or obstruct implementation of the applicable air quality plan?

**Finding:** Less than significant impact. (DEIR, pp. 4.3-17 – 4.3-18.)

**Explanation:** Projects are considered consistent with the South Coast Air Quality Management Plan (AQMP) if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP. The future emissions forecasts are primarily based on demographic and economic growth projections provided by SCAG. Thus, demographic growth forecasts for various socioeconomic categories developed by SCAG for their 2016 RTP/SCS were used to estimate future emissions in the Final 2016 AQMP.

Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD CEQA Air Quality Handbook, consistency with the Basin 2016 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. Although the Project would generate short-term and long-term pollutant emissions, all emissions are less than the CEQA significance emissions thresholds established by SCAQMD. 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.

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 district, water ports, solid waste disposal sites, and offshore drilling facilities. The proposed Project is not defined as a significant project. Because the Project's short-term and long-term pollutant emissions are lower than the CEQA significance threshold established by SCAQMD, and the proposed growth associated with CBU is anticipated in the SCAG growth forecasts. In the unlikely event all new students resulting from the proposed Project originate from outside the City, the forecast enrollment could increase the City's population by 3,578 persons (a 1.0 percent over 2017 estimates). For these reasons, the proposed Project is considered to be consistent with the AQMP resulting in a less than significant impact related to conflicts or obstruction of the applicable air quality plan. No mitigation is required. (DEIR, p. 4.3-18.)

### 2. Cumulatively Considerable Increase of Criteria Pollutants

**Threshold C:** Would the project 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).

**Finding:** Less than significant impact. (DEIR, pp. 4.3-24 – 4.3-25.)

Explanation: A project would be considered to have a significant cumulative impact if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact). If a project's emissions would exceed the SCAQMD significance thresholds, it would be considered to have a cumulatively considerable contribution to nonattainment status in the Basin. If a project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality. In this case, the basis for analyzing the Project's cumulative considerable contribution is its consistency with the AQMP as discussed previously under C. Air Quality, Threshold A.

The Basin has been designated as Federal nonattainment area for O<sub>3</sub> and PM<sub>2.5</sub> and a State nonattainment area for O<sub>3</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. PM<sub>10</sub> and PM<sub>2.5</sub> emissions associated with construction generally result in near-field impacts. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the Basin.

Air pollutant emissions associated with construction activity of future projects would be reduced through implementation of control measures required by the SCAQMD. Cumulative PM<sub>10</sub> and PM<sub>2.5</sub> emissions would be reduced because all future projects would be subject to SCAQMD Rule 403 (Fugitive Dust), which sets forth general and specific requirements for all construction sites in the SCAQMD. The maximum daily PM<sub>10</sub> and PM<sub>2.5</sub> concentrations would not exceed thresholds during Project construction activities, although fugitive dust and vehicle and equipment exhaust generated during Project construction would contribute to the Basin nonattainment designation for PM<sub>2.5</sub>; however, this contribution would be considered cumulatively less than significant. No mitigation is required.

As discussed above, the Project would not emit any criteria air pollutants above regional significance thresholds. The Project has also been determined to be consistent with the AQMP, since it is consistent with the underlying land use as determined by the CBUSP. Because the cumulative projects considered in the EIR prepared for the Project are not adjacent to the CBU Campus, it is not anticipated that other projects would be constructed and in operation in the vicinity of the Project whose emissions would comingle with the proposed Project. For this reason, the proposed Project would not result in a cumulatively considerable impact associated with regional emissions. Therefore, the Project would not have a cumulatively considerable contribution to nonattainment status in the Basin. Operational impacts are cumulatively less than significant. No mitigation is required. (DEIR, p. 4.3-25.)

### **3. Sensitive Receptors**

**Threshold D:** Would the project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant impact. (DEIR, pp. 4.3-25 – 4.3-29.)

Explanation: The nearest sensitive receptors to the Project site are existing on-campus student housing, as well as existing single-family and multi-family residences located adjacent to the properties on the Project site, some of which are between 10 and 25 feet from select CBU properties. Additional receptors include a church (Seventh Day Adventist), middle school

(Chemawa Middle School), and high school (Sherman Indian High School) to the west on Magnolia Avenue.

Even if the total daily acreage disturbed is equal to or greater than five acres per day, the SCAQMD's screening look-up tables can be utilized to determine if a project has the potential to result in a significant construction impact. The screening-level analysis is considered more conservative than dispersion modeling, because the look up tables show results for various emissions applied to the size of a project in question. The smaller the project size, the closer the project boundary would be to a potential sensitive receptor and the quantity of emissions that would result in a potential LST impact would be correspondingly lower. The screening analysis used SCAQMD look-up tables to correlate pollutant emissions rates with the lower project size to conservatively determine if the Project is likely to result in a locally significant concentration of any criteria pollutant. Since no more than 4 acres would be disturbed on any one day, the 2 and 5 acre thresholds have been interpolated to derive 4 acre LST thresholds for construction emissions.

The nearest sensitive receptors to the Project site are existing on-campus student housing and academic facilities on the Project site itself, as well as existing single-family and multi-family residences located adjacent to the properties within the CBUSP Planning Area (i.e., CBUSP-1 and CBUSP-2 subareas), some of which are between 10 and 25 feet from select CBU properties. SCAQMD LST Methodology (SCAQMD 2003) specifies "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters."

All criteria pollutants from the Project were estimated to be below localized significance thresholds for construction and operations with implementation of **MM-AQ-1** through **MM-AQ-10**. LSTs were established in order to protect the health of sensitive receptors. As the Project will generate emissions below LST criteria, it would not have a significant impact to human health. Therefore, with implementation of mitigation, the Project would not contribute to significant localized emissions of criteria air pollutants during both construction and operations. Localized ambient air quality impacts are less than significant with mitigation.

An assessment of Project-related impacts on localized ambient air quality requires that future ambient carbon monoxide (CO) air quality levels be projected. Existing CO concentrations in the immediate Project vicinity are not available. Ambient CO levels monitored at the Riverside-Rubidoux Station showed a highest recorded 1 hour concentration of 4.1 ppm (the State standard is 20 ppm) and a highest 8 hour concentration of 1.9 ppm (the State standard is 9 ppm) during the past 3 years. The highest CO concentrations would normally occur during peak traffic hours; hence, CO impacts calculated under peak traffic conditions represent a worst-case analysis.

With addition of the Project in the existing condition with recommended improvements, all study area intersections would operate at satisfactory LOS with the exception of LOS F at the Adams Street/SR-91 Eastbound ramps. An independent CO hot spot analysis was conducted at four intersections in Los Angeles County that are much busier than any in the Project vicinity at the peak morning and afternoon periods and none were predicted to violate any CO standards.

Therefore, the Project can be implemented with no significant CO hot spot impacts created by peak-hour intersection congestion. Given the extremely low level of CO concentrations in the Project area, and no substantial Project-traffic related impacts at any intersections, project-related

vehicle emissions are not expected to result in the CO concentrations exceeding the State or federal CO standards. Impacts associated with CO concentrations are considered less than significant. No mitigation is required. (DEIR, p. 4.3-29.)

#### 4. Odors

**Threshold E:** Would the project create objectionable odors affecting a substantial number of people?

**Finding:** Less than significant impact. (DEIR, p. 4.3-29.)

**Explanation:** Heavy-duty equipment used during construction would emit odors, primarily from the equipment exhaust. However, the construction activity would cease to occur after individual construction is completed. No other sources of objectionable odors have been identified for the CBUSP, and no mitigation measures would be required.

SCAQMD Rule 402 regarding nuisances states: “A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.” The proposed CBUSP does not include any sources that are anticipated to emit any objectionable odors. Therefore, objectionable odors posing a health risk to potential on-site and existing off-site uses would not occur as a result of the CBUSP. A less than significant impact related to creating objectionable odors would occur. No mitigation is required. (DEIR, p. 4.3-29.)

### D. BIOLOGICAL RESOURCES

#### 1. Riparian Habitat or Sensitive Natural Communities

**Threshold B:** Would the Project 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 Wildlife or US Fish and Wildlife Service?

**Finding:** Less than significant impact. (DEIR, pp. 4.4-14 – 4.4-15.)

**Explanation:** The Project site has been previously graded, is fully developed with university and associated facilities, and is completely surrounded by urban development. No riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the USFWS occurs on the Project site.

The Project site is within the Cities of Riverside and Norco Area Plan of the MSHCP. The Project site is not within or adjacent to an MSHCP Criteria Cell, Public/Quasi Public lands, NEPSSA, CASSA, or additional species survey areas. A constructed storm water detention basin is located between Lot 1 and Magnolia Avenue and has the potential to support riparian/riverine resources; however, pursuant to Volume 1, Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, the detention basin is exempt from the MSHCP’s definition of a Riparian/Riverine Area.

The MSHCP definition of Riparian/Riverine Areas given in Volume 1, Section 6.1.2. of the MSHCP is as follows: “lands which contains Habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or an area with fresh water flow during all or a portion of the year.”<sup>2</sup> However, the MSHCP goes on to state, “With the exception of wetlands created for the purpose of providing wetlands Habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, areas demonstrating characteristics as described above which are artificially created are not included in these definitions. Since the detention basin is constructed for the purposes of storm water capture, retention, infiltration, and drainage for beneficial reuse to attain applicable water quality standards, and not for the purposes of providing wetlands habitat, open waters, or association with natural stream courses, this definition of Riparian/Riverine Areas does not apply to the constructed stormwater detention basin within the CBU Specific Plan Zone, and it is not subject to administration in accordance with the MSHCP. Impacts to riparian/riverine resources would be less than significant and no mitigation is required. (DEIR, p. 4.4-15.)

## **2. Wetlands**

**Threshold C:** Would the Project 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?

**Finding:** Less than significant impact. (DEIR, pp. 4.4-15 – 4.4-16.)

**Explanation:** The Project site has been previously graded, is fully developed with university and associated facilities, and is completely surrounded by urban development. A constructed storm water detention basin is located between Lot 1 and Magnolia Avenue and has the potential to support riparian/riverine resources. However, the regularly maintained basin is a local storm water management facility not located on land previously part of a natural streambed or drainage area and is exempt from Section 404 of the CWA because it is constructed for the purposes of storm water capture, retention, infiltration, and drainage for beneficial reuse to attain applicable water quality standards, and not for the purposes of providing wetlands habitat, open waters, or association with natural stream courses. Therefore, the storm water basin is subject to the United States Environmental Protection Agency’s (EPA) definition of, “Artificial lakes or ponds created by excavating and/or diking dry land and used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing” [for aquatic areas] generally not protected by the Clean Water Act.

As previously stated, there is currently no approved guidance for delineating areas potentially subject to RWQCB jurisdiction. Generally, areas subject to RWQCB regulation are typically determined to coincide with areas subject to USACE jurisdiction as recommended by the RWQCB’s September 2004 Workplan. Since the storm water detention basin is exempt from USACE jurisdiction, RWQCB jurisdiction in this case is coincident with USACE jurisdiction for

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<sup>2</sup> Section 6.0 MSHCP Implementation Structure. *Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP)*. Volume 1, Section 6.1.2 <http://www.rctlma.org/Portals/0/mshcp/volume1/sec6.html> (Accessed August 23, 2017).



purposes of CWA Section 401 certification. For these reasons, impacts to federally protected wetlands would be less than significant and no mitigation is required. (DEIR, p. 4.4-16.)

### **3. Wildlife Movement**

**Threshold D:** Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?

**Finding:** Less than significant impact. (DEIR, p. 4.4-16.)

**Explanation:** The Project site has been previously graded, is fully developed with university and associated facilities, and is surrounded by urban development on all sides. The Project site is not within or adjacent to an MSHCP Criteria Cell, Core, or Linkages, Public/Quasi Public lands, NEPSSA or CASSA, or additional species survey areas. Therefore, the Project site is not within an established native resident or migratory wildlife corridor, and does not contain any native wildlife nursery sites. Impacts related to the movement of native or migratory species are considered less than significant, and no mitigation is required. (DEIR, p. 4.4-16.)

### **4. Habitat Conservation Plans**

**Threshold F:** Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

**Finding:** Less than significant impact. (DEIR, p. 4.4-18.)

**Explanation:** The Project is subject to compliance with the Western Riverside MSHCP because the City is a Permittee to the MSHCP. The Project site is within the Cities of Riverside and Norco Area Plan of the MSHCP. However, the Project site is not within or adjacent to an MSHCP Criteria Cell, Core, or Linkages, or Public/Quasi Public lands. The proposed Project has no conservation requirements towards building out of the MSHCP Reserve. Since no Conservation Areas are near the Project site, compliance with Section 6.1.4 of the MSHCP is not needed. The Project site does not support any riparian/riverine resources, as defined by Volume 1, Section 6.1.2. of the MSHCP, that would be affected by the proposed Project, and is therefore compliant with Section 6.1.2 of the MSHCP. Additionally, the Project site is not within a NEPSSA area per Section 6.1.3 of the MSHCP; a CASSA area or Additional Species Survey Area per Section 6.3.2. of the MSHCP. Therefore, the proposed Project is not subject to any survey requirements of the MSHCP. The Project will participate in the MSHCP through the payment of the Local Development Mitigation Fee at the time building permits are issued pursuant to provisions of Ordinance No. 6709 of the City Municipal Code and Ordinance No. 810.2 of the County of Riverside. Impacts related to conflict with the MSHCP are less than significant, and no mitigation is required.

The Project site is within the SKR-HCP fee boundary, but is not within a SKR-HCP core reserve. Future construction under the CBUSP Amendment is subject to applicable per-acre mitigation fees. The City's SKR fees are required to be paid at the time of grading permit issuance, pursuant to Riverside Municipal Code Section 16.40.040. Payment of applicable regional, State and federal conservation, endangered and threatened species mitigation fees will ensure impacts related to

conflict with conservation plans are less than significant. No mitigation is required. (DEIR, p. 4.4-18.)

## **E. CULTURAL RESOURCES**

### **1. Human Remains**

**Threshold D:** Would the project disturb any human remains, including those interred outside of formal cemeteries?

**Finding:** Less than significant impact. (DEIR, p. 4.5-54 - 4.5-55.)

**Explanation:** Due to the Project site being previously developed, the likelihood of encountering human remains is minimal. In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving activities, no further disturbance shall occur until the Project proponent has notified the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the County Coroner has made a determination of origin and disposition. Section 7050.5 of the California Health and Safety Code requires that excavation be stopped in the vicinity of the discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s) (MLDs). The MLDs shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the MLDs to determine the most appropriate means of treating the human remains and any associated grave artifacts.

The specific locations of Native American burials and reburials shall be proprietary and not disclosed to the general public. The County Coroner will notify the NAHC in accordance with California Public Resources Code 5097.98. As adherence to state regulations is required for all development, impacts associated with the inadvertent discovery of human remains would be less than significant. No mitigation is required. (DEIR, p. 4.5-55.)

## **F. GEOLOGY AND SOILS**

### **1. Geology-Related Hazards**

**Thresholds A:** Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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?

**Finding:** Less than significant impact. (DEIR, p. 4.6-17.)

**Explanation:** The proposed Project site is not located within an Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zone Act or as defined by the City's *General Plan 2025*. In addition, there is no evidence of any faults or faulting activity on the

Project site. The closest active or potentially active fault from the Project site is a northwest-southeast trending unnamed fault located approximately six (6) miles east of the Project site along the State Route 60/Interstate 215 freeway junction, and other known active faults are further away. Thus, the potential for damage due to fault rupture is considered remote. Nonetheless, all subsequent projects administered under the Project will be required to comply with the building design standards of the CBC in effect at the time of submittal of a development application for construction regarding seismicity, and all grading plans will be subject to City Staff review for regulatory compliance. For these reasons, less than significant impacts are expected to occur in relation to fault ruptures. No mitigation is required. (DEIR, p. 4.6-17.)

**Thresholds B:** Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

**Finding:** Less than significant impact. (DEIR, pp. 4.6-17 - 4.6-18.)

**Explanation:** Southern California is a seismically active area and therefore, will continue to be subject to ground shaking resulting of seismic activity on regional faults. While no known active faults traverse the City, ground shaking from earthquakes associated with nearby and more distant faults is expected to occur during the lifetime of the Project. According to the City's *General Plan 2025 and Supporting Documents EIR*, the City is surrounded by several significant faults, including the Elsinore Fault 9.5 miles southwest of the Project site, the San Jacinto Fault 12.5 miles northeast of the Project site, and the San Andreas Fault 20 miles northeast of the Project site, in addition to the unnamed fault along the State Route 60/Interstate 215 freeway junction located approximately six (6) miles east of the Project site.

Due to the proximity of significant faults with the potential to generate moderate to large earthquakes, the City, and therefore the Project site, has the potential to experience ground acceleration greater than 35 to 43 percent. However, these probabilistic ground motion values are within current limits established by the CBC and UBC. Pursuant to State law, all future design and construction administered under the CBUSP Amendment will be designed to resist seismic impacts in accordance with CBC requirements in effect at the time of submittal of a development application and Title 16, Buildings and Construction, of the RMC. Prior to issuance of any entitlements, the City will review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Additionally, all grading plans will be subject to City Staff review for regulatory compliance. Moreover, there is nothing unique about the Project site that would require additional measures beyond compliance with the adopted Building Code. Therefore, less than significant impacts are expected to occur due to ground shaking. No mitigation is required. (DEIR, p. 4.6-17.)

**Thresholds D:** Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

**Finding:** Less than significant impact. (DEIR, p. 4.6-19.)

Explanation: The Geology and Soils section of the City's *General Plan 2025 Final Program EIR* states that "areas of high susceptibility to seismically induced landslides and rockfalls correspond to steep slopes in excess of 30 percent." Figure 5.6-1 of the City's *General Plan 2025 Final Program EIR* indicates that the Project area is located on land identified as having a 0-10% slope, which is the lowest of the four potential steep slope categories. Additionally, the Project site has been previously excavated, filled, graded, and leveled with the development of the CBU campus. Surrounding areas are also primarily developed and not located on a hillside. Additionally, pursuant to CAL-OSHA excavation standards, temporary slopes for construction will be managed according to applicable safety and building regulations. Therefore, impacts related to landslides are considered to be less than significant. No mitigation is required. (DEIR, p. 4.6-19.)

## **2. Soils**

**Threshold E:** Would the Project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant impact. (DEIR, pp. 4.6-20 - 4.6-21.)

Explanation: Figure 5.6-1 of the City's *General Plan 2025 Final Program EIR* indicates that the Project site is located on land identified as having a 0-10% slope, the lowest category of slope identified on that figure. The Project site has been previously graded, and are fully developed, urbanized, and completely surrounded by urban development. Therefore, approval of the Project would not result in substantial soil erosion or loss of topsoil, but construction activities associated with future development facilitated by the proposed Project would have the potential to cause soil erosion or loss of topsoil.

Construction activities such as excavation and grading may have the potential to cause soil erosion or the loss of topsoil. Short-term erosion effects during the construction phase of the project would be prevented through required grading permits and implementation of a SWPPP through compliance with the NPDES program and the incorporation of best management practices (BMPs), as required, intended to reduce soil erosion. Prior to the issuance of grading permits, the project proponent will be required to prepare and submit project- and site-specific, detailed grading plans to the City as each development or site improvement is proposed. These plans will be prepared in conformance with applicable standards of the City of Riverside. Construction of off-site utility and roadway improvements will also result in the movement of soil, and would be subject to the same permitting and plan checking processes.

Future development and improvements that entail ground disturbance and require Construction General Permits would require a SWPPP and BMPs to address erosion and discharge impacts associated with proposed on-site grading of project sites. Compliance with storm water regulations include minimizing storm water contact with potential pollutants by providing covers and secondary containment for construction materials, designating areas away from storm drain systems for storing equipment and materials and implementing good housekeeping practices at the construction site. Additionally, future development and improvements that disturb more than one acre of soil are required to obtain a NPDES permit.

If future development and improvements administered under the CBUSP Amendment are classified as "Priority Development Projects" pursuant to the *Water Quality Management Plan for*

*the Santa Ana Region of Riverside County*, they would be required to develop project- and site-specific Water Quality Management Plans (WQMP) to help reduce potential impacts to soil erosion post construction. In addition, all future project administered under the Project that entail ground disturbance must comply with Title 17, Grading, of the RMC, which requires the implementation of measures designed to minimize soil erosion.

The soils underlying the Project site have a very low to moderate susceptibility to erosion by water, according to soil survey data from the NRCS. However, with preparation and adherence to the requirements of project- and site-specific SWPPP, BMPs, NPDES, and WQMP as applicable, and compliance with Title 17, Grading, of the RMC, construction and operational impacts associated with soil erosion hazards are considered to be less than significant. No mitigation is required. (DEIR, p. 4.6-21.)

**Threshold H:** Would the Project 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?

**Finding:** No impact. (DEIR, p. 4.6-24.)

**Explanation:** All buildings administered by the Project will be connected to existing wastewater facilities (sewer) owned and operated by the City in accordance with RMC Title 14, Section 14.08.030 - Connection to public sewer is required. These existing sewer systems are as follows:

- Eight-inch sewer line originating in Adams Street just northwest of Briarwood Drive and draining westerly on Adams Street to Magnolia Avenue.
- Eight-inch sewer line in Magnolia Avenue that drains southwesterly to Monroe Street.
- Fifteen-inch sewer trunk line in Monroe Avenue northwest of the campus.
- Eight-inch sewer line in Diana Avenue from north end of campus to Monroe Street.
- Twelve-inch sewer line that flows northwesterly on Monroe Street from Diana Avenue to the beginning of the eight-inch and 15-inch parallel system.

A ten-inch sewer connection is planned to connect with the existing twelve-inch sewer line in Monroe Street. Existing septic tanks will be removed and disposed of in accordance to local and State laws and regulations as future development projects are proposed under the Project. All future uses on the Project site will be connected to the City's sewer system and will not use septic tanks. No impact would occur, and no mitigation is required. (DEIR, p. 4.6-24.)

## **G. GREENHOUSE GAS EMISSIONS**

### **1. Greenhouse Gas Emissions**

**Threshold A:** Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Finding: Less than significant with mitigation. (DEIR, pp. 4.7-18 – 4.7-21.)

Explanation: Construction and operation of the proposed CBUSP would generate GHG emissions, with the majority of energy consumption and associated generation of GHG emissions occurring during the CBUSP's operation as opposed to during its construction. Typically, more than 80 percent of the total energy consumption takes place during the use of buildings and less than 20 percent of energy is consumed during construction (United Nations Environment Programme 2007). Overall, the following activities associated with the proposed project could directly or indirectly contribute to the generation of GHG emissions:

- Construction Activities;
- Gas, Electricity, and Water Use;
- Solid Waste Disposal
- Motor Vehicle Use

The key assumptions used to estimate Project GHG emissions during Project construction included the following:

- 49.57 acres of total land disturbance; and
- 4 acres maximum acres disturbed per day.

Key assumptions used to estimate Project GHG emissions during Project operations included the following:

- 3,961 additional University/College students;
- 3,961 additional student dorms/beds;
- 400,000 square feet of additional building area (administrative, academic, housing, recreational) on 36.71 acres;
- 805,000 square feet of additional parking structures on 12.86 acres; and
- 5,291 additional trips per day (per Project TIA).

Long-term operation of the proposed Project would generate GHG emissions from area and mobile sources and indirect emissions from stationary sources associated with energy consumption. Mobile-source emissions of GHGs would include Project-generated vehicle trips associated with on-site energy use and residential vehicle trips. Area-source emissions would be associated with activities including landscaping and maintenance of the proposed project, natural gas for heating, and other sources. Increases in stationary-source emissions would also occur at off-site utility providers as a result of demand for electricity, natural gas, and water by the proposed Project.

A project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. The City has adopted a Climate Action Plan that qualifies as a plan for the reduction of greenhouse gas emissions pursuant to the CEQA Guidelines. The Project's consistency with the City's Climate Action Plan is discussed in Section 4.2, G. Greenhouse Gas Emissions, Threshold B. Nonetheless, the Project's GHG emissions are forecast in this section for informational purposes.

The Project's GHG emissions estimates are 25,999 MT CO<sub>2</sub>e/yr, which is 0.026 MMT CO<sub>2</sub>e per year (MMT CO<sub>2</sub>e/yr). For comparison, the existing emissions from the entire SCAG region are estimated to be approximately 176.79 MMT CO<sub>2</sub>e/yr, and the existing emissions for the entire State are estimated at approximately 448 MMT CO<sub>2</sub>e/yr.

The Project includes Project Design Features and additional mitigation (i.e., **MM-GHG-1** and **MM-GHG-2** discussed in Section 4.2, G. Greenhouse Gas Emissions, Threshold B) to provide consistency with the City's Climate Action Plan and in so doing reducing the proposed Project's greenhouse gas emissions to a less than significant level and no further mitigation is required. (DEIR, p. 4.7-21.)

## **H. HAZARDS AND HAZARDOUS MATERIALS**

### **1. Routine Transport of Hazardous Materials**

**Threshold A:** Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

**Finding:** Less than significant impact. (DEIR, pp. 4.8-16 – 4.8-17.)

**Explanation:** The Project proposes a framework under which specific development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment. As a University campus with educational, residential, and commercial uses, future development projects may include the transport, use, or disposal of hazardous materials.

The United States Department of Transportation (USDOT) Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in Title 49 of the *Code of Federal Regulations*, and implemented by Title 13 of the CCR. Additionally as previously stated, CBU has established and implements a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material pursuant to California Health and Safety Code Sections 25503 and 25507. Specifically, CBU developed its *Hazardous Material & Hazardous Waste Maintenance Program* to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site. The plan is constantly updated and outlines proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an updated spill contingency plan, outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol. The step by step procedures for initial spill response and reporting requirements were developed during exploration for employees and

contractors to reference in the event of a spill. This plan was developed to educate employees/contractors to promote spill prevention and minimize spill occurrences.

Through the compliance with all applicable federal and State laws, and implementation of CBU's *Hazardous Material & Hazardous Waste Maintenance Program* for every future development proposed pursuant to the CBUSP Amendment the likelihood and severity of accidents related to the routine transport, use, or disposal of hazardous materials would be less than significant. No mitigation is required. (DEIR, p. 4.8-17.)

## **2. Vicinity of Private Airport**

**Threshold 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?

Finding: No impact. (DEIR, p. 4.8-25.)

Explanation: There are no private airstrips located within the City of Riverside. Thus, the proposed Project will not result in a safety hazard for people residing or working in the Project area. Therefore, no impact will occur. No mitigation is required. (DEIR, p. 4.8-25.)

## **3. Emergency Plans**

**Threshold G:** Would the Project impair implementation of or physically interfere with an adopted emergency response plan or an emergency evacuation plan?

Finding: Less than significant impact. (DEIR, p. 4.8-25.)

Explanation: The Project includes development standards designed to maintain sufficient emergency access throughout the campus. As of 2017, the CBU campus had one main gate, one secondary gateway, and several emergency access points to/from the surrounding public street system. Emergency vehicle access will be provided at multiple points from Magnolia Avenue, Adams Street, and Monroe Street and from the internal primary and secondary roadways. Emergency access will be unobstructed, with the roads to include stencil markings to read "NO PARKING – FIRE LANE." Vertical clearance will meet the standards of the City Fire Department, as will the lockable gates. Emergency vehicle access travel paths will comply with the California Fire Code and all City codes and regulations.

Any street closures necessary to construct proposed improvements under the Project will be temporary and managed in compliance with California Fire Code and all City codes and regulations so as not to interfere or impede with any emergency response or evacuation plan. The proposed Project is required to be in compliance with California Fire Code and all City Codes; therefore, impacts are less than significant. No mitigation is required. (DEIR, p. 4.8-25.)

## **4. Wildland Fires**

**Threshold H:** Would the Project 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?



Finding: No impact. (DEIR, pp. 4.8-25 - 4.8-26.)

Explanation: The proposed Project is located in an urbanized area where no wildlands exist, and the property is not located within a Fire Hazard Area or adjacent to areas subject to wildland fire hazards. The CBUSP Amendment incorporates development standards designed to minimize risk of fire. The minimum distance between buildings shall be as required by the Fire Code. To combat fires, the CBUSP Amendment maintains minimum fire flow requirements depending on building usage. The fire flow requirement for academic buildings is a minimum 1,750 gallons per minute (gpm) at 20 pounds per square inch (psi). The requirement for multiple-unit residential buildings is 1,500 gpm at a minimum of 20 psi. Fire flow calculations will be required during final design for each building to ensure adequate protection. In the absence of wildlands and/or Fire Hazard Areas in proximity to the Project area, no impact regarding wildland fires from this Project will occur. No mitigation is required. (DEIR, p. 4.8-26.)

## **I. HYDROLOGY AND WATER QUALITY**

### **1. Water Quality Standards and Water Runoff**

**Threshold A:** Would the project violate any water quality standards or waste discharge requirements?

Finding: Less than significant impact. (DEIR, pp. 4.9-21 – 4.9-23.)

Explanation: Construction activities for each individual subsequent project resulting from approval for the Project would comply with the requirements of the State Water Resource Control Boards (SWRCB) Construction General Permit Title 14, and Title 17 of the RMC. In compliance with Construction General Permit, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and construction BMPs detailed in the SWPPP would be implemented during construction activities to minimize erosion and siltation and prevent spills. Construction BMPs would include, but not be limited to: erosion control, sediment control, and good housekeeping practices. These BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. The SWPPP would be developed, and construction BMPs selected and implemented to target pollutants of concern during construction. The construction BMPs would be designed to retain sediment and other pollutants on site so they would not reach receiving waters. In addition, an Interim Erosion Control Plan would be prepared for each project in compliance with Chapter 17.16 of the RMC. The Erosion Control Plan would specify the erosion control measures that would be implemented to minimize erosion and siltation during construction.

If groundwater or perched groundwater is encountered during construction and groundwater dewatering is necessary, disposal of dewatered groundwater can introduce total dissolved solids and other constituents to surface waters. Any groundwater dewatering during excavation would be conducted in accordance with the Santa Ana RWQCB's Groundwater Discharge Permit, which would require testing and treatment (as necessary) of groundwater encountered during construction prior to discharge to surface waters.

The Project site is currently developed. The majority of the campus is comprised of impervious surface, with the exception of open space, recreation, and landscaped areas comprised generally

of pervious surfaces. Upon subsequent construction of buildings and parking lots, the permeable area on the CBU Specific Plan Zone would increase given that the CBUSP, at build out, anticipates an increase in open space and landscape areas. The decrease in impervious surface area would reduce peak flow of stormwater runoff from the CBU Specific Plan Zone, which would reduce pollutant loading to downstream receiving waters.

Development of any future projects that change the land use would change operational pollutants of concern that would be introduced to stormwater runoff from the Project site. The following pollutants of concern are anticipated to be generated from the campus: sediment, nutrients, trash and debris, oxygen demand substances, bacteria and virus/ pathogens, oil and grease, pesticides, and organic compounds and metals. As discussed below, operational BMPs would be introduced to reduce these pollutants of concern.

Adjacent to Magnolia Avenue to the west of the main campus entrance is a water quality basin that serves to detain and filter storm water runoff. The existing detention basin will continue to retain stormwater runoff from the campus and allow for treatment to attain applicable water quality standards and allow for some infiltration into the local groundwater aquifer. In addition to the water quality basin which serves the CBU original campus core, each individual subsequent project or improvement within the CBU Specific Plan Zone would be required to prepare a WQMP, in compliance with the requirements of the MS4 Permit, that details the site design, source control, Low Impact Development (LID) and treatment BMPs that would be implemented as part of each subsequent project to treat pollutants of concern. Section 4.9.4 identifies construction and operational BMPs which can be applied to subsequent projects and improvements that would be developed within the Project.

Because compliance with the requirements of the Construction General Permit, RMC, Groundwater Discharge Permit, and MS4 Permit, would require implementation of construction and operational BMPs and testing and treatment of dewatered groundwater to reduce pollutants of concern, potential impacts related to violation of water quality standards, waste discharge requirements, and degradation of water quality would be less than significant. No mitigation is required. (DEIR, p. 4.9-23.)

**Threshold E:** Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

**Finding:** Less than significant impact. (DEIR, pp. 4.9-26 – 4.9-28.)

**Explanation:** The majority of the Project site is developed with impervious surface, with the exception of open space, recreation and landscaped areas generally comprised of pervious surfaces. Upon subsequent construction of buildings and parking lots, the permeable area within the Project would increase given that the University, at build out, anticipates an increase in open space and landscape areas. The decrease in impervious surface area would reduce peak flow of stormwater runoff. As new development on the campus occurs, there is a potential for localized increases in stormwater runoff. Localized storm drains would be constructed and connected to existing storm drain systems that flow to the basin and would be sized with adequate capacity to accommodate on-site runoff.

The Hydrology Study prepared for the Project examined future storm water flows attributable to the proposed Project. All future flows resulting from implementation of the CBUSP Amendment would be directed to the existing Magnolia Basin. Existing drainage patterns would be respected throughout the campus to reduce the potential of diversion of flows. The future flows to the basin estimated for year 2025 are 73.22 cfs in the 10-year storm event and 125.87 cfs in the 100-year storm event. The net increase in flow to the basin is 2.52 cfs in the 10-year storm event, and 4.29 cfs in the 100-year storm event. The existing basin decreases the 10-year storm flow to all downstream conveyances by detaining approximately 38 cfs, while allowing 33.1 cfs to exit into the Magnolia Avenue storm drain. The 4.29 cfs increase for the 100-year future storm condition has minimal effect on all downstream conveyances, including the 30" Magnolia Avenue storm drain and the Magnolia Trapezoidal Channel.

Stormwater runoff from the CBU original campus core ultimately drains northwesterly to the Monroe Street Channel. The Monroe Storm Drain Stage I Line has adequate capacity to accommodate all flows associated with the CBU campus, and the onsite basin will continue to capture and detain increased runoff to keep the outflow at or below existing storm flows. Such enhancements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations. For these reasons, with construction of the storm water improvements described in the Project, development of subsequent projects and improvements within the Project site would not create or contribute additional runoff water to the downstream storm drain system that would exceed the storm drain system capacity.

As discussed previously, construction of any subsequent projects or improvements on the Project site has the potential to introduce pollutants to the storm drainage system from erosion, siltation, and accidental spills. However, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs to be implemented during construction of subsequent development projects or improvements to reduce impacts to water quality, including those impacts associated with soil erosion, siltation, and spills. In addition, an Interim Erosion Control Plan would be prepared for each subsequent development project or improvement in compliance with Chapter 17.16 of the RMC. The Erosion Control Plan would specify the erosion control measures that would be implemented to minimize erosion and siltation during construction. In the event that groundwater is encountered during construction and required disposal in the storm drain system, any groundwater dewatering would be minimal and short-term and would not be anticipated to exceed the capacity of the storm drain system. In addition, any groundwater dewatering during excavation would be conducted in accordance with the Groundwater Discharge Permit, which would require testing and treatment (as necessary) of groundwater encountered during dewatering or groundwater well construction prior to release so as not to provide additional sources of polluted runoff to the storm drain system. As discussed previously, a WQMP would be prepared for subsequent development projects or improvements and would specify the source control, site design, LID, and treatment BMPs that would be implemented to target and reduce pollutants of concern in storm water runoff from the campus during operation.

With implementation of construction and operational BMPs and construction of the storm water improvements proposed by the Project, development in accordance with the Project would not provide substantial additional sources of polluted runoff. Therefore, Project impacts related to the creation or contribution of runoff water which would exceed the capacity of existing or planned

storm water drainage systems or the provision of substantial additional sources of polluted runoff would be less than significant. No mitigation is required. (DEIR, p. 4.9-28.)

## **2. Groundwater Supplies**

**Threshold B:** Would the project 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)?

**Finding:** Less than significant impact. (DEIR, pp. 4.9-23 – 4.9-24.)

**Explanation:** If groundwater or perched groundwater is encountered during construction of any subsequent projects or improvements within the Project site, any groundwater dewatering would be minimal and short-term and would not be anticipated to substantially change the groundwater level on or in the vicinity of the subsequent project site or interfere with recharge. Subsequent projects or improvements within the Project site would not require groundwater dewatering during operation. As discussed previously, the proposed Project would decrease impervious surface areas on site which would ultimately increase infiltration. The existing detention basin will continue to allow for some infiltration of stormwater into the local groundwater aquifer. Additional improvements will be implemented if determined to be necessary as required to meet the demand of individual future projects resulting from approval of the Project, based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

CBU owns and operates two on-site wells used for irrigation purposes only. The wells are equipped with 60-horsepower pumps with an approximate maximum capacity of 265 gallons per minute, and CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields.

CBU maintains an “overlying water right” to pump groundwater from the Riverside-Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. CBU’s wells have been designed and constructed in accordance with Section 13801 of the California Water Code (CWC), Chapter 6.28 of the RMC, and the provisions of City Resolution No. 14733. Pursuant to the CWC, CBU files an annual notice of its groundwater use with the California State Water Board and/or Riverside Public Utilities Department (RPU), thereby maintaining private water rights for the use of their on-site wells.

Through implementation of WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations, as well as compliance with applicable regulations regarding groundwater extraction on private property, impacts related to depletion of groundwater supplies or interference with groundwater recharge during construction and operation would be less than significant. No mitigation is required. (DEIR, p. 5.9-23.)

### 3. Existing Drainage Patterns and Runoff

**Threshold C:** Would the project 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?

Finding: Less than significant impact. (DEIR, pp. 4.9-24 – 4.9-25.)

Explanation: During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. The Construction General Permit requires preparation of a SWPPP to identify construction BMPs that would be implemented to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. In addition, an Interim Erosion Control Plan would be prepared for each subsequent project or improvement in compliance with Chapter 17.16 of the RMC. The Erosion Control Plan would specify the erosion control measures that would be implemented to minimize erosion and siltation during construction.

The majority of the Project site is comprised of impervious surface, with the exception of open space, recreation and landscaped areas generally comprised of pervious surfaces. Upon subsequent construction of buildings and parking lots, the permeable areas within the Project site would increase given that the Project anticipates an increase in open space and landscape areas. The decrease in impervious surface area would reduce peak flow of stormwater runoff within the Project site. However, as new development on the campus occurs, there is a potential for localized increases in stormwater runoff. Localized storm drains would be constructed and connected to existing storm drain systems that flow to the onsite detention basin. Existing drainage patterns would be respected throughout the campus to reduce the potential of diversion of flows. Stormwater runoff from the CBU original campus core ultimately drains northwesterly to the Monroe Street Channel. The onsite detention basin would continue to capture and detain increased runoff to keep the outflow at or below existing storm flows, which would minimize impacts related to off-site erosion and siltation. At build-out, CBU would consist of impervious surface areas that are not prone to erosion or siltation and landscaping, which would minimize on-site erosion and siltation. Finally, the closest river or stream is the Santa Ana River located approximately 2.1 miles north of the Project site; therefore, development of subsequent projects and improvements in accordance with the Project would not alter the course of a stream or river.

Development of subsequent projects and improvements within the Project would not 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 erosion or siltation or off site. Project impacts related to erosion and siltation would be less than significant. No mitigation is required. (DEIR, p. 4.9-24.)

**Threshold D:** Would the project 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 that would result in flooding on- or off-site?

Finding: Less than significant impact. (DEIR, pp. 4.9-25- 4.9-26.)

Explanation: The Project site is currently developed, with the majority of the campus comprised of impervious surface. Areas of open space, recreation and landscaping, however, are generally comprised of pervious surfaces. Upon subsequent construction of buildings and parking lots, the permeable area within the Project would increase given that the CBUSP, at build out, anticipates an increase in open space and landscape areas. The decrease in impervious surface area would reduce peak flow of stormwater runoff. As new development on the campus occurs, there is a potential for localized increases in stormwater runoff. Localized storm drains would be constructed and connected to existing storm drain systems that flow to the basin and would be sized with adequate capacity to accommodate on-site runoff.

Existing drainage patterns would be respected throughout the campus to reduce the potential of diversion of flows. Stormwater runoff from the CBU original campus core ultimately drains northwesterly to the Monroe Street Channel. The Monroe Storm Drain Stage I Line has adequate capacity (see analysis for Threshold E) to accommodate all flows associated with the Project, and the onsite basin will continue to capture and detain increased runoff to keep the outflow at or below existing storm flows. Improvements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations. Finally, the closest river or stream is the Santa Ana River located approximately 2.1 miles north of the Project site; therefore, development of subsequent projects and improvements in accordance with the Project would not alter the course of a stream or river.

For the reasons discussed above, development of subsequent projects and improvements within the CBUSP would not 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. Project impacts related to flooding would be less than significant. No mitigation is required. (DEIR, p. 4.9-26.)

#### **4. Otherwise Degrade Water Quality**

**Threshold F:** Would the project otherwise substantially degrade water quality?

Finding: Less than significant impact. (DEIR, p. 4.9-28.)

Explanation: Refer to the discussion under Threshold A above. (DEIR, p. 4.9-28.)

#### **5. Flood Hazards**

**Threshold G:** Would the project 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?

Finding: No impact. (DEIR, p. 4.9-28.)

Explanation: According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map No. 06065C0720G, August 28, 2009), the CBU Specific Plan Zone is not

located within a 100-year floodplain. The Project site is mapped within Zone X, which is defined as the area determined to be outside the 0.2 percent annual change floodplain (500-year floodplain). In addition, the Project site is not located within a DWR Awareness Floodplain. Therefore, implementation of the Project would not place housing within a 100-year flood hazard area, and no impacts would occur. No mitigation is required. (DEIR, p. 4.9-28.)

**Threshold H:** Would the project place within a 100-year flood hazard area structures that would impede or redirect flood flows?

Finding: No Impact. (DEIR, p. 4.9-28.)

Explanation: The Project site is not located within a 100-year floodplain or a DWR Awareness Floodplain. The Project site is mapped within Zone X, which is defined as the area determined to be outside the 0.2 percent annual change floodplain (500-year floodplain). Therefore, implementation of the Project would not place structures within a 100-year flood hazard area, and no impacts would occur. No mitigation is required. (DEIR, p. 4.9-28.)

## **6. Dam or Levee Failure**

**Threshold I:** Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of a failure of a levee or dam?

Finding: Less than significant impact. (DEIR, p. 4.9-28 – 4.9-29.)

Explanation: According to the Public Safety Element of the City's General Plan 2025, the northwest side of the Project site is located within the inundation zone of the Prenda Dam and the Woodcrest Dam covers the remainder of the Project site. Implementation of the Project would not increase the chance of inundation from failure of Prenda Dam or Woodcrest Dam. Both Prenda Dam and Woodcrest Dam are maintained and inspected to ensure their integrity and to ensure that risks are minimized. The safety of these dams is the responsibility of the United States Army Corps of Engineers, which conducts inspections on a regular basis. Although implementation of the Project would result in an additional students and staff on the Project site, the Project would not increase the chance of inundation from failure of Prenda Dam or Woodcrest Dam. Therefore, impacts from exposure of people or structures to loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, would be less than significant. No mitigation is required. (DEIR, p. 4.9-29.)

## **7. Inundation**

**Threshold J:** Would the project [expose people or structures to a significant risk or loss, injury, or death involving] inundation by seiche, tsunami, or mudflow?

Finding: Less than significant impact. (DEIR, p. 4.9-29.)

Explanation: There are no unenclosed water retention facilities in close proximity to the Project site. The closest unenclosed body of water is Lake Matthews, which is approximately 5 miles southwest of the CBU Specific Plan Zone. The risk associated with possible seiche waves, therefore, is less than significant impact. No mitigation is necessary.

The Project site is located approximately 35 miles from the ocean shoreline and is not in a tsunami inundation area. The risk associated with tsunamis is, therefore, no impact would occur with implementation of the Project. No mitigation is required.

The Project site is relatively flat, and no existing landslides are present on the property. Additionally, the Project site has been previously excavated, filled, graded, and leveled with the development of CBU. Surrounding areas are also primarily developed and not located on a hillside. The risk associated with possible mudflows and mudslides is, therefore, less than significant. No mitigation is necessary. (DEIR, p. 4.9-29.)

## **J. LAND USE AND PLANNING**

### **1. Divide a Community**

**Threshold A:** Would the project physically divide an established community?

**Finding:** Less than significant impact. (DEIR, pp. 4.10-24 – 4.10-26.)

**Explanation:** The proposed Project will replace the existing 2013 CBUSP to facilitate a more urban-style development pattern to better conform to the existing, urbanized community surrounding the CBU campus. Additionally, the 2013 CBUSP currently in effect provides for a combination of academic, mixed use, and high-density residential land uses, and the proposed Project will continue this pattern of development with an improved pedestrian- and public transit-friendly layout to facilitate greater and safer accessibility to and from the surrounding community.

Objective 2 of the CBU SP Amendment proposes to create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping, while Policy 2.1 provides edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards outlined in Section 4.10.4 above (Chapter 4 of the CBU SP Amendment). Policy 2.2 proposes to create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus. Landscape buffers and gateway treatments will provide visual cues that differentiate the campus from surrounding areas but would coincide with existing and planned green spaces. Additionally, Policy 4.1 strives to ensure consistency with City of Riverside street standards regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus in order to integrate uniformly with the surrounding community.

According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University. The Design Guidelines outlined in the proposed CBUSP Amendment would replace the design guidelines of the *Magnolia Avenue Specific Plan*. However, implementation of the proposed Project would maintain the established residential character of the Magnolia Heritage District, while allowing for higher intensity pedestrian-oriented residential and mixed-use development on opportunity sites, particularly along Magnolia Avenue. Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage,



in accordance with *Magnolia Avenue Specific Plan* Corridor-Wide Objective 2. As detailed in Section 4.10.4 above (Chapter 7 of the CBUSP Amendment), CBU streetscape design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians, bicyclists, and users of other non-motorized modes of transportation, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Diana Avenue and State Route 91, Adams Street, and Monroe Street will require greater coordination with the City and other agencies (e.g., Department of Public Works and Caltrans) to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements. A new dramatic entrance to the campus at Adams Street and Briarwood Drive will connect to Campus Bridge Drive and link the urban mixed uses with the balance of the campus pursuant to CBUSP Amendment Policy 2.2.

The University intends to pursue the eventual vacation of Wilma and Emily Courts, which are cul-de-sac streets branching from Diana Avenue. As well as the vacation of Diana Avenue in tandem with the closure of Diana Avenue at Adams Street, which would involve coordinating with the Public Works Department consistent with the City's Street Vacation process. Although Wilma and Emily Courts would no longer be public streets, they will become private access roads and continue to provide access to the southerly portion of the site through build out of the Project.

Implementation of the Project would be commensurate with the existing on-campus and surrounding land uses, which are academic, mixed use, and high-density residential in nature, and therefore would integrate uniformly with the established community. All future projects and construction facilitated by the proposed Project will be required to undergo Planning Staff review and approval to ensure design elements are proposed and implemented in accordance with the development plan (Chapter 3), land use regulations and development standards (Chapter 4), design guidelines (Chapter 7), and implementation methods (Chapter 8) in support of the objectives and policies of the CBUSP Amendment, as outlined in Section 4.10.4 above. Additionally, the Project must comply with applicable chapters of Title 19 (*Zoning Code*), as well as the City's *General Plan 2025*.

The Project would replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan* within the Project site. Implementation of the Project is intended to ensure design consistency throughout the Project site for an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model. However, the Project retains a degree of flexibility to accommodate various development types within the Project site and facilitate a compatible transition between the Project site and adjacent properties that would be subject to the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*. For these reasons, the proposed Project will have a less than significant impact to established communities. No mitigation is required. (DEIR, p. 4.10-26.)

## 2. Plans, Policies or Regulations

**Threshold B:** Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the airport land use plan, or zoning ordinance) adopted for the purpose of avoiding mitigating an environmental effect?

**Finding:** Less than significant impact. (DEIR, pp. 4.10-26 - 4.10-76.)

**Explanation:** The proposed Project is a Specific Plan Amendment that will modify the current CBU SP approved in 2013. As detailed in Table 4.10-A of the EIR prepared for the Project, the Project is consistent with the Land Use, Circulation and Community Mobility, Housing, Public Safety, Noise Open Space and Conservation, Air Quality, Public Facilities, Parks and Recreation, and Historic Preservation Elements in the General Plan. In addition, Table 4.10-B of the EIR demonstrates the Project's consistency with the *Magnolia Avenue Specific Plan*. As established in these two tables of the Draft EIR, the Project does not conflict with any land use plan, policy, or regulation as the land use and zoning would remain consistent. Therefore, impacts from the proposed Project would be less than significant. (DEIR, p. 4.10-76.)

A discussion of the proposed Project's consistency with the applicable Air Quality Management Plan is discussed in Section 4.1-C1 and the proposed Project's consistency with applicable habitat conservation plans or natural community conservation plans is addressed in Section 4.1-D4.

**Threshold C:** Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

**Finding:** Less than significant impact. (DEIR, p. 4.10-77.)

**Explanation:** Section 4.1-D4 provides a detailed discussion on the proposed Project's consistency with applicable habitat conservation plans or natural community conservation plans. To reiterate, the Project is subject to compliance with the Western Riverside MSHCP because the City is a Permittee to the MSHCP. The Project site is within the Cities of Riverside and Norco Area Plan of the MSHCP. However, the Project site is not within or adjacent to an MSHCP Criteria Cell, Core, or Linkages, or Public/Quasi Public lands. The proposed Project has no conservation requirements towards building out of the MSHCP Reserve. Since no Conservation Areas are near the Project site, compliance with Section 6.1.4 of the MSHCP is not needed. The Project site does not support any riparian/riverine resources, as defined by Volume 1, Section 6.1.2. of the MSHCP, that would be affected by the proposed Project, and is therefore compliant with Section 6.1.2 of the MSHCP. Additionally, the Project site is not within a Narrow Endemic Plants Survey Areas (NEPSSA) per Section 6.1.3 of the MSHCP; a Criteria Area Species Survey Areas (CASSA) for plant, bird, mammal, and amphibian species. Two locations covered by the SPA planning area contain survey requirements for the burrowing owl. Based on a burrowing owl habitat survey conducted for the two locations, the sites were determined to be unsuitable. The Project will participate in the MSHCP through the payment of the Local Development Mitigation Fee at the time building permits are issued pursuant to provisions of Ordinance No. 6709 of the City Municipal Code and Ordinance No. 810.2 of the County of Riverside. Impacts related to conflict with the MSHCP are less than significant, and no mitigation is required.

The Project site is within the Stephens Kangaroo Rat Habitat Conservation Plan (SKRHCP) fee boundary, but is not within a SKRHCP core reserve. Future construction under the CBUSP Amendment is subject to applicable per-acre mitigation fees levied by Riverside County pursuant to Ordinance No. 663. Payment of applicable regional, State and federal conservation, endangered and threatened species mitigation fees will ensure impacts related to conflict with conservation plans are less than significant. No mitigation is required. (DEIR, p. 4.10-77.)

## **K. MINERAL RESOURCES**

### **1. Known and Locally Important Resources**

**Threshold A:** Would the project 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?

**Finding:** No impact. (DEIR, p. 4.11-4.)

**Explanation:** The Project site is not located within a mineral resource area, and there are no known mineral resources on the Project site. The Project site has been previously graded, is fully developed with a university and associated facilities, and is completely surrounded by urban development. Therefore, implementation of the proposed Project would not result in the loss of identified regional or local mineral resources, conversion of an identified mineral resource use, or conflict with existing mineral resource extraction activities. The proposed Project would have no impact to known mineral resources of value or to a locally important mineral resource recovery site. No mitigation is required. (DEIR, p. 4.11-4.)

**Threshold B:** Would the project 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?

**Finding:** No impact. (DEIR, p. 4.11-4.)

**Explanation:** There are no specific areas within the City or its Sphere of Influence designated locally-important mineral resource recovery sites. The Project site is not located within a mineral resource area. The Project site has been previously graded, is fully developed with a university and associated facilities, and is completely surrounded by urban development. Therefore, the proposed Project would not result in a loss of availability of a locally important mineral resource recovery site delineated on a local general plan or specific plan. No impacts would occur. No mitigation is required. (DEIR, p. 4.11-4.)

## **L. NOISE**

### **1. Airport Noise**

**Threshold E:** Would the project be located within the vicinity of a private airstrip, and expose people residing or working in the project area to excessive noise levels?

**Finding:** Less than significant impact. (DEIR, p. 4.12-35.)

**Explanation:** Airport related noise levels are primarily associated with aircraft engine noise made while aircraft are taking off, landing, or running their engines while still on the ground. The closest airport to the Project is Riverside Municipal Airport located approximately 1.3 miles north of the Project. Although aircraft noise is occasionally audible within the Project site, no portion of the Project lies within the 55 dBA CNEL noise contours of the Riverside Municipal Airport. Impacts would be less than significant. No mitigation is required. (DEIR, p. 4.12-35.)

**Threshold F:** Would the project be located within the vicinity of a private airstrip, and expose people residing or working in the project area to excessive noise levels?

**Finding:** No impact. (DEIR, p. 4.12-35.)

**Explanation:** The Project site is not in the vicinity of any private airstrip, so implementation of the Project would not expose people residing or working in the project area to excessive noise levels generated by a private airstrip. No impact would occur, and no mitigation is required. (DEIR, p. 4.12-35.)

## **M. POPULATION AND HOUSING**

### **1. Substantial Growth and Displacement**

**Threshold A:** Would the project 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)?

**Finding:** Less than significant impact. (DEIR, pp. 4.13-5 – 4.13-8.)

**Explanation:** The University has experienced and is planning for a substantial increase in its enrollment. The University's student population consists of three student categories: traditional students, graduate students, and online students. (DEIR, p. 4.13-6.)

Construction of the Project would require the participation of construction employees from the regional construction work force. This work force moves from project to project as work is completed; therefore, these workers would not typically relocate during specific projects. In the absence of a significant relocation of workers during construction, no short-term increase in population would occur. (DEIR, p. 4.13-6.)

The University anticipates an enrollment goal of 12,000 students (7,201 *traditional* students) in 2025. Based on a student to faculty/staff ratio of 11.11, the projected enrollment would require an increase in faculty/staff positions from 757 positions in 2015 to 1,080 positions by 2025, a potential increase of up to 323 jobs in the City. (DEIR, p. 4.13-7.)

University policy dictates that every student enrolled or receiving a specified level of financial aid from the University must live on campus until reaching the age of 21. Of the projected 2025 enrollment of 12,000, 7,201 students are anticipated to be *traditional* students. The University's goal is to provide a bed-to-student ratio of 0.55 for *traditional* students. Based on this ratio, project future enrollment within this student category would require 3,961 beds. Currently, 2,861 beds are provided; therefore, an additional 1,110 beds are required to accommodate future increases in the

number of *traditional* students. Current student housing options consist of studio apartments, one-bedroom apartments, two-bedroom apartments, and townhomes with an occupancy ranging from two to five students with an average occupancy of 3.375 students per housing unit. Although CBU calculates on campus housing demand based on beds as opposed to units, student enrollment increases that may result from implementation of proposed Project may require up to 326 additional student housing units by 2025.

As shown in Table 4.13.B of the EIR, the jobs-to-housing ratios for the City, County, and SCAG region are 1.30, 0.89, and 1.25, respectively. This data suggests the City trends towards a slightly more “jobs rich” scenario compared to the County and the SCAG region. Based on population, employment and housing forecasts, this trend will continue through 2040. Implementation of the proposed project could add up to 323 jobs and 1,110 additional student beds to the City by 2025. The potential increase in staff/faculty positions and student housing would not affect the City’s existing or forecast job/housing ratio. (DEIR, p. 4.13-7.)

The Project area is located within an area served by existing roadway and utility infrastructure; therefore, the Project does not include the extension of roadway or utility features that would contribute to new or unplanned growth. It is not certain if future enrollment will increase the population of the City. If students already live locally, they would be included in the existing SCAG growth forecasts. In the unlikely event all new students originate from outside the City, the forecast enrollment could increase the City’s population by 3,578 persons (a 1.0 percent over 2017 estimates) Any increase in population resulting from development pursuant to the CBUSP is consistent with existing and future population forecasts and would not significantly (either directly or indirectly) population growth in the City or region; therefore, the impacts will be less than significant both directly and indirectly. No mitigation is required. (DEIR, p. 4.13-8.)

**Threshold B:** Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

**Finding:** Less than significant impact. (DEIR, p. 4.13-8.)

**Explanation:** The goal of the proposed Project is to accommodate a 30 percent increase in student enrollment at CBU by 2025. This increased enrollment (3,586 students) will require the development of new academic, administrative, housing, parking, and recreational facilities. Approximately 400,000 square feet of building area for administrative, academic, student housing, and recreational purposes is anticipated to accommodate future enrollment.

Current student housing options consist of studio apartments, one-bedroom apartments, two-bedroom apartments, and townhomes with an occupancy ranging from two to five students with an average occupancy of 3.375 students per housing unit. The demolition of existing student housing could occur due to development of academic and administrative facilities, parking, and/or student recreational amenities. Conversely, existing non-residential facilities and features could be vacated, repurposed and/or demolished to accommodate future student housing. As needed, additional student housing will largely be provided through the acquisition of off-site residential properties.

The precise location, extent and number of residential units displaced (if any) by future on-campus development are not known at this time. While implementation of the proposed Project could result in future displacement of existing (student) housing, these units would be replaced by additional on- and/or off-campus residential units to accommodate the enrollment of 7,201 traditional students forecast for 2025. A less than significant impact would occur related to the displacement of existing housing. No mitigation is required. (DEIR, p. 4.13-8.)

**Threshold C:** Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

**Finding:** Less than significant impact. (DEIR, p. 4.13-8.)

**Explanation:** Existing campus housing serves the needs of current and future students. Student occupancy of on-campus housing is generally of limited duration. While the demolition of existing student housing and the occupants of said units could occur due to development of campus improvements, whether or not residential displacement actually occurs is dependent upon factors such as location and timing (in-session vs out-of-session).

The precise location, extent and number of residential units displaced (if any) by future on-campus development are not known at this time. While implementation of the proposed Project could result in future displacement of existing (student) housing and the occupants of said units, additional on- and/or off-campus residential units would be developed (or acquired) to accommodate the enrollment of 7,201 traditional students forecast for 2025. A less than significant impact would occur related to the displacement of persons. No mitigation is required. (DEIR, p. 4.13-8.)

## **N. PUBLIC SERVICES**

### **1. Governmental Facilities**

**Threshold A:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance?

**Finding:** Less than significant impact. (DEIR, pp. 4.14-11 – 4.14-12.)

**Explanation:** The Project will directly induce population growth that was not considered under the City's General Plan 2025. However, adequate police facilities and services are provided by the Central Neighborhood Policing Center (Magnolia Station) located at 10540 Magnolia Avenue to serve this Project. In addition to the RPD, the CBU Department of Safety Services (DSS) assists with the protection of students, employees, and property.

DSS officers employed by CBU are non-sworn security officers and derive their enforcement powers under Section 837 of the California Penal Code. DSS consists of a full-time staff including a director, assistant director, department supervisors, officers, dispatchers and support staff, augmented by part-time student workers who perform less critical tasks. DSS's jurisdiction extends only to CBU owned/leased property boundaries, including those of extension campuses and non-campus properties, and off-campus University events, so safety services provided by DSS

is not adversely affected by the non-CBU population. As the CBU population grows, so too does the DSS to maintain service ratios and enhance the safety and security of the CBU community. CBU certifies that it has established a campus security policy, is carrying out that policy, and meets the disclosure requirements of Title IV of the Higher Education Act of 1965 regarding campus security policies and crime statistics.

The Project will not result in significant intensification of land use, and it will not generate the construction of new or expansion of existing police protection facilities from an increase in the demand for police facilities or services. Through the safety services provided by the DSS, City General Plan 2025 policies, compliance with existing codes and standards, and through Police Department practices, there will be less than significant impacts on the demand for additional police facilities or services. Therefore, no mitigation is required. (DEIR, p. 4.14-12.)

**Threshold B:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance?

**Finding:** Less than significant impact. (DEIR, pp. 4.14-12 – 4.14-13.)

**Explanation:** The Project will directly induce population growth that was not considered under the City's General Plan 2025. However, adequate fire facilities and services are provided by Station 10 located at 2590 Jefferson Street and Station 2 located at 9450 Andrew Street to serve this Project. The Project will not result in the intensification of land use, and it will not generate the construction of new or expansion of existing fire service facilities from the increase in the demand for fire facilities or services. According to CBU's 2016 Annual Report of Fire Information and Statistics, only one (1) fire was reported on the CBU campus in three years between 2014 and 2016. The nature of the fire was food left on the stove, and there were no reported injuries or deaths.

CBU has several types of residential housing available to students, and fire safety systems are installed through the DSS based upon the type of construction pursuant to applicable provisions of the CBC. Additionally, DSS strictly regulates the use of portable electrical devices, smoking and open flames in student housing areas. These regulations are distributed to students in the Student Handbook and/or written agreements relating to use of student housing, reviewed with residential students through community meetings where attendance is mandatory, and enforced through regular inspection of premises by Resident Life staff members. DSS disseminates fire safety and training programs to students, faculty, and staff through different forums depending upon the audience, and regularly conducts fire drills to ensure the health and safety of all students and staff, which further reduces demand on fire protection services. Finally, DSS continually reviews fire safety planning, education, and systems and, in consultation with local fire officials, determines necessary improvements by establishing and supporting policies and procedures, and implementing change as appropriate. Through the safety services provided by the DSS, City General Plan 2025 policies, compliance with existing codes and standards, and through Fire Department practices, there will be less than significant impacts on the demand for additional fire facilities or services. No mitigation is required. (DEIR, p. 4.14-13.)

**Threshold C:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance?

**Finding:** No impact. (DEIR, p. 4.14-13.)

**Explanation:** Although the Project proposes residential uses, all the future housing units within the Project site will be student housing and will not include the addition of any housing units that would increase numbers of school age children; therefore, the Project will not generate demand for additional school facilities (Grades K-12). No impact on the demand for additional school facilities will occur. No mitigation is required. (DEIR, p. 4.14-13.)

**Threshold D:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance?

**Finding:** Less than significant impact. (DEIR, p. 4.14-13.)

**Explanation:** Although the Project proposes residential uses, all the future housing units within the CBUSP will be student housing and will not involve the addition of any housing units that would increase demand for libraries given that CBU currently provides such facilities for students. Further, CBU will continue to provide libraries through the build out of the Specific Plan. Therefore, there will be less than significant impacts on the demand for additional library facilities or services. No mitigation is required. (DEIR, p. 4.14-13.)

**Threshold E:** Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, need for new or physically altered public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance?

**Finding:** Less than significant impact. (DEIR, p. 4.14-14.)

**Explanation:** Although the Project proposes student housing to accommodate the increase in students over a 10-year period, the Project will not involve the addition of any housing units that would increase demand for other public facilities such as community centers given that CBU currently provides such facilities for students. Further, CBU will continue to provide these types of facilities through the build out of the Specific Plan. Therefore, there will be less than significant impacts on the demand for other public facilities or services provided by public community centers. No mitigation is required. (DEIR, p. 4.14-14.)



## **O. RECREATION**

### **1. Existing and New Facilities**

**Threshold 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?

**Finding:** Less than significant impact. (DEIR, p. 4.15-11.)

**Explanation:** Although the Project proposes an increase in student enrollment, any increase in population would be students that would be served by the existing CBU recreation and open space facilities, as well as additional recreation and open space facilities proposed pursuant to the Project. The proposed Project establishes a comprehensive development program for additional recreation and open space facilities to accommodate the anticipated increase in student enrollment. Additionally, the Project's implementation methods serve as self-mitigating project design features required for all subsequent development and improvement projects to or in proximity to recreation and open space resources.

In accordance with the City's Parks, Recreation, and Community Services-Park Planning Division, all subsequent development projects are required to pay Local Park Development Fees, Regional Parks and Reserve Park Development Fees, and Trails Development Fees pursuant to Chapters 16.60, 16.44, and 16.76 of the RMC, respectively, in order to ensure that adequate park and recreation facilities are available for all residents before issuance of building permits. Through the payment of these fees, the Project's fair-share contribution towards the funds needed to construct additional maintenance facilities, parks and other recreational facilities is fulfilled. Furthermore, since an increase in population from the proposed Project would be partially served by the existing CBU recreation and open space facilities, as well as additional recreation and open space facilities proposed pursuant to the Project, the Project will not involve an increase in population that would significantly increase demand for existing neighborhood and regional parks or other recreation facilities. Impacts would be less than significant. No mitigation is required. (DEIR, p. 4.15-11.)

**Threshold 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?

**Finding:** Less than significant impact. (DEIR, pp. 4.15-11 – 4.15-14.)

**Explanation:** The proposed Project establishes programmatic development standards and design guidelines against which to review new development to ensure it does not result in significant impacts from the use and/or construction of recreation and parks resources. Proposed improvements to existing athletic facilities include enhanced stadium seating capacity for baseball, softball, and soccer fields, up to 3,000, 2,000, and 3,000 spectators, respectively, as well as upgrades to the aquatic facility such as pool upgrades, bleacher improvements, and enhanced concession facilities.

Athletic open space will provide for athletic fields appropriate to the competitive division of college athletics with which CBU is affiliated. Various upgrades to athletic facilities will be

required to accommodate an increase in the number of spectators at sporting events, as well as satisfy NCAA Division I standards.

CBU's open space network consists of the Magnolia Lawn, Stamps Courtyard, Harden Square, the athletic fields, and a network of smaller courtyards, plazas, and lawns that surround and are incorporated into the student housing areas. The water quality basin along Magnolia Avenue is a depression of mowed grassy lawn accessible by the student-body for strolls, picnics, ball and Frisbee games, etc. Together these areas comprise the recreation and parks resources within the Project. The open space and recreation plan will ensure students have a place for relaxation, recreation, contemplation, and gathering and will contribute to the ambiance and character of the campus. Land use regulations and development standards (Chapter 4), design guidelines (Chapter 7), and implementation methods (Chapter 8) of the CBUSP Amendment would ensure CBU's open space network is maintained as a distinguished and functional component of CBU. CBU may modify internal open space areas and balconies of residential apartment complexes that would be transitioned to traditional student residences, which could include reducing individual open space areas, in order to reflect a development character more suitable to student life. Any loss of such open spaces within the residential complexes would be partially offset by students' access to the common open space on the campus.

As detailed in the discussion of Section 4.1 O 1A above, recreational and park facilities are proposed to partially accommodate the increase in demand on recreational and park facilities from the proposed student growth within the Project, and all subsequent development projects are required to pay Local Park Development Fees, Regional Parks and Reserve Park Development Fees, and Trails Development Fees to ensure the Project's fair share contribution towards the funds needed to construct additional recreational and park facilities is fulfilled. Through the provision of onsite recreational and park facilities and payment of related City fees, the increase in demand on recreational and park facilities from population growth on campus will not result in a significant impact to existing City owned parks and recreational facilities.

Development standards of the Project are intended to accommodate recreation and intramural activities at open space areas throughout the campus, as determined by the campus intramural and athletic department's needs. Additional plazas will be located in the interior portion of campus to create a strong campus identity. Landscape plans will meet the landscaping requirements described in the design guidelines (Chapter 7) of the CBUSP Amendment and will be reviewed by the City at the time of Site Plan and Design Review (as applicable) and will be consistent with the Open Space Guidelines of the CBUSP. Together, the development standards and design guidelines of the CBUSP Amendment would ensure CBU's open space network is preserved and enhanced throughout implementation of the CBUSP.

Construction of athletic facilities, recreation areas, open space, courtyards, and plazas, as well as amphitheaters, performing art theatres, and events centers with a seating capacity up to 2,499 within the Project shall be permitted by right. Amphitheaters, performing art theatres, and events centers with a seating capacity of 2,500 or more shall be conditionally permitted subject to the granting of a Minor Conditional Use Permit and pursuant to Chapter 19.730 of RMC Title 19 (Zoning) to adequately address any potential negative environmental impacts associated with the construction and operation of such venues within the Project.

All development permitted as a matter of right shall be subject to Administrative Design Review in accordance with the Project's implementation mechanisms; specific minor improvements shall be exempt from further review. For any use for which a Minor Conditional Use Permit is required, the application for and processing of such permit shall comply with Chapter 19.730 of RMC Title 19 (Zoning), except that Section 19.730.030 (Applicability and Permit Requirement) shall not apply. For temporary uses that require additional City permits (e.g., health, fire, electrical) but that function to carry out the CBU's mission, such as commencement activities, a temporary use permit would be obtained. Non-classified uses may be permitted, subject to determination by the City's Director of Community and Economic Development that the proposed non-classified use is similar to an allowed use.

All future development resulting from the Project would be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the CBUSP Amendment, the City's General Plan 2025, and applicable provisions of the RMC. Future development projects will be required to pay development impact fees, including the Local Park Development Fees, Regional Parks and Reserve Park Development Fees, and Trails Development Fees pursuant to Chapters 16.60, 16.44, and 16.76 of the RMC, respectively. Additionally, since any recreational facilities proposed as part of the Project would be constructed within the Project footprint already analyzed throughout this EIR and mitigated as applicable, impacts related to the provision of new recreational facilities or expansion of existing recreational facilities would be less than significant, and no mitigation is required. (DEIR, p. 4.15-14.)

## **P. TRANSPORTATION/TRAFFIC**

### **1. Air Traffic Patterns**

**Threshold C:** Would the project 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?

**Finding:** Less than significant impact. (DEIR, pp. 4.16-29 – 4.16-30.)

**Explanation:** The Project is located approximately one mile south of the Riverside Municipal Airport. The Project is consistent with the Riverside Municipal Airport Land Use Compatibility Plan (LUCP). The northeastern corner of the Project lies within Zone D (Primary Traffic Patterns and Runway Buffer Area) of the LUCP, with the remainder of the Project located in Zone E (Other Airport Environs).

In Zone D, any development over 70 feet tall will be subject to airspace review by the Riverside County Airport Commission (RCALUC), and highly noise-sensitive outdoor nonresidential and hazards to flight uses are prohibited. The residential density criteria for that portion of Zone D at Riverside Municipal Airport lying within the boundary of the City of Riverside is established to enable the density of future development to be similar to what now is common in the area. Additionally, schools, hospitals, and nursing homes are discouraged within Zone D. In Zone E, any development over 100 feet tall will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.

The Project incorporates development standards designed to maintain compliance with the RCALUCP compatibility strategies for the Riverside Municipal Airport. Generally, building placement and massing will occur along primary interior circulation routes. Taller buildings and structures will be placed at the center of the core campus area. Buildings will step down in height toward the campus edges and in particular, buildings along the edges will be of a scale and mass that are compatible with buildings on adjacent non-CBU properties.

Per California Public Utilities Code Section 21676, “prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission.” Light standards generally shall be a maximum height of 99 feet. However, higher standards may be installed as required for specific needs, subject to review by the RCALUC for compliance with the Riverside County ALUCP.

Although the proposed Project is located within an Airport Lane Use Compatibility Plan, it will not result in a change in air traffic patterns, including either an increase in air traffic levels and/or a change in the location that results in substantial safety risks. Impacts are considered to be less than significant. No mitigation is required. (DEIR, p. 4.16-30.)

## **2. Traffic Hazards**

**Threshold D:** Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

**Finding:** Less than significant impact. (DEIR, pp. 4.16-30 – 4.16-31.)

**Explanation:** The design of roadways must provide adequate sight distance and traffic control measures. This provision is normally realized through roadway design to facilitate roadway traffic flows. The project would introduce an additional 3,000 students by 2025. To accommodate this growth, the Project would improve the internal circulation system on the core campus.

The design of these future circulation system improvements would not include any sharp curves or dangerous intersections. Roadway improvements in and around the project site would be designed and constructed to satisfy all City requirements for street widths, corner radii, intersection control, site access requirements, and internal circulation. As part of the City’s standard plan check process, the final design of all roadways, intersections, and circulation within and adjacent to the project site would be reviewed by and subject to approval by City staff prior to issuance of any applicable grading, construction, or occupancy permit, which would preclude uses that are incompatible with existing on-site or adjacent development. The review and approval by City staff sufficiently ensures the project will incorporate the necessary design features to provide safe travel to, from, and within the project site. For these reasons, the proposed Project will not substantially increased hazards due to a design feature or incompatible uses, and impacts are considered to be less than significant. No mitigation is required. (DEIR, p. 4.16-31.)

## **3. Emergency Access**

**Threshold E:** Would the Project result in inadequate emergency access?

Finding: Less than significant impact. (DEIR, p. 4.16-31.)

Explanation: Generally the Project site and surrounding area have several fully improved roadways and State Route 91 (SR-91) south of the site, which provide full emergency access to the project site. Future improvements resulting from the proposed Project would be designed, constructed, and maintained in accordance with typical standards to provide for adequate emergency access and evacuation. Construction activities, which may temporarily restrict vehicular traffic, would be required to implement measures to facilitate the passage of persons and vehicles through/around any required road closures. Future development phases resulting from the proposed Project would be submitted to and approved by the City's Fire and Police Departments prior the issuance of building permits. The proposed Project will not result in inadequate emergency access. Therefore, a less than significant impact would occur. No mitigation is required. (DEIR, p. 4.16-31.)

#### **4. Alternative Transportation**

**Threshold F:** Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Finding: Less than significant impact. (DEIR, pp. 4.16-31 – 4.16-32.)

Explanation: The proposed Project area would have accessibility via public transit. The RTA currently provides bus service to the project area; Route 1 and RapidLink runs along Magnolia Avenue just north of the project site. Route 1 services CBU directly and has many transfer points along the route, including the Galleria at Tyler shopping center. RTA also runs Route 14 along Indiana Avenue that parallels Route 1. As identified in Chapter 5 of the CBUSP Amendment, “benches should be placed individually or in groups at bus stops, along active pedestrian ways, in plazas, and at key pedestrian crosswalks.” Surrounding the Project are existing Class 2 bicycle facilities. The following bus stops are located on Magnolia Avenue:

- Magnolia Avenue/Monroe Street;
- Magnolia Avenue/Melody Lane;
- Magnolia Avenue and Adams Street.

The proposed project would be required to adhere to applicable city standards that support and/or facilitate alternative modes of transportation. The project will not alter the location or frequency of bus transportation in the project area. The proposed project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise cause a decrease in the performance or safety of such facilities. Therefore, impacts to alternative transportation are considered less than significant. No mitigation is required. (DEIR, p. 4.16-32.)

## **Q. UTILITIES AND SERVICE SYSTEMS**

### **1. Water and Wastewater Treatment and Facilities**

**Threshold A:** Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

**Finding:** Less than significant impact. (DEIR, p. 4.18-18 – 4.18-19.)

**Explanation:** Riverside Public Utilities (RPU) and the Riverside Public Works Department (RPW) conjointly manage and plan wastewater and recycled water operations and programs. It is anticipated that all additional wastewater generated by the proposed Project would be routed and treated at the Riverside Water Quality Control Plant (RWQCP), located at 5950 Acorn Street approximately 2.3 miles northwest of the CBU campus. Operational discharge flow treatment would be required to comply with waste discharge requirements contained within the waste discharge requirements for that facility. At the RWQCP, wastewater is made clean and safe through tertiary treatment before it is reused for irrigation or discharged into the Santa Ana River.

The RWQCP has a max design capacity of 46 million gallons per day (mgd), is currently treating approximately 27.2 mgd, and therefore has an approximately 18.8 mgd of capacity surplus. Compliance with condition or permit requirements established by the City and waste discharge requirements at the RPW would ensure that discharges into the wastewater treatment facility system from the operation of the proposed Project would not exceed applicable wastewater treatment requirements. Expected wastewater flows from the proposed Project will not exceed the capabilities of the serving treatment plant; therefore, the proposed Project will have a less than significant impact on a wastewater treatment plant. No mitigation is required. (DEIR, p. 4.18-19.)

**Threshold B:** Would the Project 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?

**Finding:** Less than significant impact. (DEIR, pp. 4.18-19 – 4.18-23.)

**Explanation - Water Supply Facilities:** RPU's water supply consists primarily of groundwater from the Bunker Hill Basin, Rialto-Colton, Arlington, Riverside North, and Riverside South sub-basins and is conveyed to RPU's potable or non-potable distribution system. The western portion of the Project is within the Arlington water basin while the remainder of the Project is within the Riverside south water basin. RPU's pumping capacity totals approximately 46,540 gallons per minute (gpm) with individual well production ranging from approximately 746 gpm to 33,330 gpm. The pumping capacity for each basin is as follows:

- Bunker Hill: 33,330 gdm
- Riverside South: 8,408 gdm
- Riverside North: 3,938 gpm
- Rialto-Colton Basin: 746 gpm

New development associated with the proposed Project will need to connect to existing water lines as well as new water lines to be built as building occurs, ensuring that water services to the future development is provided. Proposed infrastructure improvement would require approval from the RPU.

New development associated with the proposed Project will not require the construction of new or expanded water service facilities at off site locations. As a result, the installation of water facilities during future Project construction phase would not create a significant environmental effect that are not already identified and disclosed as part of the EIR prepared for the proposed Project.

CBU's non-potable water needs are partially met by two on-site wells, and additional non-potable and all potable water needs are met by City supplies. CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields. Potable water is provided to CBU by City supplies.

CBU water demand totaled 6,850,700 cubic feet (157.27 acre-feet) from November 2016 through July 2017. Projected over a 12-month period, CBU's current annual demand is approximately 9,134,267 cubic feet (209.70 acre-feet) (68,329,062 gallons) of water per year assuming a current student enrollment of 8,773. The projected increase in student enrollment of 3,227 would generate an additional 3,358,471 cubic feet (77.1 acre-feet) (25,123,108 gallons) of water per year, or 9,201.3 cubic feet (68,830.5 gallons) of water per day. Combined with existing demand, CBU is expected to demand 12,492,738 cubic feet (286.80 acre-feet) (93,452,170 gallons) of water per year at buildout of the Project.

RPU would have a reliable and sufficient water supply that would exceed projected demand through the year 2040. RPU and the RPW conjointly manage and plan wastewater and recycled water operations and programs, and the anticipated Project water demand of 25,123,108 gallons of water per year, or 68,830.5 gallons of water per day would constitute potable water to be used for both drinking as well as sanitary needs resulting in wastewater. As a worst case scenario, even if all anticipated water demand were used for sanitary needs resulting in wastewater, the proposed project would generate an additional 68,830.5 gallons of wastewater per day.

Explanation - Wastewater Facilities: The RWQCP maintains a surplus wastewater treatment capacity of 18.8 mgd, so the Project would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, which could cause significant environmental effects.

The Project proposes the abandonment of the existing private sewer distribution line that runs under the East Parking Structure and replacement with an 8 inch sewer distribution line.

A Sewer Capacity Study was prepared for the proposed Project. The study estimated wastewater flows from the proposed Project's increase to 12,000 students and associated 400,000 square feet of growth in building area in year 2025. Estimated flows were calculated for both daytime peak conditions and evening peak conditions. Key findings from the Sewer Capacity Study are as follows:

*Carney Lane to Monroe Street*

- The anticipated 2025 peak daytime sewer flows in Carney Lane's sewer are generated by the Events Center and minor daytime uses in Lancer Arms, Smith Hall/Simmons Hall, and the proposed 1,000 beds South Campus Housing development and is approximately 307 gpm.
- The anticipated 2025 peak evening sewer flows in Carney Lane's sewer are generated by the Events Center and student housing complexes that include Lancer Arms, Smith Hall, Simmons Hall, and the proposed 1,000 beds South Campus Housing development and is approximately 475 gpm.
- The capacity of the existing 10-inch sewer at 0.4% slope in Carney Lane at Monroe Street is calculated to be 506 gpm.

In summary, the existing 10 inch Carney Lane sewer is adequate for the proposed 2025 peak sewer flows.

#### *Campus Bridge Drive to Magnolia Avenue*

- The anticipated 2025 peak daytime sewer flows in Campus Bridge Drive's sewer are generated by mainly academic/administrative uses and is approximately 265 gpm.
- The anticipated 2025 peak evening sewer flows in Campus Bridge Drive's sewer are generated by academic/administrative uses and the Cottages student housing complex and is approximately 109 gpm.
- The capacity of the existing 8-inch sewer at 0.4% slope in Campus Bridge Drive at Magnolia Avenue is calculated to be 338 gpm.

In summary, the existing 8 inch Campus Bridge Drive sewer is adequate for the proposed 2025 peak sewer flows.

#### *Miscellaneous Other Campus Sewer Outflows*

- Adams Street – Tower Hall student housing 4 gpm daytime, 30 gpm evening.
- Adams St – The Village student housing 4 gpm daytime, 33 gpm evening.
- Adams St – The Point student housing 4 gpm daytime, 24 gpm evening.
- Adams St – School of Nursing 20 gpm daytime, negligible evening.
- Adams St – 3739 Adams St 20 gpm daytime, negligible evening.
- Adams St – School of Nursing 20 gpm daytime, negligible evening.
- Magnolia Ave – University Place (UP's) student housing 4 gpm daytime, 44 gpm evening.



- Magnolia Ave – The Colony student housing 11 gpm daytime, 116 gpm evening.
- Monroe St – Health Science Campus 45 gpm daytime, gpm GPM evening.

As summarized above, the findings from the Sewer Capacity Study prepared for the proposed Project confirm that adequate capacity exists in all trunk lines to accommodate transmission demands associated with build-out of the CBUSP. The study also confirmed that the sewer distribution plan summarized in Section 4.18-4 of the EIR, including the new sewer distribution line, would adequately convey flows to the trunk lines and no other expanded or new sewer facilities would be required.

All necessary wastewater distribution facilities would be installed simultaneously with required roadway frontage improvements for the proposed Project. Therefore, the connection to the existing delivery systems would not result in substantial disturbance of existing roadways or water facilities.

**Conclusion – Water and Wastewater Facilities:** Adherence to standard requirements identified by RPU, RPW, and the City associated with the design and installation of new water and wastewater infrastructure would ensure that no significant impacts would result from the construction or operation of the proposed Project, and no additional or expanded water treatment facilities would be required to serve the proposed Project. Therefore, the proposed Project would have a less than significant impact related to the need to construct new or expand water and wastewater facilities. No mitigation is required. (DEIR, p. 4.18-23.)

**Threshold E:** Would the Project 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?

**Finding:** Less than significant impact. (DEIR, pp. 4.18-26 - 4.18-27.)

**Explanation:** RPW operates a comprehensive wastewater collection, treatment and disposal system that serves most of the City. The proposed Project wastewater would be treated at the RWQCP located at 5950 Acorn Street approximately 2.3 miles northwest of the proposed Project site. RWQCP treated almost 33 mgd of sewage for 280,000 residents of Riverside and other communities. As stated previously, RPU and the RPW conjointly manage and plan wastewater and recycled water operations and programs, and the anticipated additional water demand of 25,123,108 gallons of water per year, or 68,830.5 gallons of water per day would constitute potable water to be used for both drinking as well as sanitary needs resulting in wastewater. As a worst case scenario, even if all anticipated water demand were used for sanitary needs resulting in wastewater, the proposed project would generate an additional 68,830.5 gallons of wastewater per day.

The sewage treatment capacity for the RWQCP is 46 million gpd. The plant treats an average influent wastewater flow of approximately 27.2 million gpd, leaving a surplus capacity of approximately 18.8 million gpd. The proposed Project site would increase wastewater at the RWQCP by 0.25 percent, incrementally increasing demand for wastewater treatment. Therefore,

the proposed Project would have a less than significant impact to wastewater treatment. No mitigation is required. (DEIR, p. 4.18-27.)

## **2. Storm Water Drainage Facilities**

**Threshold C:** Would the project require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

**Finding:** Less than significant impact. (DEIR, pp. 4.18-23 - 4.18-25.)

**Explanation:** Storm water runoff from the site ultimately flows into regional storm drain facilities managed by the Riverside County Flood Control and Water Conservation District. The three mainline drainage facilities that serve the area include:

- Monroe Storm Drain Stage I Line
- 30-inch storm drain in Magnolia Avenue
- 20-inch storm drain northwest of Diana Avenue

The Monroe Storm Drain Stage I Line begins approximately 400 feet south of Indiana Avenue and ranges from 60- to 63- inch reinforced concrete pipe in Monroe Street before upsizing to an eight-foot concrete box culvert at Magnolia Avenue, then ultimately draining northwesterly to the Monroe Street Channel. The majority of campus runoff is conveyed via on-campus storm drain systems to the existing detention basin (Magnolia Basin) located west of Campus Bridge Drive along Magnolia Avenue. All future flows resulting from implementation of the proposed Project would be directed to the existing Magnolia Basin. University owned storm drain facilities on the campus range in size from 6 to 42 inches.

The second drainage area captures runoff from areas along Monroe Street, Wilma Court, and Emily Court. Runoff from Diana Avenue and residential homes along Wilma and Emily Courts drains into the existing 20-inch storm drain facility in Diana Avenue and into the Monroe Storm Drain Stage I Line.

The third drainage area is adjacent to Adams Street, between Diana and Magnolia Avenues. Runoff from this area drains as flow to Adam Street and Magnolia Avenue, then ultimately draining to the Monroe Street Channel.

As new development occurs, localized storm drains will be constructed and connected to existing storm drain systems that flow to the on-site basin (see Figures 2-7 and 4.9-1). The existing drainage patterns will be maintained throughout the campus to reduce the potential for diversion of flows. The existing 30-inch storm drain along Lancer Lane will be extended to provide drainage facilities for the realigned primary vehicular roadway.

The Hydrology Study prepared for the proposed Project examined future storm water flows attributable to the proposed Project. All future flows resulting from implementation of the proposed Project would be directed to the existing Magnolia Basin. Existing drainage patterns

would be respected throughout the campus to reduce the potential of diversion of flows. The future flows to the basin estimated for year 2025 are 73.22 cfs in the 10-year storm event and 125.87 cfs in the 100-year storm event. The net increase in flow to the basin is 2.52 cfs in the 10-year storm event, and 4.29 cfs in the 100-year storm event. The existing basin decreases the 10-year storm flow to all downstream conveyances by detaining approximately 38 cfs, while allowing 33.1 cfs to exit into the Magnolia Avenue storm drain. The 4.29 cfs increase for the 100-year future storm condition has minimal effect on all downstream conveyances, including the 30" Magnolia Avenue storm drain and the Magnolia Trapezoidal Channel.

Since the Project would not involve replacing pervious surfaces with impervious surfaces, but involves possible replacement of an existing impervious surface, such as a surface parking lot, the Project is not expected to cause a substantial change in the total surface runoff from the site. The existing on-site detention basin will continue to detain stormwater runoff down to pre-project conditions. The outlet structure connects to the existing 30-inch storm drain in Magnolia Avenue and drains to the existing Monroe Street Channel. Additional improvements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

CBU will reduce impacts on existing storm water infrastructure by treating and retaining or infiltrating runoff from campus. Where infiltration is not feasible due to natural conditions, storm water shall be treated to remove a minimum of 80 percent of total suspended solids prior to release in existing storm drain system, or as may be required to meet National Pollutant Discharge Elimination System (NPDES) requirements. These treatments can include, but not limited to bio-swales, bio-retention cells, rain gardens, native mixed grasses, pervious paving systems, packaged storm treatment units, and storm water infiltration systems. With implementation of the onsite storm water improvements described in the CBUSP Amendment, Project storm water flows would be accommodated without the need for new or expanded off site drainage facilities. For this reason, a less than significant impact related to storm water drainage would occur. No mitigation is required. (DEIR, p. 4.18-25.)

### **3. Water Supply**

**Threshold D:** Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

**Finding:** Less than significant impact. ((DEIR, pp. 4.18-25 - 4.18-26.)

**Explanation:** RPU's water supply consists primarily of groundwater from the Bunker Hill Basin, Riverside North, and Riverside South sub-basins. Additional sources of water available to RPU include groundwater from the Rialto-Colton Basin, recycled water from the Riverside Water Quality Control Plant (RWQCP), and RPU has the ability to purchase State Water Project water from Western Municipal Water District (WMWD) through a connection at the Metropolitan Water District of Southern California (MWD) Henry J. Mills Water Treatment Plant (WTP). Up to 30 cubic feet per second (cfs) or 19.4 million gallons per day (mgd) of imported water can be purchased from WMWD.

CBU owns and operates two on-site wells used for irrigation purposes only. The wells are equipped with 60-horsepower pumps with an approximate maximum capacity of 265 gpm. The size of the irrigation system pipes range from 0.5 to 6-inches in diameter. In addition, a 24-inch recycled water main will be available in Monroe Street. Riverside Municipal Code Chapter 14.28 (Mandatory Use of Recycled Water) dictates when non-potable water must be used. CBU will comply with these requirements, using City supplies to supplement its own well water.

CBU's water needs are currently met by two on-site wells and City supplies. CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields. Potable water is provided to CBU by City supplies. Based on water usage reported by RPU, CBU demanded 6,850,700 cubic feet (157.27 acre-feet) of water from November 2016 through July 2017. Projected over a 12-month period, CBU currently demands approximately 9,134,267 cubic feet (209.70 acre-feet) (68,329,062 gallons) of water per year assuming a current student enrollment of 8,773. Therefore, the projected increase in student enrollment of 3,227 would generate an additional 3,358,471 cubic feet (77.1 acre-feet) (25,123,108 gallons) of water per year, or 9,201.3 cubic feet (68,830.5 gallons) of water per day. Combined with existing demand, CBU is expected to demand 12,492,738 cubic feet (286.80 acre-feet) (93,452,170 gallons) of water per year at buildout of the proposed Project.

The RPU production capacity for 2040 is 124,703 AFY. The current total water demand (as of 2015) is 75,128 AFY. The proposed Project will add 77.1 AFY, increasing the demand to 75,205.1 AFY. The amount of water available for the Project is sufficient for normal, single-dry, and multiple-dry years over the next 23 years. Since planned supplies are sufficient, there is no need for new or expanded water supply entitlements. Therefore, the Project would have sufficient supplies from existing entitlements and would not require expansion; impacts to water supply are less than significant. No mitigation is required. (DEIR, p. 4.18-26.)

#### **4. Solid Waste**

**Threshold F:** Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

**Finding:** Less than significant impact. (DEIR, pp. 4.18-27 - 4.18-28.)

**Explanation:** The Project site is serviced by Burrtec Waste Industries for solid waste pickup and removal. Solid waste is transported to the Agua Mansa Landfill located at 1830 Agua Mansa Road in Colton. The Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day.

The Project is proposing an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structure with incidental office space by 2025. New construction resulting from implementation of the proposed Project would generate construction waste (e.g., concrete rubble, asphalt rubble, wood, drywall) that would result in an increased demand for solid waste collection and disposal landfill capacity.

As stated above, all non-hazardous solid waste generated from the Project site (such as plastic and glass bottles and jars, paper, newspaper, metal containers, and cardboard) would be recycled per local and state regulations mentioned above, in compliance with the California Integrated Waste Management Act. Remaining non-hazardous solid waste would be disposed of at the Agua Mansa

Landfill. Hazardous waste is managed and disposed of in compliance with all applicable federal, state, and local laws and is discussed in greater detail in Section 4.6 of the EIR. Public Resource Code (PRC) Section 41780 requires every city and county in the State to divert from landfills at least 50 percent of the quantity of waste generated within their jurisdiction in 2000. In 2004, the City's waste diversion rate was 60 percent, in compliance with PRC Section 41780.

In 2016, each resident had a disposal rate of 6.0 pounds per resident per day, with a recycling rate of 44 percent. For the 2016-2017 school year, approximately 8,773 students are attending the University. Assuming the rate of 6.0 pounds per resident per day, the University is currently generating 52,638 pounds per day or 192 million pounds per year. The additional 3,227 students and 190 faculty/staff would add an additional disposal rate of approximately 20,502 pounds or 10.3 tons per day. Assuming the Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day, the proposed project would demand approximately 0.0000076 percent of the Agua Mansa surplus capacity. Future development within the CBUSP Amendment would contribute to Development Impact Fees (DIF) to contribute funding for expansion of solid waste facilities. Therefore, the amount of solid waste generated and disposed of in the Agua Mansa Landfill during operation of the Project is expected to be within the permitted capacity of the landfill. The proposed Project would have a less than significant impact related to solid waste. No mitigation is required. (DEIR, p. 4.18-28.)

**Threshold G:** Would the project comply with federal, state and local statutes and regulations related to solid waste?

**Finding:** Less than significant impact. (DEIR, pp. 4.18-28 - 4.18-29.)

**Explanation:** Construction and operation of future development projects associated with implementation of the proposed Project would require compliance with state and local statutes and regulations related to solid waste generation, storage, and disposal, including the California Integrated Waste Management Act as amended and the City of Riverside Municipal Code, Title 6, Health and Sanitation. There are no federal regulations or statutes related to solid waste that apply to the Project. As noted above, during construction, all wastes will be recycled to the maximum extent possible. All non-hazardous solid waste generated from the Project site once operational (such as plastic and glass bottles and jars, paper, newspaper, metal containers, and cardboard) would be recycled, with a goal of 50%, in compliance with the Integrated Waste Management Act. The remaining non-hazardous solid waste would be disposed of at one of the County landfills (hazardous waste is managed and disposed of in compliance with all applicable federal, state, and local laws and is discussed in greater detail in Section 4.6.). CBU maintains recyclable waste receptacles throughout the campus that are collected by the waste hauler. In addition, all solid waste is processed through a Material Recovery Facility. Together, these processes assure compliance with state mandates to divert waste from the local landfill. Since the Project will comply with state and local statutes and regulations related to solid waste during construction and operation of all new development, impacts would be less than significant. No mitigation measures are required. (DEIR, p. 4.18-29.)

## **R. ENERGY USE/CONSERVATION**

### **1. Inefficient Energy Use**

**Threshold A:** Would the Project result in wasteful, inefficient, or unnecessary consumption of energy; conflict with existing energy standards and regulations; or place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity?

**Finding:** Less than significant impact. (DEIR, pp. 4.18-14 - 4.19-21.)

**Explanation:** Construction of future development projects associated with implementation of the proposed Project will require electricity and natural gas for the manufacture and transportation of building materials, preparation of the site, and construction of the buildings and infrastructure. The operational phase will require electricity for multiple purposes including, but not limited to, building heating and cooling, lighting, appliances, electronics, and specialized equipment.

The Project will promote building energy efficiency through compliance with energy efficiency standards (Title 24, CALGreen and Riverside's Green Action Plan) and the provision of energy efficiency measures that exceed required standards. The Project also reduces vehicle fuel usage due to compliance with regulatory programs and Project design features that reduce VMT. Executive Order S-01-07 went into effect in 2010 and requires a reduction in the carbon intensity of transportation fuels used in California by at least 10 percent by 2020. It imposes fuel requirements on fuel that will be sold in California that will decrease GHG emissions by reducing the full fuel-cycle and the carbon intensity of the transportation fuel pool in California. The Advanced Clean Cars program, introduced in 2012, combines the control of smog, soot causing pollutants and greenhouse gas emissions into a single coordinated package of requirements for model years 2017 through 2025.

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the previously referenced technical report (Appendix L of this DEIR). The Project's electrical consumption was estimated to be approximately 20,648,700 kWh (approximately 20.65 million kWh) of electricity per year and the natural gas consumptions was estimated to be approximately 61,365,400 thousand British thermal units (kBtus) per year or approximately 613,654 therms. RPU sold approximately 2,327,400 megawatt-Wh of electricity in 2016 and SCG produced approximately 5,123 million therms in 2016. At full build-out, the Project's electricity demand would be approximately 0.9 percent of the existing electricity in the City of Riverside and the natural gas demand would be approximately 0.01 percent of the existing natural gas use in SCG's service area.

Energy impacts associated with transportation during operation were also assessed using the traffic data contained in the technical study. Based on the annual VMT, gasoline and diesel consumption rates were calculated using the South Coast Air Quality Management District-specific miles per gallon in EMFAC2016. A total of 490,725 gallons of gasoline and 50,945 gallons of diesel fuel are estimated to be consumed each year by the proposed Project.

The proposed Project provides a framework to guide development of campus boundary and facility expansions. Environmental stewardship and energy conservation shall be emphasized in every new construction and reconstruction project. The Project proposes sustainability oriented design

guidelines exceeding the requirements of the California Green Building Standards Code (CALGreen) to be implemented as practical. Pursuant to the vision of the CBUSP Amendment, all future developments associated with implementation of the proposed Project and major renovations to CBU will incorporate energy conservation design that balances three often-competing interests: environmental concerns, economic constraints, and social equity. All future development activities will incorporate energy conservation design elements in accordance with the objectives, policies, and goals of the *Riverside Green Action Plan* and *Riverside General Plan 2025* (see EIR Table 4.19.B).

The proposed Project provides a framework to guide development of campus boundary and facility expansions. Environmental stewardship shall be emphasized in every new construction and reconstruction project. *Chapter 7: Design Guidelines, Section K. Sustainable Design*, of the CBUSP Specific Plan proposes sustainability oriented design guidelines exceeding the requirements of the California Green Building Standards Code (CALGreen) to be implemented as practical.

SCAG's 2016/2040 RTP/SCS actively encourages and creates incentives for energy efficiency to reduce energy costs, increase reliability and availability of electricity for the state, and reduce environmental impact. Additionally, the *Riverside Restorative Growth Print - Climate Action Plan* (RRG-CAP) includes energy measures designed to increase community-wide building and equipment efficiency and renewable energy use, and promote energy efficiency and renewable energy generation for use supporting municipal operations that support the community. The proposed Project is consistent with the City's *General Plan 2025* and SCAG's 2016 RTP/SCS for the purposes of encouraging and creating incentives for energy efficiency. Implementation of **MM-GHG-1** and **MM-GHG-2** will ensure energy efficiency in project design, construction and operation, resulting in Project consistency with the City's RRG-CAP.

All future developments and major renovations to CBU will incorporate sustainable design elements in accordance with the proposed Project CBU Specific Plan as summarized in EIR Table 4.19.B. The design features will result in the construction and operation of energy efficient administrative, academic, recreational, athletic buildings and facilities to meet the student growth envisioned by the Project. The Project also provides and promotes alternatives to vehicular modes of travel, which will reduce car trips and result in efficient alternative transportation choices. Given these considerations, the proposed Project will not contribute to wasteful, inefficient, or unnecessary consumption of energy; conflict with existing energy standards and regulations; or place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Impacts are considered less than significant. No additional mitigation is required.

## **4.2 Findings Regarding Less Than Significant Impacts After the Incorporation of Mitigation**

The City Council hereby finds that feasible Mitigation Measures have been identified in the EIR that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

## A. AIR QUALITY

### 1. Compliance with Air Quality Standards

**Threshold B:** Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

**Finding:** Less than significant with mitigation. (DEIR, p. 4.3-18 – 4.3-24.)

**Explanation:** The key assumptions used to estimate Project air pollution emissions during Project construction included the following:

- 49.57 acres of total land disturbance; and
- 4 acres maximum acres disturbed per day.

Key assumptions used to estimate Project air pollution emissions during Project operations included the following:

- 3,961 additional University/College students;
- 3,961 additional student dorms/beds;
- 400,000 square feet of additional building area (administrative, academic, housing, recreational) on 36.71 acres;
- 805,000 square feet of additional parking structures on 12.86 acres; and
- 5,291 additional trips per day.

#### *Regional Air Quality Impacts- Short-Term Construction*

Based on the estimates that were calculated for this Project, short-term construction emissions will not exceed any South Coast Air Quality Management District (SCAQMD) construction thresholds for any criteria pollutants with adherence to standard construction emission control measures. Incorporation of mitigation measures **MM AQ-1** through **MM AQ-7** will ensure these construction emission control measures will be implemented during construction to comply with SCAQMD construction requirements and avoid significant emissions during construction. Therefore, short-term construction regional air quality impacts are considered less than significant with mitigation incorporated. (DEIR, p 4.3-22.)

#### *Regional Air Quality Impacts- Short-Term Operational*

Long-term operational emissions will not exceed the SCAQMD thresholds with the incorporation of the proposed Project design features identified in the CBUSP Amendment, which are also included as mitigation measures **MM AQ-8** through **MM AQ-10**. Therefore, long-term operational regional air quality impacts are considered less than significant with mitigation incorporated. (DEIR, p 4.3-24.)



The following mitigation measures will be implemented:

**MM-AQ-1:** All project construction plans shall include a specification requiring the application of nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).

**MM-AQ-2:** All project construction plans shall include a specification requiring the watering of active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).

**MM-AQ-3:** All project construction plans shall include a specification requiring the covering of all haul trucks transporting dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

**MM-AQ-4:** All project construction plans shall include a specification requiring the paving of construction access roads at least 30 meters (100 feet) onto the site from the main road.

**MM-AQ-5:** All project construction plans shall include a specification limiting traffic speeds on all unpaved roads to 15 miles per hour or less.

**MM-AQ-6:** All project construction plans shall include a specification requiring the recycling or reuse of at least 50 percent of the construction material (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard).

**MM-AQ-7:** All project construction plans shall include a specification requiring the use of "green building materials" such as those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project, as specified on the CalRecycle website.

**MM-AQ-8:** Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:

- a) Increase insulation such that heat transfer and thermal bridging is minimized;
- b) Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and
- c) Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment.

**MM-AQ-9:** For each increment of future development, construction plans shall include efficient lighting and lighting control systems and architectural designs shall incorporate daylight as an integral part of the lighting systems in buildings.

**MM-AQ-10:** For each increment of future development, construction plans shall include a comprehensive water conservation strategy appropriate for the project and its location. The strategy may include the following, plus other innovative measures that may be appropriate:

- a) Create water-efficient landscapes within the development.
- b) Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- c) Use reclaimed water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water, if available.
- d) Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals.
- e) Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.

## **B. BIOLOGICAL RESOURCES**

### **1. Candidate, Sensitive, or Special Status Species and Habitats**

**Threshold A:** Would the project 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 Wildlife or U.S. Fish and Wildlife Service?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.4-12 – 4.4-14.)

**Explanation:** The vast majority of vegetation on the Project site consists of ornamental landscaping, and the Project area is fully developed with university and associated facilities and completely surrounded by urban development. Therefore, no suitable habitat exists for species identified as a candidate, sensitive, or special-status species occur on the Project site. A search of the MSHCP database and other appropriate databases identified no potential for candidate, sensitive, or special status species; suitable habitat for such species on site; Federal Species of Concern; California Species of Special Concern; and California Species Animal or Plants on lists 1-4 of the California Native Plant Society (CNPS) Inventory. However, trees and shrubs on site may provide nesting habitat for nesting birds. Therefore, future development on the Project site facilitated by implementation of the proposed Project may have direct and indirect effects to migratory birds. Direct effects may result from the removal and destruction of nesting bird habitat (e.g., trees and shrubs), and indirect effects may result from increased noise and human presence during construction activities that may cause birds to abandon nests or that may negatively affect nestlings.

Common native urban bird species that may nest in ornamental landscaping include lesser goldfinch (*Spinus psaltria*), Brewer's blackbird (*Euphagus cyanocephalus*), northern mockingbird (*Mimus polyglottos*), common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*),

Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), and hooded oriole (*Icterus cucullatus*). In addition, there is reasonable potential for existing and future buildings to support nesting opportunities for native birds that are common in urbanized areas, such as American kestrel (*Falco sparverius*), house finch (*Haemorhous mexicanus*), black phoebe (*Sayornis nigricans*), cliff swallow (*Petrochelidon pyrrhonota*), northern rough-winged swallow (*Stelgidopteryx serripennis*), and white-throated swift (*Aeronautes saxatalis*). A few species, primarily killdeer (*Charadrius vociferus*), may choose to nest on bare ground within the Project site.

Because portions of the Project site are within the MSHCP survey area for burrowing owl (BUOW), a biological resource assessment was prepared for the Project (see Figure 2 in biological resource assessment report for survey locations).<sup>3</sup> No burrowing owls were observed during the focused survey. In addition, no owl signs (i.e., whitewash, owl pellets, feathers, burrows) were observed during the site survey due to numerous trees, limited open areas within and adjacent to the campus, regularly mowed and manicured lawns, and high pedestrian and vehicle traffic nearby. Based on this evidence, the Project site does not contain suitable habitat for burrowing owls. The MSHCP Burrowing Owl Survey Guidelines, Section 6.3.2, indicate a pre-construction burrowing owl survey will not be required due to the lack of habitat within the campus grounds.

The ornamental trees and shrubs that occur in the developed area of the site may support nests utilized by birds protected under MBTA or the California Fish and Game Code (Sections 3503, 3503.5, and 3515), as discussed previously. Therefore, any future development that would occur in accordance with the CBUSP Amendment could result in direct and indirect construction-related disturbance for nesting birds. **MM BIO-1** requires nesting bird surveys to be conducted prior to any ground-disturbing activities that would accompany future development within the CBU Specific Plan Zone. Impacts to biological resources would be less than significant with mitigation incorporated. (DEIR, p. 4.4-14.)

The following mitigation measures will be implemented:

**MM-BIO-1:** Initial ground-disturbing activities (e.g., demolition, grading) should be conducted outside the bird nesting season (February 15 through August 31). If Project activities are planned during the bird nesting season, nesting bird surveys shall be conducted within 30 days prior to disturbance to ensure birds protected under the MBTA are not disturbed by construction-related activities such as noise and increased human presence.

The survey shall consist of full coverage of on-site trees by a qualified biologist. If no active nests are found, no additional measures are required. If active nests are found, the nest locations shall be mapped by the biologist utilizing GPS equipment. The nesting bird species shall be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, near fledging). The biologist shall establish a no-disturbance buffer around each active nest. The buffer will be determined by the biologist based on the species present and surrounding habitat. No ground disturbance or construction activities

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<sup>3</sup> Biological Resources Assessment, LSA, September 12, 2017.

shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor activities may resume.

## **2. Local Policies or Ordinances**

**Threshold E:** Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.4-16 – 4.4-18.)

**Explanation:** The Project involves an amendment of the 2013 CBUSP. The proposed CBUSP Amendment is designed to create a framework to guide development of campus boundary and facility expansions in order to facilitate an increase in student enrollment. Additionally, the proposed CBUSP Amendment will provide a revised approach to regulating use and development within the proposed CBU Specific Plan Zone to facilitate a transition from the current suburban model to a more urban-style campus. Implementation of the proposed CBUSP Amendment would facilitate future development of CBU facilities on the Project site, which could require vegetation clearing, including tree removal and/or relocation. (DEIR, p. 4.4-16.)

Any future project involving CBU-administered properties or facilities will be subject to compliance with the CBUSP Amendment. Accordingly, removal or relocation of trees will follow the requirements of the landscape design guidelines outlined in the proposed CBUSP Amendment (for trees within the CBU Specific Plan Zone) and the City's Urban Forestry Policy Manual (for trees within City right-of-way). (DEIR, p. 4.4-17.)

For any future development within the CBU Specific Plan Zone, edge effects to existing off-site landscaping would be addressed in accordance with Chapter 7 (*Design Guidelines*) of the CBUSP Amendment. For example, a continuation of CBU's picturesque, park-like campus setting is required, and all landscaping near Magnolia Avenue, Adams Street, and Monroe Avenue would be designed to reinforce visual and thematic connections to the landscaping along these streets. The boundaries of the CBU Specific Plan Zone along Magnolia Avenue, Adams Street, Monroe Street, and Diana Avenue/SR-91 would be treated with recurring plant materials to visually unify the campus, while being mindful of the surrounding neighborhoods. If implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual and the CBU Tree Campus USA Urban Forest Management Guidelines to manage landscaping within the campus. (DEIR, p. 4.4-17.)

The City considers select tree species, such as palm trees and eucalyptus wind rows, to be of value to the City's heritage. The proposed CBUSP Amendment addresses heritage trees with a landscape design intended to protect and preserve them throughout the Project site in accordance with Policy HP-1.4 of the City's *General Plan 2025*.<sup>4</sup> Removal or relocation of heritage trees will be subject to City staff review. A prior cultural resources study identified a mature gum (*Eucalyptus Spp.*) windbreak tree located in a now-separate parcel to the south that was identified as a related feature

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<sup>4</sup> Historic Preservation Element, *City of Riverside General Plan 2025*. Page 26. City of Riverside, November 2007.

of the Hawthorne House. The subject tree is located within the southern boundary of The Colony at CBU, north of the baseball field (Figure 4.5-1). In addition, a few large trees are growing in the open field including a “Christmas tree” next to Magnolia Avenue, which is an ornamental pine (*Pinus sp.*). In the southeast corner of the Magnolia Lawn is a California live oak (*quercus agrifolia*), which is being preserved by CBU, along with another majestic pine and a ginko (*Ginko biloba*) tree. To help ensure a less than significant impact regarding possible heritage trees, **MM-BIO-2** shall be implemented. Chapter 8 of the proposed CBUSP Amendment provides methods, programs, and financing mechanisms to be used to assess the health and stability of the tree and administer appropriate treatment measures. (DEIR, p. 4.4-17.)

The City’s *General Plan 2025* includes objectives and policies to ensure that future development would not conflict with any local policies protecting biological resources, including tree preservation policies. This Project has been reviewed against these objectives and policies and found to be consistent with them (refer to Section 4.10 - Land Use for a consistency analysis). Through adherence with the objectives and policies of the *Riverside General Plan 2025*, implementation of the design elements outlined in the CBUSP Amendment, the CBU Tree Campus USA Urban Forest Management Guidelines, and the implementation of **MM-BIO-2**, the Project will have a **less than significant impacts with mitigation** on local policies or ordinances protecting biological resources. ((DEIR, p. 4.4-18.)

The following mitigation measures will be implemented:

**MM-BIO-2:** Prior to the issuance of a tree removal permit for any future development within the open field areas along Magnolia Avenue that would require removal of heritage trees, the applicant shall submit to the City for review and approval, a report prepared by a certified arborist that identifies on-site heritage, significant and/or specimen trees. The arborist report shall contain the information required under Chapter 28, Title III of the City’s Municipal Code, including (but not limited to) the following:

- The location, size, health, age, and number of onsite significant, heritage or specimen trees; and
- Recommendation(s) for preservation, relocation and/or replacement.

## C. CULTURAL RESOURCES

### 1. Historical Resources

**Threshold A:** Would the Project cause a substantial adverse change in the significance of a historical resource as defined in State CEQA Guidelines § 15064.5?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.5-45 – 4.5-52.)

**Explanation:** The cultural resources survey and evaluation assessment prepared for the Project (Wilkman Historical Services, 2018) provides an update to the historic designations for eight (8) CBU properties addressed in a prior cultural resources survey (JM Research and Consulting, 2012) and evaluates two (2) additional properties that were not administered by CBU at the time of adoption of the 2013 CBUSP. (DEIR, p. 4.5-45.)

Other than the changes to the status of CBU properties contained in the new cultural resources survey and evaluation assessment, the prior report serves as the Project's comprehensive cultural resources document. Two additional properties surveyed by JMRC are no longer extant within the CBU Specific Plan Zone. The Cooper House previously located at 3690 Adams Street has been relocated to 2909 Lime Street in Riverside. The Riverside Free Methodist Church previously located at 8431 Diana Avenue has been demolished to make room for the CBU Events Center. In addition, one stand pipe located in proximity of the athletic fields may be the only surficial remnant of the Riverside Lower Canal within the CBU Specific Plan Zone. However, the Riverside Lower Canal no longer exists within the CBU Specific Plan Zone (DEIR, p. 4.5-47.)

The prior historic evaluation identified ten (10) cultural resources to be significant and therefore eligible for either the national, State, or local register. The historic evaluation for the Project concluded select cultural resources previously identified as significant by the prior evaluation are not significant and therefore do not qualify for national, State, or local register eligibility. Two additional cultural resources previously identified by the prior evaluation as significant and therefore eligible for the local register have since been relocated or demolished and no longer exist within the CBU Specific Plan Zone. (DEIR, p. 4.5-51.)

The Project does not propose a specific development project. Rather, the Project proposes a framework under which subsequent development projects will be planned, designed, and constructed. For example, it is the intent of CBU to relocate the Hawthorne House to a currently unidentified site nearby the CBU campus but not necessarily within the Specific Plan Zone. Additionally, CBU anticipates the need to conduct alterations to the Rose Garden Village to better accommodate the anticipated need for improved student housing. (DEIR, p. 4.5-51.)

Any proposed subsequent projects, including improvements to, relocation, or demolition of existing campus facilities, will be subject to the development standards outlined in Draft EIR Table 4-5 in addition to the objectives and policies (Chapter 2), development standards (Chapter 4), design guidelines (Chapter 7), and implementation methods (Chapter 6) presented in the proposed CBUSP Amendment. Proposed improvements to modern facilities in proximity to cultural resources also would be subject to the development standards outlined in Draft EIR Table 4.5.A in addition to the objectives and policies (Chapter 2), development standards (Chapter 4), design guidelines (Chapter 7), and implementation methods (Chapter 8) presented in the CBUSP Amendment. (DEIR, p. 4.5-51.)

The EIR identified the following University facilities as qualifying as historical resources pursuant to CEQA. Modifications to these CBU historical resources (identified in EIR Table 4.5.C) would require a Certificate of Appropriateness pursuant to Title 20 of the RMC (DEIR, p. 4.5-51.):

- Neighbors of Woodcraft Historic District
- CBU Historic District
- Smith & Simmons [Dormitory] Halls
- Van Dyne Field House Gymnasium

- Wallace Book of Life [Theatre] Building
- Rose Garden Village
- Hawthorne House & Eucalyptus Tree

Unless specifically defined as a resource contributor, modifications subject to environmental review pertain only to those made to the exterior of a resource. Under CEQA, the demolition of a historical resource cannot be mitigated to a level of less than significant, so proposed demolition of these historical resources would require an EIR. (DEIR, p. 4.5-51.)

As self-mitigating project design features, the CBUSP Amendment implementation methods outlined in Section 4.5.4 of the EIR provide specific requirements, such as compliance with Title 20 of the RMC, to be met for all subsequent development projects, including reuse, repurpose, or demolition, pertaining to historical resources within the CBU Specific Plan Zone. To address CBU's specific intent to relocate the Hawthorn House and conduct alterations to the Rose Garden Village, mitigation measures **MM-CUL-1** and **MM-CUL-2** are proposed. With implementation of the CBUSP Amendment implementation methods in conjunction with **MM-CUL-1** and **MM-CUL-2**, impacts to historical resources are considered less than significant with mitigation incorporated. (DEIR, p. 4.5-51.)

The following mitigation measures will be implemented:

**MM-CUL-1:** If the Hawthorne House is moved to 8712 and 8720 Magnolia Avenue, it shall be subject to an administrative Design Review process and the following:

- Orient the main entrance to the Hawthorne House toward Magnolia Avenue, as was originally.
- The receiver is located within 1,000 feet of the Magnolia Avenue/Monroe intersection
- Place the Hawthorne House over the existing property line between 8712 and 8720 Magnolia Avenue to help with setback.
- Develop a substantial interpretive feature for placement within the front setback of the new location to interpret the history of the Hawthorne House, illustrating its historic location across Monroe Street, including the uses of the property and the former windrow that included the Hawthorne eucalyptus tree.
- Design the landscaping of the house to allow an unobstructed view to the house from Magnolia Avenue.

**MM-CUL-2:** Where alterations to the Rose Garden Village affect the exterior of the resource, the following treatments are required and subject to administrative Design Review:

- Entry Doors: Where an entry door is to be removed, the former location of the door will be retained as a recessed space, with a smooth stucco finish painted the same color as the former door. Wooden trim associated with the former door will be retained and painted the same color as the recess.
- Sliding Patio Doors: Any replacement of eight-foot-wide patio doors shall occur with clear anodized storefront creating a vertically-divided opening framed in clear anodized aluminum. The lower glass of the storefront shall be given a frosted opaque finish as visible from the exterior. On the interior, this lower area shall be mated to an interior wall finished in drywall to match the balance of the interior walls. The balance of the eight-foot-wide openings shall be given a stucco finish to match the balance of the existing building walls.

This measure shall be implemented to the satisfaction of the City Planning Division.

## 2. Archaeological Resources

**Threshold B:** Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.5-52 – 4.5-53.)

**Explanation:** The archaeological evaluation in the EIR utilized the prior cultural resources survey (JM Research and Consulting, 2012) for the 2013 CBUSP and the cultural resources survey and evaluation report prepared for the Project (Wilkman Historical Services, 2018). Through these investigations, archaeologists located the following artifacts within the CBU Specific Plan Zone (DEIR, p. 4.5-52):

- Three historic bottles were provided by CBU staff from a cistern associated with a residence that pre-dated the Free Methodist Church on the site now occupied by the Events Center.
- One granitic ground stone fragment, likely prehistoric, located along the former Riverside Lower Canal alignment.
- One historic irrigation feature possibly associated with the Riverside Lower Canal found in the area of the campus soccer field.
- Sixty historic artifacts, primarily bottles, uncovered near the Campus Central Plant during a previous construction project in that area.

The Project site is situated within the traditional boundary region of the Gabrieliño (Tongva), the Cahuilla, and the Luiseño Native American groups. There is a chance subsurface deposits related to Native American occupation of the region may exist within the CBU Specific Plan Zone; however, previous disturbance for grading and construction of existing CBU facilities make the likelihood of previously undocumented subsurface cultural resources remote. However, the Riverside Lower Canal is a cultural resource known to have traversed the CBU Specific Plan Zone,



so there is potential that ground disturbing activities in proximity to the alignment of the Lower Riverside Canal could expose resources associated with it. (DEIR, p. 4.5-52)

Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f) recognize that historical or unique archaeological resources may be accidentally discovered during project construction. This guideline recommends that immediate evaluation defined by qualified archaeologists be included in mitigation measures. This guideline also recommends that if the find is determined to be a historical or unique archaeological resource, that contingency funding and time allotments sufficient to allow for implementation and avoidance measures be available. (DEIR, p. 4.5-52)

Pursuant to Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f), mitigation measures **MM-CUL-3** and **MM-CUL-4** require cultural resources monitoring for ground-disturbing activities in native soils in proximity to the known alignment of the Riverside Lower Canal to ensure any unanticipated archaeological discoveries are managed in accordance with CEQA guidelines. Additionally, at a programmatic level, **MM-CUL-5** requires all future development within the CBU Specific Plan Zone to protect cultural resources by temporarily halting ground disturbing activities and consulting with a qualified archaeologist in the event of an unanticipated cultural resources encounter. With implementation of **MM-CUL-3**, **MM-CUL-4**, and **MM-CUL-5**, impacts to archaeological resources are considered less than significant with mitigation incorporated. (DEIR, p. 4.5-52)

The following mitigation measures will be implemented:

**MM CUL-3:** Prior to the issuance of grading permits, the applicant shall submit to the City for review and approval, evidence that qualified professional archeologist(s) has been retained to monitor ground-disturbing activities of native soil (e.g., vegetation removal, grading, excavation, removal of foundations, and/or trenching) occurring within 50 feet of the following CBU Facilities:

- Lancer Outdoor Athletic Complex
- Physical Plant/Shops (Facilities & Planning Services Maintenance and Operations)
- Lancer Arms
- Former Riverside Lower Canal
- Former San Carlos Apartments (The Point)

The duration and frequency of monitoring shall be determined by the City in coordination with the archeologist(s). Factors determining the duration and frequency of monitoring shall include (but not be limited to) the rate of excavation and grading activities, the materials being excavated (fill or native soils), the depth of excavation, the location of excavation, and if found, the abundance and type of archaeological resources encountered.

As determined appropriate by the City in coordination with the archaeologist(s), monitoring may be reduced or discontinued in areas where the archaeologist(s) determines on-site activities will not disturb archaeological resources.

This mitigation measure, including the contact information of the project archaeologist, shall be incorporated in all construction contract documentation and be implemented to the satisfaction of the City Planning Division.

**MM CUL-4:** If archaeological resources are encountered during ground-disturbing activities, the archaeologist(s) shall be empowered to temporarily divert or redirect ground-disturbing activities in the vicinity in order to make an evaluation of the find. The archaeological monitor(s) shall notify the City, applicant, and appropriate Native American tribes should any such discovery be made during the course of ground-disturbing activities.

The archaeologist(s) shall recommend appropriate treatment measures (i.e., avoidance, removal, or preservation in place) to reduce or avoid impacts to buried resources, and determine appropriate treatment, which may include preservation in place or the development and implementation of a testing/data recovery investigation treatment plan.

Should the archaeologist(s) determine through consultation with the Native American tribes that the discovery is a resource pursuant to Section 15064.5, avoidance or other mitigation will be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2.

A final report detailing the significance and treatment of discovered archaeological resources shall be prepared by the archaeologist and submitted to the City and the Eastern Information Center at University of California, Riverside. All cultural material, excluding sacred, ceremonial, grave goods, and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site shall be curated, as determined by the treatment plan, according to current professional repository standards.

This mitigation measure, including the contact information of the archaeologist, shall be incorporated in all construction contract documentation and implemented to the satisfaction of the City Planning Division.

**MM-CUL-5:** If archaeological resources are encountered during ground-disturbing activities, the archaeologist(s) shall be empowered to temporarily divert or redirect ground-disturbing activities in the vicinity in order to make an evaluation of the find. The archaeological monitor(s) shall notify the City, applicant, and appropriate Native American tribes should any such discovery be made during the course of ground-disturbing activities.

The archaeologist(s) shall recommend appropriate treatment measures (i.e., avoidance, removal, or preservation in place) to reduce or avoid impacts to buried resources, and determine appropriate treatment, which may include preservation in place or the development and implementation of a testing/data recovery investigation treatment plan.

Should the archaeologist(s) determine through consultation with the Native American tribes that the discovery is a resource pursuant to Section 15064.5, avoidance or other mitigation will be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2.

A final report detailing the significance and treatment of discovered archaeological resources shall be prepared by the archaeologist and submitted to the City and the Eastern Information Center at University of California, Riverside. All cultural material, excluding sacred, ceremonial, grave goods, and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site shall be curated, as determined by the treatment plan, according to current professional repository standards.

This mitigation measure, including the contact information of the archaeologist, shall be incorporated in all construction contract documentation and implemented to the satisfaction of the City Planning Division.

### **3. Paleontological Resources**

**Threshold C:** Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.5-53 – 4.5-54.)

**Explanation:** As defined in CEQA Guidelines Section 15064.5(a)(3)(D), significant paleontological resources are generally considered to be historical resources. Subsequent development projects facilitated by the proposed Project could result in substantial earthwork and other ground-disturbing activities. However, according to the Riverside General Plan 2025, significant fossil bearing localities in the City are generally located along the Santa Ana River and south of Mockingbird Canyon Reservoir. The CBU campus is not located in the immediate vicinity of either the Santa Ana River or Mockingbird Canyon Reservoir and therefore is not located in the immediate vicinity of significant fossil bearing localities. Additionally, the CBU campus is completely urbanized and has been previously graded, so the likelihood of encountering significant paleontological resources from implementation of the CBUSP Amendment is low.

In accordance with policy HP 1.3 of the City's General Plan 2025, the City is required to protect paleontological resources pursuant to applicable local, State, and federal laws. As with significant archaeological resources, vertebrate or unique paleontological resources are generally considered to be historical resources, as defined in CEQA Guidelines Section 15064.5(a)(3)(D). The CBU Specific Plan Zone is underlain by old alluvial fan deposits (Qof) of late to middle Pleistocene age (11,700 to 781,000 years ago) that covers Cretaceous granitic rocks. These deposits are generally sandy alluvial fan deposits covering extensive areas along the Santa Ana River and may include a thin layer of Holocene (11,700 years ago to present) alluvial fan material. Although Holocene sediments generally are considered too young to yield paleontological resources, sediments of middle and late Pleistocene age are known to yield paleontological resources.

Due to the age of the sediments underlying the project site, paleontological resources may be present in these potentially fossil-bearing soils and rock formations below the ground surface.

Ground-disturbing activities in these potentially fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources. Therefore, implementation of mitigation measures **MM-CUL-6** is required in the event that unanticipated paleontological resources are unearthed during project construction to ensure paleontological resources will be subject to scientific recovery and evaluation.

With implementation of **MM-CUL-6**, impacts to paleontological resources are considered less than significant with mitigation incorporated.

The following mitigation measures will be implemented:

**MM-CUL-6:** Prior to issuance of grading permits, the City shall verify that the following note is included on all grading plans of subsequent development projects executed pursuant to the California Baptist University Specific Plan:

“If any suspected paleontological resources (fossils) are discovered during ground-disturbing activities, the construction supervisor is obligated to halt work within a 100-foot radius around the find until a qualified paleontologist can assess the significance of the find. The project paleontologist shall monitor remaining ground-disturbing activities in native soils at the project site and shall be equipped to record and salvage fossil resources that may be unearthed during construction. The paleontologist shall temporarily halt or divert construction equipment to allow recording and removal of the unearthed resources. Any fossils found shall be offered for curation at a curation facility approved by the City. A report of findings, including, when appropriate, an itemized inventory of recovered specimens and a discussion of their significance, shall be prepared upon completion of the steps outlined above. The report and inventory, when submitted to and approved by the appropriate lead agency, will signify completion of the program to mitigate impacts on paleontological resources.”

This measure shall be implemented to the satisfaction of the City Planning Division.

## **D. GEOLOGY AND SOILS**

### **1. Geology-Related Hazards**

**Thresholds C:** Would the Project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

**Finding:** Less than significant impact with mitigation. (DEIR, pp. 4.6-18 - 4.6-19.)

**Explanation:** The Project site is located within Seismic Zone 4 as defined by the California Building Code (CBC) having the highest seismic activity. The Project site lies on relatively flat terrain with no steep slopes, and no landslides or areas of mass movement exist on-site. The potential for liquefaction generally occurs during strong ground shaking within relatively cohesion-less, loose sediments where the groundwater is typically less than 50 feet below the surface. According to the City’s *General Plan 2025 Final Program EIR*, the Project site is located

in an area identified as having a liquefaction potential ranging from low to high. As a result, much of the soil profile below ground level is susceptible to liquefaction during strong ground shaking. While the potential for surface manifestations like bearing failures and sand boils is considered low, the Project site is susceptible to differential settlement from liquefaction. This impact is potentially significant, and mitigation is required. (DEIR, pp. 4.6-18 - 4.6-19.)

In order to reduce impacts from seismic-related ground failure, including liquefaction, all future design and construction administered under the CBUSP Amendment will be designed to resist seismic impacts in accordance with CBC requirements in effect at the time of submittal of a development application and Title 16, Buildings and Construction, of the RMC. Project plans will be reviewed during the plan check process to ensure seismic safety measures are incorporated. These measures take into account ground shaking hazards that are typical to Southern California. Prior to issuance of entitlements or building permits, the City shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and professional engineering standards appropriate for the seismic zone in which such construction may occur. With implementation of **MM-GEO-1**, impacts from seismic-related ground failure, including liquefaction, would be less than significant with mitigation incorporated. (DEIR, p. 4.6-19.)

The following mitigation measures will be implemented:

**MM-GEO-1:** Prior to any entitlement process for all future development projects administered under the CBUSP Amendment the applicant shall commission site-specific, design-level geotechnical investigations by a certified engineering geologist or other qualified professionals for all grading and construction projects subject to geologic hazards, including fault rupture, severe ground shaking, liquefaction, landslides, collapsible or expansive soils, subsidence, manufactured slope stability (if applicable), and the engineering and construction of occupied or inhabited structures. The findings and recommendations contained in these reports shall be implemented prior to issuance of grading, building, and/or occupancy permits as applicable. As necessary, the City may require additional studies and/or engineering protocols to meet its requirements. This measure shall be implemented to the satisfaction of Public Works and the Community & Economic Development Department, Building and Safety Division, or designee.

In addition to the aforementioned mitigation measure, adherence to standard procedures, including compliance with CBC requirements in effect at the time of submittal of project-specific development entitlement and building permit applications, the City's development review process, and existing laws and regulations regarding seismic and other geotechnical hazards will ensure all impacts related to geology and soils are reduced to less than significant levels.

**Threshold F:** Would the Project 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?

**Finding:** Less than significant with mitigation. (DEIR pp. 4.6-21 - 4.6-23.)

Explanation: The closest active or potentially active fault is an unnamed fault located approximately six (6) miles east of the Project site along the State Route 60/Interstate 215 freeway junction. The proposed Project site is not located within an Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zone Act or as defined by the City's *General Plan 2025*. In addition, there is no evidence of any faults or faulting activity on the Project site. According to the City's *General Plan 2025 and Supporting Documents EIR*, the City is surrounded by several significant faults, including the Elsinore Fault 9.5 miles southwest of the Project, the San Jacinto Fault 12.5 miles northeast of the Project site, San Andreas Fault 20 miles northeast of the Project site, in addition to the unnamed fault along the State Route 60/Interstate 215 freeway junction located approximately six (6) miles east of the Project site. Due to the proximity of significant faults with the potential to generate moderate to large earthquakes, the City, and therefore the Project site, has the potential to experience ground acceleration greater than 35 to 43 percent. However, these probabilistic ground motion values are within current limits established by the CBC and UBC.

Implementation of the proposed CBUSP Amendment will result in the construction of approximately 400,000 square feet of academic, recreational, and student housing facilities and 805,000 square feet of parking structure(s) with integrated office space. The Project site is located within Seismic Zone 4 as defined by the CBC, which has 0.40 ground acceleration, having the highest seismic activity. The Project site has been previously excavated, filled, graded, and leveled with the development of the CBU campus. Surrounding areas are also primarily developed and not located on a hillside. Additionally, pursuant to CAL-OSHA excavation standards, temporary slopes for construction will be managed according to applicable safety and building regulations, as detailed in Section 4.6.4 of this Draft EIR.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesion-less, loose sediments where the groundwater is typically less than 50 feet below the surface. According to the City's *General Plan 2025 EIR*, the Project site is located in an area identified as having a liquefaction potential ranging from low to high. As a result, much of the soil profile below ground level is susceptible to liquefaction during strong ground shaking. While the potential for surface manifestations like bearing failures and sand boils is considered low, the Project site is susceptible to differential settlement from liquefaction. This impact is potentially significant, and mitigation is required.

In order to reduce impacts from seismic-related ground failure, including liquefaction, all future design and construction administered under the CBUSP Amendment will occur in accordance with CBC requirements in effect at the time of building plan check submittal pursuant to State law, and all grading plans will be subject to City Staff review for regulatory compliance. Additionally, the CBUSP Amendment shall be required to implement **MM-GEO-1** for all future development projects proposed under the CBUSP Amendment.

Due to the placement of artificial fill on the Project site from prior development, there is little possibility that the upper soil layers will be saturated by groundwater. However, it is possible soil within localized areas could become saturated from long-term landscape irrigation, changes in site drainage, storm water basins, septic system use, or a pipe leak and result in localized soil collapse. Therefore, all future development and improvements administered under the CBUSP Amendment will be subject to project- and site-specific geotechnical studies conducted by a certified

engineering geologist or other qualified professional; the findings and recommendations of which shall be implemented pursuant to **MM-GEO-1**.

CBU owns and operates two on-site wells equipped with 60-horsepower pumps with an approximate maximum capacity of 265 gallons per minute. Ground subsidence may occur as a response to on-site groundwater extraction from below the ground surface, or natural forces such as earthquake movements, which can cause abrupt elevation changes or densification of low density granular soils during an earthquake event that may cause several inches of settlement. The degree to which the Project site would be susceptible to subsidence and seismic settlement is dependent on the type of soil underlying the specific development area within the Project site. As there are five (5) soil types underlying the Project site, the heterogeneous nature of these soils requires evaluation and management of subsidence risk on a site-by site basis as future development and improvements are proposed under the CBUSP Amendment. Accordingly, all future development and improvements administered under the CBUSP Amendment will be subject to project- and site-specific geotechnical studies conducted by a certified engineering geologist or other qualified professional; the findings and recommendations of which shall be implemented pursuant to **MM-GEO-1**.

In accordance with **MM-GEO-1**, future development and improvements administered under the CBUSP Amendment will be required to prepare a project- and site-specific geotechnical report based on actual building foundation locations to ensure compliance with all applicable standards. Prior to issuance of any entitlements or building permits, the City shall review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC in effect at the time of building plan check submittal of a project-specific development, as well as City Building Code and professional engineering standards appropriate for the seismic zone in which such construction may occur. With implementation of **MM-GEO-1**, the City's development review process, and existing laws and regulations regarding seismic and other geotechnical hazards, the proposed Project will have less than significant impacts relative to landslides, lateral spreading, subsidence, liquefaction, or collapse. Impacts would be less than significant with mitigation incorporated. (DEIR, p. 4.6-23.)

**MM-GEO-1** is contained in its entirety under Threshold C above.

**Threshold G:** Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Finding: Less than significant with mitigation. (pp. 4.6-23 - 4.6-24.)

Explanation: Expansive soils generally have a significant amount of clay particles that can give up water (shrink) or take on water (swell). The change in volume exerts stress on buildings and other loads placed on these soils. The extent of shrink/swell is influenced by the amount and kind of clay in the soil. The occurrence of these soils is often associated with geologic units having marginal stability.

The various Hanford, Arlington, and Buchenau soils underlying the Project site are sandy loam with a low to moderate shrink-swell potential and therefore are considered to be non-critically expansive. Specialized construction procedures designed to minimize expansive soil forces are not

anticipated. However, additional evaluation of soils for expansion potential should be conducted by the geotechnical engineer prior to any entitlements process. Therefore, all future development and improvements administered under the CBUSP Amendment will be subject to project- and site-specific geotechnical studies conducted by a certified engineering geologist or other qualified professional; the findings and recommendations of which shall be implemented pursuant to **MM-GEO-1**. With implementation of mitigation measure **MM-GEO-1**, the City's development review process, and existing laws and regulations regarding seismic and other geotechnical hazards, the proposed Project will have less than significant impacts relative to expansive soils. Impacts would be less than significant with mitigation incorporated.

**MM-GEO-1** is contained in its entirety under Threshold C above.

## **E. GREENHOUSE GAS EMISSIONS**

### **1. Policy Consistency**

**Threshold B:** Would the Project conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

Finding: Less than significant with mitigation. (DEIR, pp. 4.7-21 – 4.7-27.)

Explanation: The *Riverside Restorative Growth Print - Climate Action Plan* (RRG-CAP) identifies local greenhouse gas reduction measures by sector and the GHG reduction potential associated with each measure. The proposed Project incorporates certain measures as Design Features. Table 4.7.E in the EIR details the Project Design Features and additional mitigation that are necessary to ensure consistency with applicable local reduction measures of the City's RRG-CAP. (DEIR, p. 4.7-21.)

With implementation of the Project Design Features, the Project's GHG emissions are estimated to be 22,655 MTCO<sub>2</sub>e/year. In comparison, the Project's GHG emissions without implementation of Project Design Features and mitigation is estimated 25,999 MTCO<sub>2</sub>e/year corresponding to a 12.86 percent reduction. With the incorporation of Project Design Features as implementation by mitigation measures **MM-GHG-1** and **MM-GHG-2**, the Project will be consistent with the City's RRG-CAP. Through consistency with the CAP, the Project would generate greenhouse gas emissions that are considered to be less than significant with mitigation incorporated. (DEIR, p. 4.7-27.)

The following mitigation measures will be implemented:

**MM-GHG-1:** To ensure consistency with the City's RRG-CAP, the project shall design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:

- Increase insulation such that heat transfer and thermal bridging is minimized;
- Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption;



- Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment; and
- Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.

This measure shall be implemented to the satisfaction of the City Building and Safety Division.

**MM-GHG-2:** To ensure consistency with the City’s RRG-CAP and to implement the Water Conservation Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 7: Design Guidelines), construction plans for each increment of future development resulting from implementation of the CBUSP shall include a comprehensive water conservation strategy appropriate for the development and its location. The strategy may include the following, plus other innovative measures that may be appropriate:

- Create water-efficient landscapes within the development.
- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Use reclaimed water or non-potable well water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water or non-potable well water, if available.
- Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals.
- Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.

This measure shall be implemented to the satisfaction of the City Planning Division.

## **F. HAZARDS AND HAZARDOUS MATERIALS**

### **1. Upset and Accidents**

**Threshold B:** Would the project 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?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.8-17 – 4.8-19.)

**Explanation:** The Project does not propose a specific development project. However, the Project proposes a framework under which specific development projects will be planned, designed, and executed in the future. As a University campus with educational, residential, and commercial uses containing historic-era facilities, some of which are over 100 years old, future development

projects may involve the release of hazardous materials such as asbestos and lead based paint into the environment. (DEIR, p. 4.8-17.)

The area encompassing the Project developed slowly during the late 19<sup>th</sup> and early 20<sup>th</sup> Centuries as small citrus groves and associated farm- and ranch-steads. Agricultural chemicals, such as pesticides, herbicides, and fertilizers likely were used on the Project site. However, by 1975, no agricultural uses remained on the project site, and previous agricultural properties were developed for academic, administrative, and athletic purposes. The Project site's former use for agriculture therefore does not constitute a significant human or environmental health risk from pesticides in the soil. Notwithstanding, future development administered pursuant to the Project that would require grading permits and/or renovation, rehabilitation, or demolition of CBU structures shall implement mitigation measure **MM-HAZ-1**, which would require a Phase I Environmental Site Assessment in accordance with American Society for Testing and Materials (ASTM) Standard of Practice E 1527-13, "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process." The Phase I Environmental Site Assessment would determine if a development site has the potential to contain hazardous materials. If the Phase I determines there is the potential for hazardous materials, a Phase II Assessment will be required to include soil testing and testing of paint. If the Phase II Assessment determines there are hazardous materials on a development site within the proposed Project, then remediation will be required prior to renovation, rehabilitation, or demolition of CBU structures.

Additionally, structures constructed prior to 1978 have the potential to contain lead-based paint (LBP), asbestos-containing materials (ACM), and organochlorine pesticides (from termite applications). Prior to the 1970s, asbestos was incorporated into various construction components including floor tiles and thermal insulation, and LBP and organochlorine pesticides can be found in structures built prior to 1978. Due the age of many structures located on the CBU campus, there exists a potential significant hazard related to exposure of workers and the public to LBP, ACM, and organochlorine pesticides during future development activities that would involve renovation, rehabilitation, or demolition of CBU structures.

If not properly handled and removed, asbestos can become airborne during renovation, rehabilitation, or demolition activities and pose a health hazard. Additionally, LBP and organochlorine pesticides can pose an ingestion hazard if they become entrained into the air or water during renovation, rehabilitation, or demolition activities. Therefore, since it is unknown whether there is ACM, LBP, and/or organochlorine pesticides in the buildings on-site, implementation of Mitigation Measure **MM-HAZ-2** shall be incorporated for all future development activities that would involve renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, which will ensure that all ACM, LBP, and/or organochlorine pesticides-containing materials are identified and remediated per the requirements identified by the County of Riverside Department of Environmental Health (DEH). With implementation of mitigation measures **MM-HAZ-1** and **MM-HAZ-2** the Project's impacts from the release of hazardous materials into the environment are less than significant with mitigation incorporated.

The following mitigation measures will be implemented:

**MM-HAZ-1:** Prior to issuance of a grading permit or prior to renovation, rehabilitation, or demolition of CBU structures constructed prior to 1978, a Phase I Environmental Site Assessment shall be conducted in accordance with American Society for Testing and Materials (ASTM) Standard of Practice E 1527-13, “Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process.” The findings and recommendations contained in the Phase I Environmental Site Assessment shall be implemented. As necessary, the City may require additional studies and/or remediative protocols to meet its requirements. This measure shall be implemented to the satisfaction of the City Community and Economic Development Director.

**MM HAZ-2:** Prior to renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, a lead-based paint, asbestos, and organochlorine pesticide (from termite applications) survey shall be conducted. Should lead-based paint, asbestos-containing materials, and/or organochlorine pesticides be identified during survey, abatement of these materials will be accomplished in accordance with local, State, and federal guidelines. This measure shall be implemented to the satisfaction of the City Community and Economic Development Director.

## **2. Schools**

**Threshold C:** Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.8-19- 4.8-20.)

**Explanation:** The Project site itself is a school (CBU), and there are several additional schools in the vicinity of the Project site. The nearest schools to the Project site include Chemawa Middle School approximately 0.13 mile west of the Project site, Sherman Indian High School approximately 0.28 mile west of the Project site, Monroe Elementary School approximately 0.28 mile north of the Project site, and Arlington High School approximately 0.45 mile south of the Project site. (DEIR, p. 4.8-19)

The CBUSP Amendment does not propose a specific development project; it does, however, propose a framework under which specific development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. As a University campus with educational, residential, and commercial uses, future development projects may produce hazardous materials and/or waste; however, all businesses that handle or have on-site transportation of hazardous materials are required to comply with the provisions of the City’s Fire Code and any additional regulations pursuant to California Health and Safety Code Sections 25503 and 25507 for the Business Emergency Plan. (DEIR, p. 4.8-19)

CBU shall continue to implement its Hazardous Material & Hazardous Waste Maintenance Program to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site, detail proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an updated spill contingency plan,

outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol. In addition, CBU shall implement Mitigation Measure **MM-HAZ-2** for all future development activities that would involve renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, which will ensure that all ACM, LBP, and/or organochlorine pesticides-containing materials are identified and remediated per the requirements identified by the County of Riverside Department of Environmental Health (DEH). Through compliance with existing federal and State regulations described above, as well as **MM-HAZ-2**, impacts associated with the exposure of schools to hazardous materials handled or emitted by implementation of the CBUSP Amendment will be less than significant with Mitigation Incorporated. (DEIR, p. 4.8-20)

**MM-HAZ-2** is contained in its entirety under Threshold B above.

### **3. Listed Hazardous Materials Site**

**Threshold D:** Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

**Finding:** Less than significant impact with mitigation. (DEIR, p. 4.8-20.)

**Explanation:** Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. According to Government Code, Section 65962.5(a), there are no hazardous materials or waste sites located on the Project site. The CBUSP Amendment does not propose a specific development project; it does, however, propose a framework under which specific development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment. Implementation of **MM HAZ-1** and **MM HAZ-2** would ensure environmental conditions at the Project site would be recognized and mitigated as applicable, and implementation and operation of the CBUSP Amendment, would not create a significant hazard to the public or the environment. Therefore, impacts are less than significant with mitigation incorporated. (DEIR, p. 4.8-20.)

**MM-HAZ-1** and **MM-HAZ-2** are contained in their entirety under Threshold B above.

### **4. Airport Hazards**

**Threshold E:** Would the Project be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public use airport, and would the Project result in a safety hazard for people residing or working in the project area?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.8-20 – 4.8-21.)

**Explanation:** The Riverside County Airport Land Use Commission (RCALUC) has developed Land Use Compatibility Plans for each airport in the County of Riverside, including the Riverside Municipal Airport, which is located approximately 1.1 miles north of the Project. The Project was reviewed and approved by the Riverside County Airport Land Use Commission (RCALUC) on

November 9, 2017 under case ZAP 1090RI17 and was determined consistent with the 2005 *Riverside Municipal Airport Land Use Compatibility Plan*. (DEIR, p. 4.8-20)

The northeastern corner of the Project lies within Zone D (Primary Traffic Patterns and Runway Buffer Area), with the remainder of the Project located in Zone E (Other Airport Environs) of the Land Use Compatibility Plan prepared for Riverside Municipal Airport. Proposal for new buildings or structures and proposals for reuse of (i.e., change in use with or without reconstruction) of existing buildings within a portion of the campus in Airport Land Use Compatibility Zone D are subject to the City's administrative Design Review process, which shall include an evaluation for airport land use compatibility pursuant to the ALUCP. Additionally, any development over 70 feet tall in Zone D will be subject to airspace review by the RCALUC, and highly noise-sensitive outdoor nonresidential uses are prohibited. The residential density criteria for that portion of Zone D at Riverside Municipal Airport lying within the boundary of the City of Riverside is established to enable the density of future development to be similar to what now is common in the area. Additionally, schools, hospitals, and nursing homes are discouraged within Zone D. Any new buildings or changes in the use of existing buildings within Zone D shall also be evaluated for consistency with regard to intensity limitations. As detailed in Table 4.8.A, any development over 100 feet tall in Zone E will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks. (DEIR, p. 4.8-21)

The continued use of existing buildings is not subject to the ALUCP criteria limiting intensity of uses. For new development, the Project incorporates development standards designed to maintain compliance with the Riverside County ALUCP compatibility strategies for the Riverside Municipal Airport. Generally, building placement and massing will occur along primary interior circulation routes. Taller buildings and structures will be placed at the center of the core campus area. Buildings will step down in height toward the campus edges and in particular, buildings along the edges will be of a scale and mass that are compatible with buildings on adjacent non-CBU properties. Mechanical/electrical equipment and towers, exhaust stacks, and other integral parts of buildings or structures shall be included in the overall height and shall be screened from view by parapet walls and/or other architectural elements. Considerations for additional height increases may be permitted for architectural elements, cupolas, domes, or roof enhancements pursuant to Chapter 19.560 of the Zoning Code for exceptions to height and subject to the review of the RCALUC. (DEIR, p. 4.8-21)

Light standards generally shall be a maximum height of 99 feet. However, higher standards may be installed as required for specific needs, subject to review by the RCALUC for compliance with the Riverside County ALUCP. Hazards to flights are prohibited, which include physical (e.g. tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited. Mitigation measure **MM-HAZ-3** ensures that structures proposed within the Project will be required to comply with all regulations in the Riverside County ALUCP; therefore, compliance with all standards and regulations of the Riverside County ALUCP will ensure impacts associated with this issue will be considered less than significant with implementation of mitigation. (DEIR, p. 4.8-21.)

The following mitigation measures will be implemented:

**MM-HAZ-3:** Prior to issuance of building permits for any new structure or remodeling that would increase the height of any existing structure, CBU (or its successor-in-interest, if applicable) shall submit documentation verifying that the structure's elevation above mean sea level (at top point, including all roof-mounted equipment and lighting, if applicable): (1) will not exceed the elevation of Runway 16-32 at its southerly terminus (747.5 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway; and, (2) will not exceed the elevation of Runway 9-27 at its easterly terminus (815 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway. If both of these requirements cannot be met for any given structure, the applicant shall file Form 7460-1 with the Federal Aviation Administration, and no building permit shall be issued until a "Determination of No Hazard to Air Navigation" is received from the Federal Aviation Administration and filed with the City of Riverside Planning Division, the City of Riverside Building and Safety Division, the Riverside County Airport Land Use Commission, and manager of Riverside Municipal Airport.

## **G. NOISE**

### **1. Exceeds Established Standards**

**Threshold A:** Would the project result in 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?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.12-19 – 4.12-32.)

#### *Construction Noise*

**Explanation:** Construction noise would result in a temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project. Although construction noise is exempt from the City's noise standards when activities occur between the permitted hours, construction could still result in disturbances to noise-sensitive receptors in a Project's vicinity, resulting in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the Project. To ensure maximum reduction in temporary or periodic increase in ambient noise levels generated by construction activities, standard best management construction noise reduction measures shall be implemented, as identified as mitigation measure **MM-NOI-1**. (DEIR, p. 4.12-23.)

#### *Long-Term Traffic Noise*

**Explanation:** With the addition of Project traffic, noise levels on surrounding roadways would be within the normally acceptable range (up to 60 dBA CNEL) for residential and school land uses or traffic-noise level increases associated the Project would be less than the increase considered to be perceptible by the human ear in an outdoor environment. Therefore, significant traffic noise impacts would occur for off-site land uses, and no mitigation is required. (DEIR, p. 4.12-27.)

With windows open, residential units on the campus would not meet the City's normally acceptable school interior noise standard of 45 dBA CNEL during the daytime (7:00 a.m. to 10:00

p.m.) and 35 dBA CNEL during the nighttime (10:00 p.m. to 7:00 a.m.). A heating, ventilation, and air-conditioning (HVAC) system would allow for windows to be closed in order to reduce noise levels for students and faculty to meet the City's normally acceptable interior noise level criterion of 45 dBA CNEL. Implementation of **MM-NOI-2** would require a project-specific acoustical study to determine specific insulation and other structural requirements such as an HVAC system to allow all windows to remain closed in order to reduce interior noise levels by 25 dBA, resulting in interior noise levels that meet the City's interior noise level criterion of 45 dBA CNEL. Therefore, impacts related to interior noise levels during the daytime (7:00 a.m. to 10:00 p.m.) would be less than significant with mitigation incorporated. (DEIR, p. 4.12-28.)

Noise levels within the Project are expected to reach approximately 68.7 dBA CNEL would be within the City's conditionally acceptable noise level of 60 to 70 dBA CNEL for school uses when noise reduction requirements and noise insulation features are included in the design to meet the interior noise standard. However, this noise level would exceed the City's conditionally acceptable noise level of 60 to 65 dBA CNEL for single-family residential land uses. In addition, this noise level would be considered conditionally unacceptable for amphitheater land uses, within the City's conditionally acceptable noise level of 70 dBA CNEL for athletic field land uses, and within the City's conditionally acceptable noise level of 65 to 75 dBA CNEL for office land uses. Therefore, implementation of **MM-NOI-2** would be required to ensure that projects developed under the proposed Project would meet the City's land use compatibility standards. Impacts would be less than significant with mitigation incorporated (DEIR, p. 4.12-29.)

#### *On-Site Stationary Noise*

Explanation: Since the specific land uses and their placement within the Project are unknown at this time, **MM-NOI-3** shall be implemented to ensure construction of future equipment and land uses within the Project would not expose persons to noise levels in excess of the noise attenuation requirements contained in the City's General Plan or Municipal Code. With incorporation of **MM-NOI-3**, implementation of the Project is not expected to expose persons to excessive construction noise levels. Impacts would be less than significant with mitigation incorporated. (DEIR, p. 4.12-31.)

Since the precise details regarding the location and size of future noise generating equipment or land uses including HVAC equipment, athletic fields, and performance art/amphitheater facilities are unknown at this time, **MM-NOI-4** shall be implemented to ensure future equipment and land uses within the Project would not expose persons to noise levels in excess of the noise attenuation requirements contained in the City's General Plan or Municipal Code. With incorporation of **MM-NOI-4**, implementation of the Project is not expected to expose persons to excessive operational noise levels. Impacts would be less than significant with mitigation incorporated. (DEIR, p. 4.12-31.)

The following mitigation measures will be implemented:

**MM-NOI-1:** Prior to issuance of grading permits for any project within the CBU Specific Plan Zone, the project contractor shall implement the following best management practice measures during all construction activities:

- Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.
- Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.
- Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction.
- Avoid unnecessary idling by shutting off engines that are expected to idle for more than 5 minutes.
- Designate a "disturbance coordinator" who is responsible for responding to any local complaints about construction noise. The disturbance coordinator shall determine the cause of any noise complaint and shall determine and implement measures warranted to resolve the noise complaint.

These measures shall be implemented to the satisfaction of the City Public Works Department.

**MM-NOI-2:** Prior to the issuance of grading and/or building permits, new development within the CBU Specific Plan Zone shall require an acoustical analysis for all noise-sensitive projects located in an area with noise levels greater than 60 dBA CNEL in order to comply with the City's noise and land use compatibility standards. All new residential land uses shall be designed to maintain an interior standard of 45 dBA CNEL during the daytime (7:00 a.m. to 10:00 p.m.) and 35 dBA CNEL during the nighttime (10:00 p.m. to 7:00 a.m.) or less. In addition, all new school land uses shall be designed to maintain a standard of 45 dBA CNEL or less in building interiors. Noise reduction measures to achieve the applicable noise level could include, but not be limited to, forced air ventilation so that windows can remain closed and/or upgraded wall and window assemblies. This measure shall be implemented to the satisfaction of the City Planning Division.

**MM-NOI-3:** Prior to the issuance of grading and/or building permits, a noise impact assessment shall be conducted for new development within the CBU Specific Plan Zone that would result in potentially significant noise impacts within 300 feet of existing sensitive receptors. The noise impact assessment shall develop appropriate noise reduction measures to reduce noise levels consistent with the City's land use compatibility standards. This measure shall be implemented to the satisfaction of the City Planning Division.

**MM-NOI-4:** Prior to issuance of occupancy permits, design considerations and shielding must be implemented to ensure that all HVAC equipment is located, enclosed, shielded, or otherwise designed to reduce HVAC-related noise sources at the nearest sensitive receptors to 55 dBA at the property line. This measure shall be implemented to the satisfaction of the City Planning Division.



## 2. Excessive Groundborne Vibration or Groundborne Noise Levels

**Threshold B:** Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.12-32 – 4.12-33.)

### *Construction Noise*

**Explanation:** Ground-borne vibration levels from construction activities very rarely reach levels that can damage structures, but these levels are perceptible near active construction sites. The Project site contains existing structures that would be subjected to groundborne vibration as well as nearby structures including Chemawa Middle School, Sherman Indian High School, and single-family and multi-family residences some of which are between 10 and 25 feet from the Project. Additionally, the Project contains several historic structures built prior to the 1950s, and since specific land uses and placement is unknown at this time, **MM-NOI-5** shall be required to ensure construction activities associated with development allowed under the Project would not expose persons or structures to excessive ground-borne vibration. (DEIR, p. 4.12-33.)

The following mitigation measures will be implemented:

**MM-NOI-5:** Prior to the issuance of grading permits, development within the CBU Specific Plan Zone that will be located within 200 feet of historic resources, as determined by a California Historical Resource Status Code, shall require a vibration assessment demonstrating that FTA Groundborne Vibration Impact Criteria for the proposed land use are not exceeded. If necessary, the vibration assessment shall demonstrate project modifications required to ensure criteria compliance. This measure shall be implemented to the satisfaction of the City Planning and Historic Preservation Divisions.

**Threshold C:** Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.12-34.)

**Explanation:** Please refer to the discussion under Threshold A above. (DEIR, p. 4.12-34.)

**Threshold D:** Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

**Finding:** Less than significant with mitigation. (DEIR, pp. 4.12-34.)

**Explanation:** Please refer to the discussion under Threshold A above. (DEIR, p. 4.12-34.)

## H. TRIBAL CULTURAL RESOURCES

### 1. Tribal Cultural Resources

**Threshold A:** Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

- (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Finding: Less than significant with mitigation. (DEIR, pp. 4.17-7 – 4.17-9.)

Explanation: None of the previous cultural resources investigations identified Tribal Cultural Resources determined to be eligible for the CRHR or of significance pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. The only artifact of Native American origin previously identified within the Project is a single, isolated granitic ground stone fragment located along the former Riverside Lower Canal alignment. Pursuant to Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f), mitigation measures **MM-CUL-3** and **MM-CUL-4** require cultural resources monitoring for ground-disturbing activities in native soils in proximity to the known alignment of the Riverside Lower Canal to ensure any unanticipated archaeological discoveries are managed in accordance with CEQA guidelines. Additionally, at a programmatic level, **MM-CUL-5** requires all future development within the Project to protect cultural resources by temporarily halting ground disturbing activities and consulting with a qualified archaeologist in the event of an unanticipated cultural resources encounter. Additionally, the Project incorporates self-mitigating project design features providing specific requirements, such as compliance with Title 20 of the RMC, to be met for all subsequent development projects, including reuse, repurpose, or demolition, pertaining to historical resources within the Project. Impacts to Tribal Cultural Resources determined to be eligible for the CRHR or of significance pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 would be less than significant with implementation of **MM-CUL-3**, **MM-CUL-4**, and **MM-CUL-5**, as well as incorporation of project design features. (DEIR, p. 4.17-8.).

**MM-CUL-3**, **MM-CUL-4**, and **MM-CUL-5**, are contained in their entirety in Section 4.2, C. Cultural Resources, Threshold B.

## 4.3 Findings Regarding Significant and Unavoidable Impacts

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR, the following impacts from the Project and related approvals cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

### A. TRANSPORTATION/TRAFFIC

#### 1. Applicable Plans, Ordinances, and Policies Establishing Performance Measures of Effectiveness

**Thresholds A:** Would the project 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?

**Thresholds B:** Would the project 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?

**Finding:** Significant and unavoidable until improvements to SR-91 freeway ramps and related roadway segments are constructed; significant and unavoidable for three intersections on Magnolia Avenue and five segments of Magnolia Avenue consistent with the City policy; and significant and unavoidable for one segment of Adams Street due to roadway widening constraints from existing homes and a church. (DEIR, pp. 4.16-18 - 4.16-32.)

**Explanation:** A Project-specific Traffic Impact Analysis (TIA, or “traffic study”) was prepared to assess traffic conditions in the vicinity of the proposed Project under a variety of future development scenarios. Implementation of the Project will introduce additional traffic to the study area. With implementation of Mitigation Measures **MM TRA-1** through **TRA-8**, all study area intersection levels of service (LOS), intersection queues, roadway segment LOS, and freeway merge/diverge location LOS will operate at an acceptable LOS when Project-related traffic is added to the existing traffic, traffic from ambient growth and cumulative projects, and General Plan Buildout traffic forecasts from the County of Riverside’s RivTam model Year 2035 except for the following (DEIR, pp. 4.16-19 - 4.16-20, 4.16-22, 4.16-24 - 4.16-25, and 4.16-27 - 4.16-29.):

#### Intersection Levels of Service:

- Adams Street/SR 91 WB Ramps (Existing + Project, Existing + Ambient + Cumulative + Project, and General Plan Buildout scenarios);

- Adams Street/SR 91 EB Ramps (Existing + Project, Existing + Ambient + Cumulative + Project, and General Plan Buildout scenarios);
- Adams Street/Magnolia Avenue (General Plan Buildout scenario);
- Magnolia Avenue/Monroe Street (General Plan Buildout scenario); and
- Magnolia Street/Jefferson Avenue (General Plan Buildout scenario).

Project traffic added to the three analysis scenarios produces a LOS impact at the Adams Street/SR-91 WB Ramps and Adams Street/SR-91 EB Ramps intersections. The Project contributes to a LOS reduction at these intersections. Improvements to these intersections are being studied by the City and Caltrans as part of the SR-91/Adams Street Project Study Report (PSR). Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts to the two SR-91 Ramps at Adams Street intersections are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans. (DEIR, pp. 4.16-19, 4.16-22, and 4.16-27.)

Project traffic added to the General Plan Buildout scenario produces a LOS impact at the Adams Street/Magnolia Avenue, Magnolia Avenue/Monroe Street, and Magnolia Avenue/Jefferson Avenue intersections. Improvements to these intersections are limited due to the City's policy regarding widening of Magnolia Avenue. The Magnolia Avenue corridor is anticipated to operate at an LOS E as a 4-lane Special Boulevard in the General Plan Buildout condition. The Magnolia Avenue Specific Plan states the integration of a rapid bus transit system is a consideration for the reduction of traffic volumes along the Magnolia Avenue corridor. In light of this information, the intersections could operate at acceptable levels of service once this system is in place and make mitigation unnecessary. However, lacking any reasonable and feasible mitigation, traffic impacts at these three intersections remain significant and unavoidable. (DEIR, p. 4.16-27.)

#### **Intersection Queues:**

- Adams Street/SR 91 WB Ramps (Existing + Project, Existing + Ambient + Cumulative + Project, and General Plan Buildout scenarios);
- Adams Street/SR 91 EB Ramps (Existing + Project, Existing + Ambient + Cumulative + Project, and General Plan Buildout scenarios); and
- Adams Street/Indiana Avenue (Existing + Project, Existing + Ambient + Cumulative + Project, and General Plan Buildout scenarios).

Project traffic added to the three analysis scenarios produces queuing deficiencies in the form of at least one turn movement queue that exceeds the existing pocket length at the Adams Street/SR-91 WB Ramps, Adams Street/SR-91 EB Ramps, and Adams Street/Indiana Avenue intersections. The Project creates or contributes to the queue length exceedances at these intersections which is

considered to be a significant impact. Improvements to all three of these intersections are being studied by the City and Caltrans as part of the SR-91/Adams Street PSR. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts to the two SR-91 Ramps at Adams Street and Adams Street/Indiana Avenue intersections are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans. (DEIR, pp. 4.16-19, 4.16-22, and 4.16-27.)

### **Roadway Segments:**

- Adams Street: Between SR-91 WB and EB Ramps (Existing + Ambient + Cumulative + Project, and General Plan Buildout scenarios);
- Magnolia Avenue: Between Jefferson Street and Jackson Street (General Plan Buildout scenario); and
- Adams Street: Between Garfield Street and Magnolia Avenue (General Plan Buildout scenario).

Project traffic added to the Existing + Ambient + Cumulative and General Plan Buildout scenarios produces a LOS impact at the roadway segment on Adams Street from the SR-91 WB to the EB Ramps. The Project contributes to a LOS reduction at this roadway segment. Widening of Adams Street may be considered as part of the SR-91/Adams Street PSR, although the specific design of the improvements has not taken place. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans. (DEIR, pp. 4.16-24 and 4.16-27.)

Project traffic added to the General Plan Buildout scenario produces a LOS impact at five roadway segments on Magnolia Avenue from Jefferson Street to Jackson Street and the segment on Adams Street from Garfield Street to Magnolia Avenue. The Project contributes to a LOS reduction at these roadway segments. Improvements to Magnolia Avenue are limited due to the City's policy regarding widening of Magnolia Avenue. The Magnolia Avenue corridor is anticipated to operate at an LOS E as a 4-lane Special Boulevard in the General Plan Buildout condition. The Magnolia Avenue Specific Plan states the integration of a rapid bus transit system is a consideration for the reduction of traffic volumes along the Magnolia Avenue corridor. In light of this information, the intersections could operate at acceptable levels of service once this system is in place and make mitigation unnecessary. However, lacking any reasonable and feasible mitigation, traffic impacts at these three intersections remain significant and unavoidable. The feasibility of widening Adams Street between Garfield Street and Magnolia Avenue to 6 lanes to mitigate the roadway segment LOS deficiency is limited by existing homes and a church. For this reason, widening to a 6 lane

roadway is not feasible and therefore impacts would remain significant and unavoidable. (DEIR, pp. 4.16-28, 4.16-29.)

#### **Freeway Ramp Merge/Diverge Locations:**

- SR 91 EB On-ramp at Adams Street (Existing + Project, and Existing + Ambient + Cumulative scenarios).

Project traffic added to the Existing and Existing + Ambient + Cumulative scenarios contributes to a LOS impact at the SR 91 EB On-ramp at Adams Street freeway merge/diverge location. To improve freeway operations, capacity-enhancing mainline lane improvements would be required. These freeway facilities are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is available. Although the SR-91/Adams Street PSR may lead to auxiliary or mainline lane improvements near that Adams Street interchange that might improve merge/diverge LOS, the specific design of the improvements has not taken place. Since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither the City nor the Project proponent can contribute fair share fees or implement the required improvements. This impact is therefore considered to be significant and unavoidable. (DEIR, pp. 4.16-20, and 4.16-25.)

The following mitigation measures will be implemented:

**MM TRA-1:** Prior to the issuance of the first building permit, CBU shall construct Lancer Lane at Adams Street to include 2 inbound lanes and 3 outbound lanes having turning movements as approved by the City Traffic Engineer (1 left-turn lane, 1 through lane, 1 right-turn lane). The NB approach on Adams Street will be widened to include a second left turn lane, and provide 250 feet of storage for the left-turn lanes. The SB approach on Adams Avenue will be widened to include an additional thru lane. This internal roadway will continue to connect to Magnolia Avenue, and will serve as the primary internal roadway to the campus.

**MM TRA-2:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 13.65%, for the following improvements to the Adams Street/Magnolia Avenue intersection:

- Adams Street southbound approach – restripe to include 2-300 foot left-turn lanes within the existing roadway.
- Adams Street northbound approach – restripe to include 2-240 foot left-turn lanes within the existing roadway.
- Magnolia Avenue eastbound approach – modify the existing raised median to provide 265 feet of storage.
- Magnolia Avenue westbound approach – modify the existing raised median to provide 365 feet of storage.

**MM TRA-3:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 18.49%, for the following improvements to the Monroe Street/Magnolia Avenue intersection:

- Monroe Street northbound approach – restripe to include 1-410 foot left-turn lane within the existing roadway.
- Monroe Street southbound approach – restripe to include 1-215 foot left-turn lane within the existing roadway.
- Magnolia Avenue eastbound approach – modify the existing raised median to provide 240 feet of storage.
- Magnolia Avenue westbound approach – modify the existing raised median to provide 430 feet of storage.

**MM TRA-4:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 43%, to construct an exclusive eastbound right-turn lane with a minimum storage length of 100 feet on Magnolia Avenue at Adams Street and modifications to the signal phasing to include a right-turn overlap with the northbound left-turn phase.

**MM TRA-5:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 14.50%, for the following improvements to the Adams Street/Garfield Avenue intersection:

- Garfield Street northbound approach – restripe to include 1-115 foot left-turn lane within the existing roadway.

**MM TRA-6:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 11.01%, for the following improvements to the Magnolia Avenue/Jefferson Street intersection:

- Jefferson Street northbound approach – restripe to include 1-175 foot left-turn lane within the existing roadway.
- Jefferson Street southbound approach – restripe to include 1-200 foot left-turn lane within the existing roadway.

**MM TRA-7:** Prior to the issuance of the certificate of occupancy of the East Parking Structure, installation of curb and gutter at 53 feet from monument centerline, sidewalk and matching paving on Adams Street from Lancer Lane/Briarwood Drive to the westbound 91 freeway on-ramp is required. The City has determined that the required

improvements shall terminate at the Diana Avenue monument centerline along the Shell Gas Station's Adams Street frontage.

**MM TRA-8:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 6.67%, for the following improvements to the Magnolia Avenue/Monroe Street intersection:

- Monroe Street northbound approach – restripe to include 1-410 foot left-turn lane within the existing roadway.
- Monroe Street southbound approach – restripe to include 1-215 foot left-turn lane within the existing roadway.
- Magnolia Avenue eastbound approach – modify the existing raised median to provide 240 feet of storage.
- Magnolia Avenue westbound approach – modify the existing raised median to provide 430 feet of storage.

## **4.4 Findings Regarding Cumulative Impacts**

Consistent with CEQA's requirements, the EIR includes an analysis of cumulative impacts, which include the impacts of the Project plus all other pending or approved projects within the affected area for each resource. Where evaluation of potential cumulative impacts are located (e.g., noise, traffic, visual quality, biological, cultural resources, and public utilities) the analysis is based on a list of past, present, and probably future projects producing related or cumulative impacts. (See, DEIR, Table 6-A.) For potential cumulative impacts that are regional in scope (e.g., air quality and global warming/GHGs), planning documents were used to determine cumulative impacts. (DEIR, p. 6-2.)

### **A. Aesthetics**

Cumulative impacts refer to incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. In this case, the proposed Project is the CBUSP Amendment, which serves as an assessment of various potential cumulative impacts from future development. For context, the cumulative "universe" for impacts to aesthetic (visual or lighting) resources relative to the CBUSP Amendment would be the City of Riverside, which includes views of hills and ridgelines such as La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, Box Springs Mountain, Mt. Rubidoux, Arlington Mountain, and the hills of Alessandro Heights as visual backdrops to future development. (DEIR, p. 6-3.)

By its very nature, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure it does not result in significant impacts to scenic resources or results in a substantial increase in lighting or glare. Cumulatively, higher intensity land uses and more lighting would be introduced into the area as a result of the projected increase in student population and growth of the campus, as well as



from development surrounding the CBU Specific Plan Zone. Although the CBUSP Amendment cannot administer development standards outside of its jurisdiction, it would reduce its incremental contribution to cumulative aesthetic-related impacts from development within the CBU Specific Plan Zone to less than significant levels by implementing various design oriented policies contained in the CBUSP. (DEIR, p. 6-4.)

The development standards and design guidelines contained in the CBUSP Amendment will ensure light sources from its implementation will not result in significant glare or adversely affect day or nighttime views in the area. General lighting guidelines in the CBUSP Amendment recommend concealed light sources to minimize glare. Additionally, outdoor lighting must be focused, directed, and arranged to prevent glare and illumination on public streets and any adjacent properties not owned by CBU. As necessary for each increment of development resulting from implementation of the CBUSP Amendment, photometric light studies will be submitted by CBU and approved by planning staff to ensure no light spillage onto public right-of-way or adjacent properties. High intensity lights are not permitted, except for use on athletic fields and student recreation facilities. (DEIR, p. 6-5.)

All future development administered by CBU will be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the objectives and policies of the of the CBUSP Amendment and the *General Plan 2025* prior to permit issuance. Implementation of the proposed CBUSP Amendment will add to the cohesion of the existing area, including the *Magnolia Heritage District* of the Magnolia Avenue corridor, by protecting and enhancing the visual and historic qualities of CBU and the surrounding community. The programmatic policies, development standards and design guidelines incorporated into the CBUSP Amendment will help reduce impacts of individual development projects within the CBU Specific Plan Zone to less than significant levels. Therefore, the CBUSP Amendment would make a less than significant contribution to cumulatively considerable aesthetic impacts within the City. No mitigation is required. (DEIR, p. 6-5.)

## **B. Agriculture and Forestry Resources**

The universe for cumulative agricultural and forest resource impacts is western Riverside County. The western portion of the County is generally transitioning away from agriculture, while the eastern portion of the County (e.g., Coachella Valley) is more largely rural and still supports extensive agriculture. The State Department of Conservation, Office of Land Conservation, publishes a Farmland Conversion Report every two years as part of its FMMP. These reports document land use conversion by acreage for each California county. The most recent data are for the 2014-2016 period, during which western Riverside County experienced a net loss of approximately 100 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and approximately 2,830 acres of Farmland of Local Importance (total loss equals approximately 2,930 acres). (DEIR, pp. 6-6.)

The loss of approximately 100 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and approximately 2,830 acres of Farmland of Local Importance (total loss equals approximately 2,930 acres) is an incremental but potentially significant loss of agricultural soils in western Riverside County. However, as detailed in Section 4.2.5, implementation of the CBUSP Amendment would not contribute to any loss of Prime Farmland, Unique Farmland, or

Farmland of Statewide or Local Importance. Additionally, the Project site does not contain agricultural or forest land or land administered under Williamson Act contracts. Implementation of the CBUSP Amendment does not include development within CBU's open space footprint, and there is no proposed increase in utilization of land within the CBU Specific Plan Zone through the expansion of the development footprint within CBU's existing open space area. Therefore, the proposed Project will have no impact cumulatively to loss of agriculture and/or farmland (including any forest-related resources). No mitigation is required. (DEIR, p. 6-6.)

### **C. Air Quality**

Due to the defining geographic and meteorological characteristics of the Basin, the cumulative area for air quality impacts is the Basin itself. As discussed in Section 4.3 (Air Quality, Related Regulations, Criteria Air Pollutants), the portion of the Basin within which the City is located is designated as a non-attainment area for ozone, O<sub>3</sub>, NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> under State Standards; and for ozone and O<sub>3</sub> and PM<sub>2.5</sub> under both federal standards. Project emissions within the context of SCAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts within the Basin. Cumulative localized impacts for pollutants are also considered and reflect Project air pollutant emissions in the context of ambient conditions in the Project vicinity. As discussed in Section 4.3.5 (Air Quality, Environmental Impacts before Mitigation), Section 4.3.7 (Environmental Effects after Mitigation Measures are Implemented), and the CBUSP Amendment CalEEMod Emissions Estimates, LST Analysis, the Project's short-term and long-term emissions will not exceed the SCAQMD thresholds. (DEIR, pp. 6-6 – 6-7.)

The SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. The project would not emit any criteria air pollutants above regional significance. In addition, the project has also been determined to be consistent with the AQMP, since it is consistent with the underlying land use as determined by the CBUSP. Therefore, with implementation of Mitigation Measures (MM) **AQ-1** through **AQ-10**, implementation of the CBUSP Amendment will not make a significant contribution to cumulatively adverse impacts to air quality. No additional mitigation is required. (DEIR, pp. 6-6 – 6-7.)

### **D. Biological Resources**

The universe for cumulative impacts to biological resources relative to the CBUSP Amendment is western Riverside County, which would take into account the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), for which the City is a Permittee. Additionally, the Project is within the Stephens Kangaroo Rat Habitat Conservation Plan (SKRHCP) mitigation fee area; therefore, the proposed Project is required to comply with applicable provisions of the SKRHCP.

The CBU campus is fully developed and surrounded by urban uses. By its very nature, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure its implementation does not result in significant impacts to biological resources. The CBUSP Amendment includes development standards, design guidelines, and implementation methods to ensure CBU's open space network is maintained and improved as a distinguished and functional component of CBU. CBU has also developed the CBU Tree Campus USA Urban Forest Management Guidelines to manage landscaping within the campus. Under a more urban-intensity model, CBU may modify internal

open space areas and balconies of residential apartment complexes that would be transitioned to traditional student residences, which could include reducing individual open space areas, in order to reflect a development character more suitable to student life.

CBU's open space network consists of the Magnolia Lawn, Stamps Courtyard, Harden Square, a water quality detention basin, the athletic fields, and a network of smaller courtyards, plazas, and lawns that surround and are incorporated into the student housing areas. Total vegetation cover on the Project site is approximately 15 percent consisting of grassy athletic fields and open space lawns, ornamental trees, shrubs, and planters, and a constructed storm water detention basin with potential to support riparian/riverine resources. However, minimal native vegetation remains within the Project site or surrounding properties.

Development standards of the CBUSP Amendment are intended to accommodate recreation and intramural activities at open space areas throughout the campus, as determined by the campus intramural and athletic department's needs, and maintain an open space axis that connects the Magnolia Lawn/water quality detention basin to Lancer Commons. Additional plazas will be located in the interior portion of campus to create a strong campus identity. Landscape plans will meet the landscaping requirements described in the design guidelines of the CBUSP Amendment and will be reviewed at the time of Site Plan and Design Review (as applicable) and will be consistent with the Open Space Guidelines of the Specific Plan. The perimeter of the campus will have a formalized landscape treatment that unifies the contiguous campus boundaries. The treatment will vary to accommodate existing structures and planned development. Where no existing or planned open space facilities are provided, the buffer will be consistent with the greenway buffers described for each of the boundary roadways (Magnolia Avenue, Adams Street, and Monroe Street). A landscaped buffer treatment will be provided around all parking structures to soften the impact of the structure, shown in detail in Chapter 7 of the CBUSP Amendment. Landscaped treatments within parking lots will include islands and tree wells to ease vehicular and pedestrian circulation and to provide shade. The landscape treatment along Magnolia Avenue will remain compatible with the Magnolia Avenue Specific Plan, and has already been established along Magnolia Avenue. Together, the development standards and design guidelines of the CBUSP Amendment would ensure CBU's open space network is preserved and enhanced throughout Specific Plan implementation.

At a programmatic level the CBUSP Amendment would be implemented in accordance with the County's MSHCP and SKRHCP, and the CBU Tree Campus USA Urban Forest Management Guidelines. Implementation of **MM-BIO-1** and **MM-BIO-2** would ensure impacts to biological resources from implementation of the CBUSP Amendment would be reduced to less than significant levels. Together these programmatic actions would reduce impacts of individual development projects within the CBU Specific Plan Zone to less than significant levels.

It should also be noted that the County's MSHCP and SKRHCP are regional mitigation plans for regional or potential cumulative impacts to biological resources. Implementation of project-level mitigation measures in the MSHCP and SKRHCP, including payment of regional impact fees, will help ensure that potential regional (i.e., cumulative) impacts of future development within the CBU Specific Plan Zone are reduced to less than significant levels.

For these reasons, implementation of the CBUSP Amendment will not make a significant contribution to cumulatively adverse impacts to biological resources, and no additional mitigation is required. (DEIR, pp. 6-8 – 6-9.)

## **E. Cultural Resources**

The universe for cumulative impacts to cultural resources relative to the CBUSP Amendment is the City of Riverside. Past, present, and reasonably foreseeable future projects in the City would similarly include redevelopment of existing facilities and/or ground-disturbing activities with the potential to destroy, damage, or displace surface or previously undiscovered subsurface archaeological and historic resources; therefore, the proposed Project, in combination with the identified cumulative projects, has the potential to result in a significant cumulative impact.

By its very nature, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure it does not result in significant impacts to cultural resources. Cumulatively, repurposing, modifying, or replacing historic buildings; constructing new facilities; and generally implementing higher intensity land uses have the potential to adversely impact cultural resources. However, development standards outlined in Table 4.5.A, Disposition of Properties Surveyed for Historic Significance, of the Draft EIR in addition to the objectives and policies, development standards, design guidelines, and implementation methods presented in the CBUSP Amendment incorporate self-mitigating project design features required for all future development and improvement projects to or in proximity to historical resources.

Unless specifically defined as a resource contributor, modifications subject to environmental review pertain only to those made to the exterior of a resource. Under CEQA, the demolition of a historical resource cannot be mitigated to a level of less than significant, so proposed demolition of historical resources would require an EIR as indicated in Table 4.5.A.

As self-mitigating project design features, the CBUSP Amendment implementation methods outlined in Section 4.5.4 of the Draft EIR provide specific requirements, such as compliance with Title 20 of the RMC, to be met for all future development projects, including reuse, repurpose, or demolition, pertaining to historical resources within the CBU Specific Plan Zone (Table 4.5.A). These self-mitigating project design features, in conjunction with mitigation measures **MM-CUL-1** and **MM-CUL-2** to address CBU's specific intent to relocate the Hawthorn House and conduct alterations to the Rose Garden Village, would reduce impacts to historical resources to less than significant levels.

Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f) recognize that historical or unique archaeological resources may be accidentally discovered during project construction. **MM-CUL-3** and **MM-CUL-4** require cultural resources monitoring for ground-disturbing activities in native soils in proximity to the known alignment of the Riverside Lower Canal to ensure any unanticipated archaeological discoveries are managed in accordance with CEQA guidelines. Additionally, at a programmatic level, **MM-CUL-5** and **MM-CUL-6** require all future development within the CBU Specific Plan Zone to protect cultural and paleontological resources by temporarily halting ground disturbing activities and consulting with a qualified archaeologist or paleontologist in the event of an unanticipated cultural or paleontological

resources encounter. Furthermore, although unlikely to occur, potential impacts associated with human remains would be reduced to a less than significant level through adherence to Section 7050.5 of the California Health and Safety Code and PRC Section 5097.

Similar to the proposed Project, it is reasonable to conclude that other projects in the City with a potential to cause impacts to archaeological, historic, or paleontological resources would each identify specific measures to reduce the significance of such impacts. Implementation of the programmatic actions and mitigation measures outlined in this Draft EIR, as well as the CEQA documents for other developments in the City, will reduce potential cumulative impacts to archaeological, historic, and paleontological resources to less than significant levels. For these reasons, implementation of the CBUSP Amendment will not make a significant contribution to cumulatively adverse impacts to cultural resources (with the recommended mitigation). No additional mitigation for cumulative impacts is required. (DEIR, pp. 6-9 - 6-10.)

## **F. Geology and Soils**

The cumulative area for geologic issues is the City of Riverside and Riverside County, within the larger context of southern California due to regional seismicity. The Project area has potential geotechnical and soils constraints, as the entire southern California area contains a number of major regional and local faults, including the Elsinore, San Jacinto, and San Andreas faults. The presence of regional faults and potential for seismic shaking create the potential for damage to structures or injury to persons during seismic events. However, city, county, and State regulations provide guidelines for development in areas with geologic constraints and ensure that the design of buildings is in accordance with applicable California Building Code (CBC) standards and other applicable standards, which reduces potential property damage and human safety risks to less than significant levels. Anticipated development in the City and surrounding area in general will not have a cumulatively considerable impact on earth resources, nor will regional geotechnical constraints have a cumulatively considerable impact on the proposed Project or cumulative projects, as long as proper design and engineering are implemented based on available seismic and other geotechnical data. The proposed Project represents only an incremental portion of this potential impact, with implementation of **MM-GEO-1**, the Project will not have cumulatively significant impacts in this regard.

Because it is reasonable to conclude that all development within seismically active areas will be required to adhere to applicable State regulations, CBC standards in effect at the time of submittal of development applications, and the design and siting standards required by local agencies, and with implementation of **MM-GEO-1**, the Project would not result in significant cumulative impacts regarding regional geology, seismicity, or soil constraints. (DEIR, p. 6-11.)

## **G. Greenhouse Gas Emissions**

Greenhouse gasses (GHG) are those gases that will contribute to global climate change; therefore, the cumulative impact area for GHG emissions is the earth's atmosphere. Implementation of the proposed Project along with the cumulative development projects will contribute GHG emissions to the atmosphere.

Despite the global nature of GHG impacts, it is important to note that the scope of the City's jurisdictional authority is limited to certain types of emissions generated within the City's physical boundaries. The City's authority does not include the regulation of the majority of actions, including for example transportation policy, fuel consumption, and energy generation, which the state has determined are necessary to meet all of AB 32's greenhouse gas reduction goals. Further, some of the GHG emissions are associated with the Project can be reduced only by measures to be implemented by other governmental agencies which are outside the City's jurisdiction. GHG emissions are clearly significant on a global basis, and when GHG emissions are outside of the lead agency's jurisdiction and control, consistent with CEQA Section 21081(a)(2), a project has cumulatively considerable significant and unavoidable GHG impacts if other agencies do not take necessary action.

However, the City has adopted a Climate Action Plan (CAP) to ensure that projects within the City will comply with all necessary policies to achieve a 15 percent reduction in GHG emissions by 2020 compared to a business as usual scenario. As described in Section 4.7, Greenhouse Gas Emissions, greenhouse gas emission modeling was used to predict the amount of greenhouse gasses the Project would generate. These models revealed that Project Design Features and **MM GHG-1** and **MM GHG-2** will reduce the predicted greenhouse gas emissions that would cause a significant impact on the environment to less than significant levels with mitigation. Additional cumulative development projects will also be subject to consistency analysis with the City's CAP as well as State and subregional policies that restrict greenhouse gas production. As these buildings, roads, or other cumulative developments are updated or replaced over time, they will be subject to the then-existing requirements for greenhouse gas emissions reductions, including those set forth to ensure compliance with Executive Orders S-3-05 and B-30-15, as described in Section 4.7, as well as then-existing technologies employed to achieve deep reductions in greenhouse gas emissions. Therefore, cumulative impacts to greenhouse gas emissions will be less than significant with mitigation from the proposed Project and other cumulative development projects within the City of Riverside. (DEIR, p. 6-11 - 6-12.)

## **H. Hazards and Hazardous Materials**

The Project would not result in significant cumulative impacts associated with the routine transport, use, and disposal of hazardous materials; the emission or handling of hazardous substances. Accidental spills and leaks are unplanned occurrences. It is impossible to predict the occurrences of such events and the likelihood of such events occurring in close proximity to each other at the same time is very small; therefore, such events cannot be considered cumulatively.

Pursuant to California Health and Safety Code Section 25507, CBU has established and implements a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material in accordance with Section 25503. Specifically, CBU developed its Hazardous Material & Hazardous Waste Maintenance Program to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site. The plan is constantly updated and outlines proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an updated spill contingency plan, outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol. The step by step procedures for initial spill response and reporting requirements were developed during exploration for employees and

contractors to reference in the event of a spill. This plan was developed to educate employees/contractors to promote spill prevention and minimize spill occurrences.

Implementation of mitigation measures **MM HAZ-1**, **MM HAZ-2**, and **MM HAZ-3** would require site-specific Phase I Environmental Site Assessments; lead-based paint, asbestos, and/or pesticide testing; and coordination with the Riverside County Airport Land Use Commission to reduce cumulatively-considerable Project-related impacts to less than significant levels. Furthermore, implementation of policies and adherence to standards mandated by the City, including the enforcement of existing local, State, and federal practices applicable to businesses that transport, sell, or use hazardous materials, would ensure that no cumulative impact would result from the construction and operation of the proposed Project.

Similar to the Project, development of other planned projects within the City of Riverside would be required to adhere to the existing laws and regulations regarding the use, storage, transport, or disposal of hazardous materials and waste. Moreover, with implementation of mitigation, the Project would not result in any safety hazards related to nearby airports, airstrips, adopted emergency response plans, or wildland fire hazards. The Project would not combine with other projects to result in a cumulatively considerable impact with respect to these potential hazards. In addition the project would be consistent with General Plan policies. Therefore, the Project will not make a significant contribution to any cumulatively considerable impacts related to hazardous materials, hazardous waste, or the creation of any health hazards. (DEIR, p. 6-12 - 6-13.)

## **I. Hydrology/Water Quality**

The cumulative area for hydrology and water quality is the Santa Ana Watershed. Cumulatively, development within the watershed will result in an increase in impervious surfaces, changes in the type and density of land use, and corresponding changes in the amount and characteristic of runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology and increase potential pollutant loads. However, all future development in the City and throughout the Santa Ana Watershed will be required to comply with the applicable requirements of the NPDES permit program and water quality standards defined by local, regional, State and federal agencies. Continued growth is anticipated to occur in the City and surrounding areas, and all new development and significant redevelopment will be required to minimize its individual impacts to water quality and pollutant transport through implementation of BMPs. Therefore, since all new developments will be required to mitigate for impacts to water quality, a less than significant cumulative impact to water quality will occur.

Cumulatively, continued development within the Riverside County will put additional pressure on water supplies from the local groundwater basins, including the Lytle Creek, Rialto/Colton, Bunker Hill, North Riverside, South Riverside, Arlington, and Chino Basins. CBU owns and operates two on-site wells used for irrigation purposes only. The wells are equipped with 60-horsepower pumps with an approximate maximum capacity of 265 gallons per minute, and CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields.

CBU maintains an “overlying water right” to pump groundwater from the Riverside-Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. CBU’s wells have been designed

and constructed in accordance with Section 13801 of the California Water Code (CWC), Chapter 6.28 of the RMC, and the provisions of City Resolution No. 14733. Pursuant to the CWC, CBU files an annual notice of its groundwater use with the California State Water Board and/or Riverside Public Utilities Department (RPU), thereby maintaining private water rights for the use of their on-site wells.

For regulatory purposes, the Santa Ana Regional Water Quality Control Board (RWQCB) designates Groundwater Management Zones. The CBU Specific Plan Zone is within the Arlington Groundwater Management Zone of the Middle Santa Ana River Basin and within the Riverside-Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. While the Riverside South subbasin is adjudicated, the Arlington subbasin is not. Extractions from the Riverside South basin are managed by the Watermaster to ensure water levels at index wells within the basin remain above threshold levels.

Through the process of groundwater basin adjudication, it is reasonable to conclude that groundwater extraction by CBU and RPU would not exceed the safe yields adjusted annually by the Watermasters of each adjudicated basin. Through compliance with Section 13801 of the CWC, Chapter 6.28 of the RMC, and the provisions of City Resolution No. 14733, groundwater withdrawal resulting from the development of the Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a cumulatively considerable net deficit in aquifer volume or a lowering of the local groundwater table level.

The proposed Project will make an incremental contribution to production of urban pollutants, but the site-specific water quality BMPs will help ensure that these contributions will not make a significant contribution to any cumulatively considerable regional water quality impacts. To reduce flows to the regional storm drain system and capture drainage for beneficial reuse, design features will be integrated in all new campus development to promote infiltration and provide for water quality treatment. These improvements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

The drainage system for the proposed Project will be designed so that peak flows from post-development runoff are captured by landscape features and infiltration basin BMPs, and treated prior to eventual discharge into the Santa Ana River. Therefore, the Project will not result in a local or regional cumulatively significant impact related to capacity of drainage systems. CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to hydrology and water quality has been found to be potentially significant, no mitigation measures are required. Adherence to standard procedures, including compliance with the requirements of the Construction General Permit, Groundwater Discharge Permit, Riverside County MS4 Permit, construction and operational BMPs, and Riverside Municipal Code (RMC) will ensure all cumulative impacts related to hydrology and water quality are less than significant. (DEIR, p. 6-13 - 6-15.)



## **J. Land Use and Planning**

Land use and planning decisions for the cumulative development projects fall within the jurisdiction of the City of Riverside. As with the proposed Project, all of the cumulative development projects are required to comply with applicable land use plans and policies of the applicable jurisdiction. Accordingly, a project cannot be approved that is not consistent with the City's *General Plan 2025* or the zoning ordinance of the City unless amendments, variances, or exceptions are proposed and adopted as part of the project. The proposed Project is located within the California Baptist University Specific Plan (CBUSP). As described in Chapter 2 – Project Description, the Project proposes an amendment to the CBU Specific Plan that was approved in 2013. As detailed in Section 4.10.5, implementation of the proposed Project was determined to have a less than significant impact on the environment related to land use and planning. The proposed Project was found to be consistent with the applicable policies and guidelines of the City's *General Plan 2025*, the Southern California Association of Governments (SCAG) 2016/2040 Regional Transportation Plan - Sustainable Communities Strategy (RTP-SCS), RMC regarding processing of an amendment to the 2013 CBUSP, and the Riverside County MSHCP and SKRHCP. Therefore, the Project's contribution to conflicts with applicable land use plans, policies, or regulations is not considerable, and cumulative impacts in this regard are not significant.

The Project will not divide an established community because it would be commensurate with the existing on-campus and surrounding land uses, which are academic, mixed use, and high-density residential in nature, and therefore integrate uniformly with the established community. Therefore, the Project's contribution to physically dividing an established community is not considerable, and cumulative impacts in this regard are not significant.

The proposed Project and cumulative development projects are subject to the provisions of the Western Riverside MSHCP and the SKRHCP. Each of the cumulative projects would be required by the City of Riverside to conduct surveys and mitigate for impacts to loss of sensitive habitats and species in accordance with the provisions of the MSHCP and the SKRHCP. Project developers are also required to contribute mitigation fees identified in the MSHCP and the SKRHCP, in support of continued implementation of the plans. Because compliance with these plans reduces impacts to less than cumulatively considerable levels, cumulative impacts are not significant. (DEIR, p. 6-15 - 6-16.)

## **K. Mineral Resources**

Mineral resources are considered a State wide resource; therefore, the geographic scope for mineral resources is the State. A cumulative impact on mineral resources would occur if the proposed Project and cumulative development projects would contribute to the loss of availability of significant aggregate reserves. The Project site and cumulative development projects are located within the western half of the City not within a mineral resource area. There are no known mineral resources on the Project site. Given the current zoning designations of the Project site and the cumulative development projects, the amount of existing industrial, commercial, and residential development surrounding the Project site and the undeveloped cumulative project sites, it is highly unlikely that any surface mining or mineral resource recovery operation could feasibly take place.

Therefore, no potentially significant cumulative effects related to mineral resources will result from the proposed Project. (DEIR, p. 6-16.)

## **L. Noise**

The geographic scope for noise impacts associated with on-site construction and operations is the immediate vicinity of the Project site because noise by definition is a localized phenomenon, and drastically reduces in magnitude as the distance from the noise sources increases. Consequently, only those cumulative development projects within the immediate vicinity of the proposed Project will be likely to contribute to cumulative noise impacts resulting from Project construction or operation. Only one of the cumulative development projects is within 0.50 mile of the Project site; Classroom and Laboratories, P14-0450, revised Conditional Use Permit to establish classrooms and laboratories within 5 office and warehouse lease spaces; 9,085 square feet; for California Baptist University. (Figure 6-1 – Cumulative Development Location Map).

Construction noise would result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Although, construction noise is exempt from the City's noise standards when activities occur between the permitted hours, construction could still result in disturbances to noise-sensitive receptors in a project's vicinity, resulting in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. To ensure maximum reduction in temporary or periodic increase in ambient noise levels generated by construction activities, standard best management construction noise reduction measures shall be implemented, as identified as mitigation measure **MM-NOI-1**.

Given the separation between the proposed project site and cumulative project sites, construction and on-site operations would be considered point sources of noise and would not contribute to off-site cumulative noise impacts from other planned and future cumulative projects. Implementation of the proposed project and cumulative projects would result in the introduction of new noise sources and levels from on-site activities and from increased traffic volumes on local roadways. The geographic scope for noise impacts associated with Project-generated vehicular noise is the roadways that will be used by Project-generated traffic in combination with traffic from the cumulative development projects. As shown in Table 4.12-H – Existing Traffic Noise Levels Without and With Project (existing traffic volumes, existing plus ambient traffic volumes, and General Plan Buildout) at 50 Feet from Centerline, the Project's largest increase in traffic noise would be within subarea CBUSP-1 of the CBU Specific Plan Zone on Lancer Lane between Campus Bridge Drive and Adams Street. Lancer Lane could result in an up to a 7.2 dBA increase over existing conditions. This noise level would exceed the 3 dBA increase considered to be perceptible by the human ear in an outdoor environment. However, the resulting noise level along Lancer Lane would be approximately 56.2 dBA CNEL, which would be lower than existing noise associated with other surrounding roadways and would be within the normally acceptable range for residential and school land uses. The second largest noise level increase would be on Campus Bridge Drive between Magnolia Avenue and Lancer Lane, with an approximately 2 dBA increase over existing conditions. This noise level is less than the 3 dBA increase considered to be perceptible by the human ear in an outdoor environment and the resulting noise level would be 57.2 dBA CNEL, which is lower than existing noise associated with other surrounding roadways and is within the normally acceptable range for residential and school land uses. Therefore, cumulative impacts with regard to traffic noise are not significant.

Operational noise will exceed the daytime interior noise standards of 45 dBA CNEL (7:00 a.m. to 10:00 p.m.). A heating, ventilation, and air-conditioning (HVAC) system would allow for windows to be closed in order to reduce noise levels for students and faculty to meet the City's normally acceptable interior noise level criterion of 45 dBA CNEL. **MM-NOI-2** would require a project-specific acoustical study to determine specific insulation and other structural requirements such as an HVAC system to allow all windows to remain closed to reduce interior noise levels below the 45 dBA CNEL thresholds. To meet the interior nighttime noise level, any residential uses developed under the CBUSP Amendment within areas of the CBU Specific Plan Zone with noise levels greater than 60 dBA CNEL shall include a project-specific acoustical study to determine specific insulation and other structural requirements, in accordance with **MM-NOI-2**.

The normally acceptable exterior noise level for single-family residential uses is up to 60 dBA CNEL, and noise levels of 60 to 65 dBA CNEL are conditionally acceptable when noise insulation features are included in the design to meet the interior noise standard. Exterior noise levels within the CBU Specific Plan Zone are expected to reach approximately 68.7 dBA CNEL. The 68.7 CNEL is within the City's conditionally acceptable noise level for school uses; however, this noise level would exceed the City's conditionally acceptable noise level for single-family residential land uses. Implementation of MM-NOI-2 would be required to ensure that projects developed under the proposed CBUSP Amendment would meet the City's land use compatibility standards.

Stationary sources within the campus include parking lot activities, HVAC systems, and athletic and performance art/amphitheater events. The nearest sensitive receptor at approximately 10 feet from the parking lots would be exposed to a noise level of 74 to 84 dBA Lmax generated by parking lot activities. Because parking lot activity is intermittent throughout the day and each time would last less than one minute, parking lot noise is not expected to cause an increase in noise levels of more than 3 dBA and would not contribute significantly to the CNEL level in the project vicinity. However, because specific land uses and placement is unknown at this time, **MM-NOI-3** shall be implemented to ensure implementation of the CBUSP Amendment would not expose persons to noise levels in excess of City's General Plan or RMC.

For purpose of this analysis, 75 dBA at 3 feet was assumed to represent HVAC related noise. At 10 feet from point source, the closest off-site noise-sensitive receptors would be exposed to a noise level of 65 dBA Lmax generated by HVAC equipment. The 65 dBA Lmax would exceed the City's exterior noise standard during daytime and nighttime at residential land uses. In order to reduce noise levels associated with HVAC equipment, **MM-NOI-4** would require design consideration and shielding to be implemented. Because noise is such a localized phenomenon cumulative impacts with regard to operational noise are not significant.

On-site operational noises are individual occurrences and are not typically additive in nature. Noise sources would have to be adjacent to or in close proximity to one another in order for individual noise sources to intermingle. Similarly, noise receivers would also have to be adjacent to or in close proximity to the noise generators. None of the cumulative projects listed in Table 2.A are in close enough proximity for their operational noise generation to comeingle with the proposed project's operational noise generation. In addition, it is reasonable to conclude the owner/operator/occupant of adjacent properties would adhere to applicable provisions of the City's Municipal Code and General Plan related to operational and nuisance noise from their respective properties. Therefore, through implementation of CBU design elements that guide subsequent

development to be sensitive to noise-sensitive receptors, in conjunction with mitigation measures **MM-NOI-1** through **MM-NOI-4** are proposed to minimize disturbances to nearby sensitive receptors during construction and implementation/operation of the proposed Project. With implementation of the CBUSP Amendment project design elements in conjunction with **MM-NOI-3** through **MM-NOI-4**, the cumulative nature of operational noise from the project and other cumulative development would be less than significant. No additional mitigation is required. (DEIR, pp. 6-16 - 6-19.)

## **M. Population and Housing**

The cumulative impact area for population and housing is the City. Implementation of the proposed Project and cumulative development projects could contribute to significant cumulative impacts to population and housing if they would induce substantial population growth or displace substantial numbers of existing housing units requiring the construction of replacement housing. The University anticipates an enrollment goal of 12,000 students (7,201 traditional students) in 2025. Additionally, the projected enrollment would require an increase in facility/staff positions from 757 positions in 2015 to 1,080 positions by 2025, a potential increase of up to 323 jobs in the City.

It is not certain if future enrollment will increase the population of the City. If students already live locally, they would be included in the existing SCAG growth forecasts. In the unlikely event all new students originate from outside the City, the forecast enrollment could increase the City's population by 3,578 (a 1.0 percent over 2017 estimates). Any increase in population resulting from development pursuant to the CBUSP is consistent with existing and future population forecasts and would not significantly (directly or indirectly) increase population growth in the City or region.

The cumulative residential development projects identified in Table 6.3.A – Cumulative Development Projects represent a total of 62 condominiums expected to generate approximately 207 future residences in the City, based on a household size of 3.34 persons per residence. As detailed in Section 4.13.1 of this EIR, there were 92,400 households in the City in 2012, with 118,600 households projected in 2040, and the population in the City was 310,700 in 2012 and is projected to be 386,600 in 2040. The proposed Project in conjunction with the anticipated increase in population from the cumulative residential development project would generate an additional 3,785 persons in the City and would represent an increase of approximately 4.1 percent over the 2012 population and approximately 3.2 percent of the population forecast for 2040.

The cumulative development projects will create temporary employment opportunities during construction. The Project involves an increase in student enrollment to 12,000 students in 2025. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building area for academic and recreation purposes, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and 805,000 square feet of parking structure with incidental office space by 2025. Additionally, the project will create an additional 323 jobs into the City. Moreover, as a 24 percent increase in population is expected from 2012 to 2040 within the City, it is reasonable to anticipate that the cumulative project's employment opportunities will be filled by residents that will reside in the region. Given the nature of the job opportunities and availability of labor, it is anticipated that any new jobs created by the proposed Project and cumulative development projects would not result in indirect

population growth. As mentioned above, it is not certain if future enrollment will increase the population of the City. If students already live locally, they would be included in the existing SCAG growth forecasts. In the unlikely event all new students originate from outside the City, the forecast enrollment could increase the City's population by 3,578 (a 1.0 percent over 2017 estimates). Any increase in population resulting from development pursuant to the CBUSP is consistent with existing and future population forecasts and would not significantly (directly or indirectly) increase population growth in the City or region. The project in and of itself is self-sustaining and will not contribute to a cumulative population increase into the City. Therefore, a less than significant impact would occur. No mitigation is required. (DEIR, pp. 6-19 - 6-20.)

## **N. Public Services**

The cumulative areas for fire and police protection services, schools, libraries, and community centers are the service areas within the City. The need for new and/or maintenance of existing public services and associated facilities is measured by service area population, or the number of residents and workers within the City's service area, as well as the type and density of development.

As additional development occurs in the City, there may be an overall increase in the demand for law enforcement and fire protection services, schools, libraries, and community centers, including personnel, equipment, and/or facilities. Increases in demand are routinely assessed by police and fire agencies, as well as by the City, as part of the annual monitoring and budgeting process. All development within the service areas of the City's Police and Fire Departments would be required to adhere to conditions established by these agencies and would be subject to applicable fees that will contribute to the maintenance of their facilities. The Project would result in the development of uses that are typical of those currently present in the service area for the City of Riverside's Police and Fire Departments and does not include any use or structure anticipated to disproportionally increase service demand beyond that which currently exists. Furthermore, all the future housing units within the CBUSP will be student housing and will not include the addition of any housing units that would increase numbers of school age children or increase the demand for libraries or community centers given that CBU already provides such facilities for students. With adherence to standard conditions and payment of required development fees, no significant cumulative impact on law enforcement and fire services, schools, libraries, and/or community centers in the City would occur. No mitigation is required. (DEIR, pp. 6-20 - 6-21.)

## **O. Recreation**

For context, the cumulative "universe" for impacts to recreation and parks resources would mainly be the City, but taking into consideration the location of parks maintained by the County, Community Service Districts, or other agencies overlapping or adjacent to the City of Riverside (i.e., not all of western Riverside County), this analysis is also sensitive to the fact there are federal and state recreational facilities that City residents can utilize in the nearby Santa Ana, San Gabriel, and San Bernardino Mountains as well.

The CBUSP Amendment is proposed by CBU to accommodate a projected increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building

area for academic and recreation purposes, including construction of the 158,000 square foot Events Center for hosting athletic and cultural/artistic events, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and 805,000 square feet of parking structure with incidental office space by 2025.

Although the Project proposes an increase in student enrollment, any increase in population from implementation of the proposed CBUSP Amendment would be students that would be served by the existing CBU recreation and parks facilities, as well as additional recreation and parks facilities proposed pursuant to the CBUSP Amendment.

By its very nature, the CBUSP Amendment establishes overall guiding principles and programmatic direction against which to review new development to assure it does not result in significant impacts to the environment from the use and/or construction of recreation and parks resources. The objectives and policies of the CBUSP Amendment related to parks and recreational facilities detailed in Section 4.15.2 of this EIR are designed to protect existing and provide for new recreation and park resources during the evaluation of future development. The programmatic development program detailed in Section 4.15.4 of this EIR establishes comprehensive development standards and design guidelines against which to review new development to ensure it does not create significant impacts from the use and/or construction of recreation and parks resources. These self-mitigating project design features are required for all future development and improvement projects to or in proximity to recreation and park resources.

The City maintains a park space requirement of 3 acres per one thousand residents pursuant to the Quimby Act (California Government Code 66477), and implementation of the CBUSP Amendment's comprehensive development program to provide additional recreation and parks facilities to accommodate the anticipated increase in student enrollment will help reduce CBU's overall impact on City and regional recreational facilities. Since any increase in population from the proposed Project would be served by the existing CBU recreation and parks facilities, as well as additional recreation and parks facilities proposed pursuant to the CBUSP Amendment, the project will not involve an increase in population that would increase demand for existing neighborhood and regional parks or other recreation facilities. For these reasons, implementation of the CBUSP Amendment will make less than significant contributions to cumulatively adverse impacts to recreation or park resources. No mitigation is required. (DEIR, p. 6-21 - 6-22.)

## **P. Transportation**

The cumulative impact area for transportation/traffic impacts consists of the study area (hereinafter referred to as the Study Area) identified in the Traffic Impact Analysis (TIA) for the California Baptist University Specific Plan prepared by Rick Engineering Company (Appendix F). The project-specific TIA analyzed Project impacts associated with intersection levels of service, roadway levels of service, intersection queuing, and ramp merge/diverge levels of service for the following scenarios:

- Existing Conditions (Year 2016)
- Existing plus Ambient Conditions (Year 2025)

- Existing plus Ambient plus Cumulative Conditions (Year 2025)
- General Plan Buildout Conditions (Year 2025)

The Existing plus Ambient scenario is essentially a building block for the Existing plus Ambient plus Cumulative near term cumulative scenario. For this reason, Project impacts are fully covered by the following baseline, near term cumulative, and long term cumulative scenarios:

- Baseline: Existing Conditions (Year 2025);
- Near Term Cumulative: Existing plus Ambient plus Cumulative Conditions (Year 2025); and
- Long Term Cumulative: General Plan Buildout (Year 2025).

The traffic study area was determined based on a quantitative process whereby specific study intersections, roadway segments and freeway mainline segments/merge-diverge locations were included in the traffic study where the proposed project's trips additions would exceed quantified thresholds. Cumulative projects are identified in the previously referenced Table 6.3.A and Figure 6-1.

There are currently 20 other planned or entitled projects within a two mile radius of the proposed Project. Each of these 20 cumulative projects was reviewed to determine if any cumulative project traffic will be added to the Project study area intersections or roadway segments. It was determined that 7 out of 20 cumulative projects are anticipated to add new trips to the Project area intersections and roadway segments. Trip generation was performed for each of these cumulative projects, and was distributed to the Project area intersections and roadways based on anticipated trip distribution patterns. The cumulative traffic volumes were then added to the existing plus ambient plus project traffic volumes.

***Near Term Cumulative: Existing plus Ambient plus Cumulative Conditions (Year 2025)***

**Intersections**

Implementation of the project-specific improvements defined in Mitigation Measures **MM-TRA-1** through **MM-TRA-3** were assumed to be in place in the Existing plus Ambient plus Cumulative plus Project level of service analysis. Existing plus Ambient plus Cumulative plus Project levels of service at study intersections are identified in Table 4.16.H. As shown in Table 4.16.H, two study area intersections are forecast to operate at LOS E or worse during the AM and/or PM peak hour. These intersections include:

- Adams Street/SR-91 WB Ramp – LOS E during the AM peak hour; and
- Adams Street/SR-91 EB Ramp –LOS F during the PM peak hour.

The Project creates or contributes to a LOS reduction at these intersections. This is considered to be a significant impact and mitigation is required. To operate at a satisfactory LOS, improvements to the Adams Street/SR-91 EB and WB Ramps such as those being studied as part of the SR-

91/Adams Street Project Study Report (PSR) would be required. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans.

The Project also creates or contributes to a queue length exceedance at the following five intersections:

- Adams Street/Garfield Street;
- Adams Street/SR-91 WB Ramps;
- Adams Street/SR-91 EB Ramps
- Adams Street/Indiana Avenue; and
- Magnolia Avenue/Jefferson Street.

This is considered to be a significant impact and mitigation is required. The Adams Street intersections at the SR-91 WB Ramps, SR-91 EB Ramps and Indiana Avenue would be reconstructed as part of the SR-91 improvements envisioned by the recently completed SR-91/Adams Street PSR. Project queue related impacts at these three intersections are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans. The queue length exceedances at the Adams Street/Garfield Street and Magnolia Avenue/Jefferson Street intersections would be mitigated by implementing the restriping and center median modifications described in **MM TRA-5** and **MM TRA-6**. With implementation of these measures, queueing related impacts at these intersections would be less than significant with mitigation incorporated.

#### Roadway Segments

Table 4.16.J shows all of the study area roadway segments are forecast to operate at LOS D or better in the Existing plus Ambient plus Cumulative plus Project traffic analysis with the exception of the following:

- Adams Street, between Briarwood Drive and Diana Avenue – LOS E; and
- Adams Street, between the SR-91 Eastbound and Westbound Ramps – LOS E.

The Project reduces the level of service at these roadway segments from LOS C to LOS E. This is considered to be a significant impact and mitigation is required. For the segment of roadway on Adams Street between Briarwood Drive and Diana Avenue, **MM TRA-7** requires widening along the Project's frontage to a 5 lane arterial resulting in 3 through lanes in the southbound direction and 2 through lanes in the northbound direction between Briarwood Drive and the SR-91 Westbound Ramp while maintaining the existing 2 through lanes in the northbound and



southbound direction from Briarwood Drive to Magnolia Avenue. Traffic impacts at the segment of Adams Street between Briarwood Drive and the freeway ramp would be less than significant with mitigation incorporated.

For the segment of roadway on Adams Street between the SR-91 WB and EB Ramps, widening of Adams Street would be required. Although the SR-91/Adams Street PSR may lead to widening of Adams Street, the specific design of the improvements has not taken place. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans.

#### Freeway Ramp Merge/Diverge Locations

Table 4.16.L shows that the study area freeway merge/diverge locations are forecast to operate at LOS C or better in the Existing plus Ambient plus Cumulative plus Project analysis with the exception of LOS F during the AM and PM peak hours at the SR 91 Eastbound Onramp at Adams Street. Although the SR 91 Eastbound Onramp at Adams Street is forecast to operate at LOS F during peak hours in the pre-Project condition (i.e., Existing plus Ambient plus Cumulative), the addition of Project traffic will add 1.8 pc/mi/ln density during the PM peak hour to the freeway segment. This is considered to be a significant impact and mitigation is required. To improve operations at this freeway segment, capacity-enhancing freeway mainline lanes improvements would be required. These freeway facilities are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is available. Although the SR-91/Adams Street PSR may lead to auxiliary or mainline lane improvements near that Adams Street interchange that might improve merge/diverge LOS, the specific design of the improvements has not taken place. Since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither the City nor the Project proponent can contribute fair share fees or implement the required improvements. This impact is therefore considered to be significant and unavoidable.

#### **Long Term Cumulative: General Plan Buildout (Year 2025)**

With regard to the *General Plan 2025* buildout scenario, cumulative impacts to transportation/traffic could be significant if the addition of Project-related traffic combined with the traffic expected at buildout per the *General Plan 2025* results in any study area intersection operating at LOS E or F, except at some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis (*General Plan 2025*, p. CCM-11).

### Intersections

Intersection impacts can be reduced by incorporating mitigation measures **MM-TRA-1** through **MM-TRA-7** as described in Section 4.16.6. Impacts would remain significant and unavoidable even after mitigation at the following intersections:

- Adams Street/Magnolia Avenue;
- Adams Street/SR-91 West Ramp;
- Adams Street/SR-91 Eastbound Ramp;
- Magnolia Avenue/Monroe Street;
- Magnolia Avenue/Campus View;
- Magnolia Avenue/Jefferson Street.

Two intersections that are forecast to have at least one turn movement queue that exceeds the existing pocket length in the General Plan Buildout plus Project condition. These intersections include:

- Adams Street/Indiana Avenue; and
- Magnolia Avenue/Jackson Street.

The Project creates or contributes to the queue length exceedances at these intersections which is considered to be a significant impact and mitigation is required. The Adams Street/Indiana Avenue intersection would be reconstructed as part of the SR-91 improvements envisioned by the recently completed SR-91/Adams Street PSR. Project queue related impacts at this intersection are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans. The queue length exceedances at the Magnolia Avenue/Jackson /Street intersection would be mitigated by implementing the restriping modifications described in **MM TRA-8**. With implementation of this measure, queueing related impacts would be less than significant with mitigation incorporated.

### Roadway Segments

Impacts would remain significant and unavoidable even after mitigation at the following roadway segments:

- Magnolia Avenue, all five segments from Jefferson Street to Jackson Street;
- Adams Street, between Garfield Street and Magnolia Avenue.

### Freeway Ramp Merge/Diverge Locations

The study area freeway merge/diverge locations are forecast to operate at LOS D or better in the General Plan Buildout plus Project analysis assuming completion of improvements to the SR-91/Adams Street interchange as resulting from the recently completed SR-91/Adams Street PSR. Because all freeway merge/diverge locations are forecast to operate within acceptable level of service standards, impacts are considered to be less than significant and no mitigation is required.

### Air Traffic Patterns, Design Hazards, Emergency Access, and Conflict with Adopted Policies

Given the distance between the proposed Project site and cumulative project sites, impacts associated with air traffic patterns, design hazards, emergency access, or conflicts with adopted policies, plans, or programs supporting alternative transportation would not comingle and create impacts over and above those associated with the proposed Project. Cumulative impacts from the proposed Project and cumulative projects associated with these issues are considered less than significant. Regarding alternative modes of transportation, the CBUSP is inherently self-mitigating in that the SP promotes pedestrian, bike and transit trips. No mitigation is required. (DEIR, p. 6-22 - 6-26.)

### **Q. Tribal Cultural Resources**

The cumulative area for Tribal cultural resources is the ancestral territory of affected Native American tribes. Past, present, and reasonably foreseeable future projects in Native American traditional use area(s) would similarly include ground-disturbing activities with the potential to destroy, damage, or displace surface or previously undiscovered Native American cultural resources, including burials and associated funerary objects; therefore, the project, in combination with other cumulative activities in the project area, has the potential to result in a significant cumulative impact.

Through implementation of applicable provisions of SB 18 and AB 52, affected Native American governments have the opportunity to identify areas of Native American cultural resource sensitivity and develop appropriate mitigation to reduce and/or avoid said impacts. Similar to the Project, as other project(s) located in Native American traditional use area(s) developed, it is reasonable to conclude Native American participation in this process will provide equal opportunities to identify specific measures to reduce the significance of impacts to Native American cultural resources. Implementation of mitigation measures **MM-CUL-1** through **MM-CUL-3** outlined in this EIR, and the CEQA documents for other developments in the City and other jurisdictions, will reduce potential cumulative Native American cultural resource impacts to a less than significant level. No additional mitigation for cumulative impacts is required. (DEIR, p. 6-26 - 6-27.)

### **R. Utilities and Service Systems**

Utilities and service systems include water, wastewater, storm drains, landfills, and solid waste disposal services.

*Water Supply.* The cumulative area for water supply-related issues is the general Riverside portion of the RPU service area. Existing and future development within the RPU service area would

demand additional quantities of water. The adopted 2015 Urban Water Management Plan (UWMP) projects population within the RPU service area to increase to 360,500 persons by the year 2040. Increases in population, square footage, and intensity of uses would contribute to increases in the overall regional water demand. The anticipated conversion of water-intensive uses and the implementation of existing water conservation measures and recycling programs would reduce the need for increased water supply.

CBU owns and operates two on-site wells used for irrigation purposes only. CBU maintains an “overlying water right” to pump groundwater from the Riverside-Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. CBU’s wells have been designed and constructed in accordance with Section 13801 of the California Water Code (CWC), Chapter 6.28 of the RMC, and the provisions of City Resolution No. 14733. Pursuant to the CWC, CBU files an annual notice of its groundwater use with the California State Water Board and/or Riverside Public Utilities Department (RPU), thereby maintaining private water rights for the use of their on-site wells.

CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields. Potable water is provided to CBU by City supplies. As detailed in Tables 4.18.E through 4.18.G of this EIR, RPU would have a reliable and sufficient water supply that would exceed projected demand through the year 2040 in wet, dry, and multiple-dry years. Therefore, cumulative impacts to water supply would be less than significant. The proposed Project would connect to existing conveyance infrastructure and adequate treatment capacity is available. Therefore, the proposed Project would not make a significant contribution to any cumulatively considerable impacts on water supply or infrastructure. (DEIR, p. 6-27.)

*Wastewater Services.* RPU and the RPW conjointly manage and plan wastewater and recycled water operations and programs. It is anticipated that all additional wastewater generated by the proposed Project would be routed and treated at the Riverside Water Quality Control Plant (RWQCP), located at 5950 Acorn Street approximately 2.3 miles northwest of the CBU campus. The cumulative area for wastewater-related issues is the RPU/RPW service area and the City of Riverside. Cumulative population increases and development within the area serviced by the RPU/RPW would increase the overall demand for wastewater treatment service. The anticipated project-specific water demand of 25,123,108 gallons of water per year, or 68,830.5 gallons of water per day would constitute potable water to be used for both drinking as well as sanitary needs resulting in wastewater. As a worst case scenario, even if all anticipated water demand were used for sanitary needs resulting in wastewater, the proposed project would generate an additional 68,830.5 gallons of wastewater per day.

Regional Water Recycling Plant Wastewater design hydraulic domestic sewage treatment capacity for the RWQCP is 46 million gpd. The plant treats an average influent wastewater flow of approximately 27.2 million gpd, leaving a surplus capacity of approximately 18.8 million gpd. The CBUSP Amendment would increase wastewater at the RWQCP by 0.25 percent, incrementally increasing demand for wastewater treatment.

Any proposed changes to capacity of the RWQCP or any facility maintained by RPW are reviewed throughout the year by the City. For all new development within the RPW service area, impact fees are allocated to assist in the financing of any future collection and disposal facilities and any future sewer treatment plant facilities. Cumulative development would not exceed the capacity of

the wastewater treatment system because the RWQCP would operate well below capacity under cumulative scenarios and would be expanded in the future as growth occurs. (DEIR, p. 6-28.)

*Storm Water Drainage Facilities.* Cumulatively, development within the watershed will result in an increase in impervious surfaces in addition to changes in land use and associated pollutant runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology and increase potential pollutant loads. However, all future development in the City and throughout the Santa Ana RWQCB will be required to comply with the requirements of the NPDES permit program. Continued growth is anticipated to occur in the City and all new development and significant redevelopment will be required to minimize its individual impacts to storm water drainage and pollutant transport through implementation of BMPs.

The project site is currently developed with drainage systems and will be improving stormwater drainage systems as future development occurs. As new development occurs, localized storm drains will be constructed and connected to existing storm drain systems that flow to the basin. Additionally, the on-site detention basin will continue to retain runoff and allow for its treatment to attain applicable water quality standards for the region and allow for some infiltration into the local aquifer. These improvements will be implemented as required to meet the demand of individual projects facilitated by implementation of the CBUSP Amendment based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations. Similar requirements will be placed on all other development in the vicinity of the Project site by the City. Therefore, the proposed Project will not make a significant contribution to any cumulatively considerable impacts related to drainage or water quality on a local or regional basis. DEIR, p. 6-28 - 6-29.)

*Solid Waste.* AB 341 mandates the reduction of solid waste disposal in landfills. The City's waste hauler will use a variety of County landfills in the area. With planned expansion activities of landfills in the Project vicinity and projected growth rates contained in the City's General Plan EIR, the increase in solid waste generated by the development under the proposed CBUSP Amendment is not anticipated to exceed capacity of the landfills. Additionally, Public Resource Code Section 41780 required every city and county to divert from landfills at least 50 percent of waste generated within their jurisdiction, and the City has exceeded its required reduction in recent years.

Solid waste is transported to the Agua Mansa Landfill located at 1830 Agua Mansa Road in Colton. The Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day. Future development within the CBUSP Amendment would contribute to Development Impact Fees (DIF) to contribute funding for expansion of solid waste facilities. As detailed in Section 4.18.5 of this EIR, the proposed Project would contribute an incremental amount of solid waste to the Agua Mansa Landfill; the amount of solid waste generated and disposed of in the Agua Mansa Landfill during operation of the Project is expected to be within the permitted capacity of the landfill. Therefore, the proposed Project would not create demands for solid waste services that would exceed the capabilities of the County's waste management system. Consequently, cumulative impacts associated with solid waste within the City would be considered less than significant. No mitigation is required. (DEIR, p. 6-29.)

## **S. Energy Conservation**

Electricity and natural gas services are provided to the proposed Project and the cumulative development projects by RPU and the Southern California Gas Company (SCG), respectively. Therefore the geographic context for cumulative impacts to electricity is the City and the geographical context for cumulative impacts to natural gas is the service area of SCG. SCG's service area encompasses most of central and southern California.

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted building standards consistent with Title 24.

The proposed Project will comply with, and in some cases exceed, Title 24 standards for insulation, glazing, lighting, shading, and water and space-heating systems in all new construction. Through the use of modern energy-efficient construction materials and practices, incorporation of the Sustainability Features described in Section 4.18.4 and Table 4.18-C of this EIR, in addition to compliance with Title 24 standards, the proposed Project will be consistent with the State's energy conservation standards and, therefore would not conflict with an adopted energy conservation plan.

The cumulative development projects must also abide by the City's building standards and the provisions of Title 24, and in some instances may exceed the Title 24 guidelines for new construction. It is also reasonable to assume that one or more of the cumulative development projects will use energy-efficient construction materials and practices.

Both RPU and SCG have adequate energy supplies to serve the proposed Project, the cumulative development projects, and to meet existing demand in future years. RPU and SCG are both developing additional energy supplies to serve anticipated development in future years.

SCAG's 2016/2040 RTP/SCS actively encourages and creates incentives for energy efficiency to reduce energy costs, increase reliability and availability of electricity for the state, and reduce environmental impact. Additionally, the Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) includes energy measures designed to increase community-wide building and equipment efficiency and renewable energy use, and promote energy efficiency and renewable energy generation for use supporting municipal operations that support the community. As detailed in Section 4.10.5 of this EIR, the proposed Project is consistent with the City's General Plan 2025 and SCAG's 2016 RTP/SCS for the purposes of encouraging and creating incentives for energy efficiency. Furthermore, as detailed in Section 4.7.5 of this EIR, with implementation of Mitigation Measures MM-GHG-1 and MM-GHG-2 designed to ensure energy efficiency in project design, construction and operation, the proposed Project is consistent with the City's RRG-CAP. The Project also provides and promotes alternatives to vehicular modes of travel, which will reduce car trips and result in efficient alternative transportation choices. Given these considerations, the proposed Project will not contribute to wasteful, inefficient, or unnecessary consumption of energy; conflict with existing energy standards and regulations; or place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. No

potentially significant cumulative effects related to energy conservation will result from the proposed Project. No additional mitigation is required. (DEIR, p. 6-30 – 6-31.)

## **4.5 Findings Regarding Significant Irreversible Environmental Changes**

CEQA Guidelines mandate that the EIR must address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (14 CCR 15126(c)). An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project implemented through the Specific Plan Amendment would result in the use of nonrenewable resources and energy sources, including fossil fuels during construction activities. Fossil fuels would be used to power equipment, as well as delivery and construction employee vehicles. Use of these energy sources would be considered a permanent commitment of resources. The future operation of the Project would have a long-term permanent commitment of nonrenewable energy sources such as electricity, natural gas and fossil fuels (employee and student vehicular trips). The consumption of energy resources is discussed in Section 4.19 Energy Consumption and Section 4.7 Greenhouse Gas Emissions. Mitigation is provided to reduce energy consumption under the discussion on greenhouse gas emissions to the extent feasible. Since the Specific Plan is proposed over a 10 year period it is reasonable to assume technology will advance that will reduce the use of fossil fuels (i.e., increased use of electric and hybrid vehicles, cool roofs to reduce the use of air conditioning and implementation of building codes that require heating and air conditioning within in buildings by individual sectors that can be controlled locally). The proposed Project's energy consumption would be relatively minor compared to other local and regional projects. Therefore, this would not be considered a significant irreversible environmental effect.. (DEIR, p. 5-2 – 5-3.)

## **4.6 Findings Regarding Growth Inducing Impacts**

According to State CEQA Guidelines Section 15126.2 (d), a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- A project would remove obstacles to population growth;
- Increases in the population may tax existing community service facilities, causing significant environmental effects; or
- A project would encourage and facilitate other activities that could significantly affect the environment.

The Project would involve the expansion of CBU facilities on an approximately 167-acre site over a 10-year period, as proposed in the CBU Specific Plan (CBUSP). The Project proposes to add approximately 400,000 square feet of building space for administrative, academic, student housing, and recreational purposes to accommodate growth in student enrollment to 12,000 students.

Based on a student to faculty/staff ratio of 11.11, the projected increase in students from 8,414 in 2015 to 12,000 by 2025 would yield an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. Therefore, the proposed Project would generate approximately 323 additional jobs in the City at CBU. Of the 12,000 projected students in 2025, 7,201 are considered traditional students, meaning full-time undergraduates who either live on campus or commute. Since every traditional student must live on campus until the age of 21 as a matter of CBU policy, and CBU's goal is to provide a bed-to-student ratio of 0.55 for traditional students. Implementation of the CBUSP Amendment could generate up to 326 additional student housing units by 2025.

The Project would not involve the development of additional traditional housing but does include additional housing for CBU students. The proposal to expanded CBU facilities by 400,000 square feet is to meet the growth demand anticipated at the university in the next 10 years. Meeting demands for educational services would not be growth inducing. This Project promotes infill development rather than encouraging new development within a currently undeveloped area. However, the Project would require additional employees to serve the expanded student population (323 new faculty members and potentially additional maintenance and administrative staff). Overall, the Project would indirectly stimulate population growth through the addition of new faculty members. However, the growth would be consistent with employment growth envisioned in local and regional land use plans and in projections made by regional planning authorities, since the planned growth of CBU and its land use intensity have been factored into the underlying growth projections of the SCAG 2015–2040 Regional Transportation Plan/Sustainable Communities Strategy.

According to SCAG's Growth Forecast (an appendix to the 2015-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)), the population of the City is anticipated to grow from 310,700 in 2012 to 386,600 in 2040 (SCAG 2016). Project increase in student population of 3,586 (all of which will not be living on campus or within the City of Riverside) will result in less than 0.9 percent of the total population in SCAG's projected growth in 2040 (Project population of 3,586 divided by SCAG's anticipated population of 386,000 in 2040). Therefore, the anticipated student population growth on the Project site will be considered a nominal increase contribution compared to the SCAG's Growth Forecast for the City in 2040.



According to SCAG's Growth Forecast, employment is anticipated to grow from 120,000 in 2012 to 200,500 in 2040 in the City (SCAG 2016). The Project is expected to create approximately 323 jobs at project build-out. Project generation of approximately 323 jobs will result in approximately 0.2 percent of the total employment in SCAG's Growth Forecast in 2040 (Project job generation of 323 divided by SCAG's forecasted employment of 200,500 in 2040). Therefore, the increase in employment will be minimal in comparison to the anticipated increase of the SCAG Growth Forecast.

Indirect growth can also occur by a project installing infrastructure that can support further growth. The Project site is served by existing public services and utilities, and no new utilities will be needed in order to serve the Project. Therefore, indirect growth inducement as a result of the extension of these facilities into a new area will not occur.

Overall, the Project will directly stimulate population growth through the addition of educational facilities. However, it is anticipated that not all the students will live on campus or in the immediate vicinity of CBU. It is also anticipated the additional faculty could live in the City or in surrounding communities. The Project will indirectly stimulate population growth through the addition of new jobs on the Project site.

Because of the reasons stated above, the Project would not result in substantial growth inducement. Growth inducement impacts are therefore considered to be less than significant and no mitigation is required. (DEIR, pp. 8-1 – 8-3.)

## **5.0 ALTERNATIVES TO THE PROJECT**

### **5.1 Summary of Project Alternatives and Objectives**

The State CEQA Guidelines (§15126.6 *et. seq.*) require that a reasonable range of alternatives to the Project be evaluated, provided they would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. CEQA Guidelines further require the analysis of the "No Project" Alternative, wherein the Project would not be approved and implemented. A number of project alternatives were considered but ultimately rejected for infeasibility or failure to lessen environmental effects.

The following alternatives to the Project were analyzed in the DEIR:

Alternative 1: No Project, Implement 2013 Approved CBUSP

Alternative 2: Increased Student Housing Alternative

State CEQA Guidelines section 15124(b) requires that a project description contain a statement of objectives including the underlying purpose of the project. The Project objectives are:

1. Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.

2. Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.
3. Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.
4. Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.
5. Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission.
6. Encourage environmentally sustainable development and operational practices.
7. Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.
8. Provide technologies that allow the University to offer state-of-the-art instruction and research. (DEIR, pp. 2-20 – 2-23, 7-1 – 7-4)

## **5.2 Alternatives Considered and Rejected From Further Consideration**

The CEQA Guidelines state that the EIR needs to examine in detail only the alternatives the lead agency determines could feasibly attain most of the basic objectives of the project. Further, the EIR should identify any alternatives that were considered by the lead agency but were rejected and briefly explain the reasons underlying the lead agency's determination. Among the factors used to eliminate alternatives from detailed consideration in the EIR are: failure to meet most of the basic project objectives; technical, legal, or economic infeasibility; and inability to avoid or lessen the significant environmental effects of the Project. (State CEQA Guidelines, § 15126.6(c)).

In addition to the two alternatives evaluated in the DEIR, several alternatives were considered, but were eliminated from further analysis. The alternatives eliminated from further analysis are discussed below.

### **1. Offsite Location Alternative**

The proposed Project is an expansion of an existing, private University, and an offsite alternative would not be able to meet any of the Project objectives. Although a private University, the CBU campus is traditional in nature and does not lend itself to offsite or satellite locations. For these reasons, an offsite location alternative was rejected from further consideration. (DEIR, p. 7-10.)

## **2. Reduced Intensity – Reduced Building Area**

This alternative would maintain the growth in enrollment to 12,000 students in year 2025 while reducing supporting administrative, academic, recreational, residential and athletic building space by 50 percent. Under this alternative, new building space would be reduced from 400,000 square feet to 200,000 square feet, the new 485,000 square foot East Parking Structure would be reduced to 242,500 square feet, and the new 320,000 square foot West Parking Structure would be reduced to 160,000 square feet. However, CBU is experiencing high demand to grow to accommodate increased enrollment demand ultimately caused by the expansion of the University's academic fields of study and move towards NCAA Division I athletics. The CBUSP includes the new building area and parking structures to accommodate the increased enrollment. For these reasons, the reduced building area alternative was rejected from further consideration. (DEIR, p. 7-10.)

## **3. Reduced Intensity –Building Elimination**

This alternative would maintain the growth in enrollment to 12,000 students in year 2025 while eliminating construction of additional administrative, academic, recreational, residential and athletic building space. Under this alternative, all of the 400,000 square feet of additional building space and the new 485,000 and 320,000 square foot parking structures would be eliminated. However, CBU is experiencing high demand to grow to accommodate increased enrollment demand ultimately caused by the expansion of the University's academic fields of study and move towards NCAA Division I athletics. The CBUSP includes the new building area and parking structures to accommodate the increased enrollment. Similar to the reduced building area alternative, the building elimination alternative was rejected from further consideration. (DEIR, p. 7-10.)

## **4. Expansion/Densification Alternative.**

This alternative would allow development within the open space and detention basin areas of the CBUSP along Magnolia Boulevard. In so doing, this alternative would meet all of the Project objectives and result in a more compact and dense on-campus development pattern promoting pedestrian and bicycle modes of travel and associated reductions in traffic, air quality, and greenhouse gas emissions impacts. However, the Magnolia Lawn is a protected historic open space and a component of the CBU Historic District. The CBU campus and the CBUSPACBUSP Amendment relies on the function of the detention basin to manage surface flows and to meet state and regional water quality mandates. For these reasons, the Expansion/densification alternative was rejected from further consideration. (DEIR, pp. 7-10 - 7-11.)

# **5.3 Alternatives Carried Forward for Further Analysis**

## **A. Alternative 1: No Project, Implement 2013 Approved CBUSP**

### Description

The No Project Alternative assumes that the proposed CBUSP Amendment would not be implemented and of the CBU campus would be governed by the existing CBUSP approved in 2013. As such, the University would be constrained by the student enrollment cap of 9,200 students

set forth in the existing CBUSP. CBU is nearly at that student enrollment as of 2017. The proposed Project is considered necessary in order to meet the growth and development goals of CBU. This alternative would not meet the single most important of the Project's objectives; however, CEQA requires the alternative to be analyzed. (DEIR, p. 7-12.)

### Summary of Impacts

The following table presents a summary of the impacts associated with the No Project, No Build alternative.<sup>5</sup>

Threshold	Impacts
Aesthetics	The proposed Project would not conflict with scenic vistas or scenic highways, conflict with the visual character of the Project site or surroundings, or produce substantial sources of light and glare. The No Project Alternative would result in less development on the CBU campus, with the same level of impacts regarding conflicts with scenic vistas or scenic highways, conflicts with the visual character of the Project site or surroundings. With less development, potential light and glare impacts would be slightly reduced under the No Project Alternative but impacts would remain unchanged at less than significant. (DEIR, p. 7-12.)
Agriculture and Forestry	The proposed Project would result in no impact regarding: conversion of prime, unique, or statewide important farmland to non-agricultural use; conflicts with agricultural zoning or Williamson Act; conflict with existing forest land zoning or cause rezoning of forest land; conversion of forest land to non-forest use; or other changes that would convert farmland or forest land. The No Project Alternative would result in less development on the CBU campus; however impacts to agricultural and forestry resources would remain unchanged at no impact. (DEIR, p. 7-12.)
Air Quality	The proposed Project would not: Conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standards; Result in cumulatively considerable net increase in any criteria pollutant; expose sensitive receptors to substantial pollutant concentrations; or Create objectionable odors. The Project would generate short-term construction and long-term operational emissions, which would all be at levels below applicable air quality standards. The No Project Alternative would generate the same level of short-term construction emissions as the proposed Project because new development on the CBU campus would occur under the approved CBUSP even if the proposed CBUSP Amendment does not move forward. Although there would be less overall development on the CBU campus under the No Project Alternative, the daily construction emissions for any given increment of development would be the same. Operational emissions under

<sup>5</sup> Source: DEIR, pp. 8-11 – 8-13.

Threshold	Impacts
	<p>the No Project Alternative would be reduced because less overall development would occur on the CBU campus. All impacts would remain unchanged at less than significant, although operational emission would be reduced and impacts associated with regional emissions, criteria pollutants, exposure to sensitive receptors would be reduced. (DEIR, p. 7-12 - 7-13.)</p>
<p>Biological Resources</p>	<p>The proposed Project would produce a less than significant impact regarding riparian or other sensitive habitats, jurisdictional waters/wetlands, wildlife movement and migratory species, and adopted policies and/or ordinances, and adopted habitat conservation plans. Impacts to candidate, non-listed sensitive or special-status species (i.e., nesting birds) were determined to be less than significant with implementation of mitigation. The No Project Alternative would result in development on the Project site, albeit to a lesser degree. The potential direct impacts to nesting birds would also occur under the No Project Alternative and the same mitigation would be required. Because future development under No Project Alternative could occur at any location on the CBU campus, impacts to biological resources would be the same as compared to the proposed Project. (DEIR, pp. 7-13.)</p>
<p>Cultural Resources</p>	<p>As described in Chapter 4.5, Cultural Resources, the proposed Project would produce a less than significant impact regarding historic resources, paleontological resources, and human remains. Impacts to archaeological resources (i.e., unanticipated discovery of archaeological resources during grading) were determined to be less than significant with implementation of mitigation. The No Project Alternative would result in the nearly same footprint of development on the Project site (i.e., less the Health Sciences buildings located west of Monroe Street not in the existing CBUSP Planning Area), albeit to a lesser degree due to the lower student growth and building area included in the existing CBUSP. The potential direct impacts to archaeological resources would also occur under the No Project Alternative and the same mitigation would be required. Because future development under No Project Alternative could occur at any location on the CBU campus potentially affecting significant archaeological resources, impacts would be the same as compared to the proposed Project and the same mitigation would be required to reduce the impact to less than significant. (DEIR, p. 7-13.)</p>

Threshold	Impacts
Geology and Soils	<p>The proposed Project would produce a less than significant impact regarding fault rupture, ground shaking, landslides and rockfalls, soil erosion or loss of topsoil, and septic tanks. Impacts regarding seismic-related ground failure, unstable soils, and expansive soils were determined to be less than significant with implementation of mitigation (i.e., site specific geotechnical/soils report). The No Project Alternative would result in development on the Project site, albeit to a lesser degree. The potential direct impacts regarding geology and soils would also occur under the No Project Alternative and the same mitigation would be required. Because future development under No Project Alternative could occur at any location on the CBU campus, impacts to geology and soils would be the same as compared to the proposed Project. (DEIR, p. 7-14.)</p>
Greenhouse Gas Emissions	<p>The Project would emit greenhouse gases (GHGs) during construction and operations, but emissions would not be cumulatively considerable. Impacts regarding conflicts with an approved GHG reduction plan, policy, or regulation were determined to be less than significant with implementation of mitigation (i.e., meet or exceed Title 24 energy efficiency standards; implement water conservation measures). Under the No Project Alternative, there would be reduced development and therefore GHG emissions would be less and would not be cumulatively considerable as for the proposed Project. Therefore, the No Project Alternative would result in the same significance regarding GHG emissions impacts, although GHG emissions would be reduced in comparison to the proposed Project. (DEIR, p. 7-14.)</p>
Hazards and Hazardous Materials	<p>The proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; conflicts with emergency response plans; and wildland fire risks. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant with implementation of mitigation (i.e., site specific Phase I Hazardous Materials Report; building specific lead-based paint, asbestos, and organochlorine pesticide surveys; Riverside Municipal Airport ALUP building height restrictions). Under the No Project Alternative, there would be reduced development; however, impacts associated with hazards and hazardous materials would be the same as for the proposed Project. (DEIR, p. 7-14.)</p>
Hydrology and Water Quality	<p>The proposed Project would produce no impact or a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of</p>

Threshold	Impacts
	<p>surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Under the No Project Alternative, there would be reduced development. However, impacts associated with hydrology and water quality would be mitigated to less than significant via adherence to existing rules and regulations regarding water quality, the same as for the proposed Project. (DEIR, p. 7-15.)</p>
Land Use and Planning	<p>The proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under the No Project Alternative, development on the CBU campus would be governed by the existing CBUSP and impacts associated with land use and planning would be less than significant. Impacts associated with land use and planning would be the same as for the proposed Project. (DEIR, p. 7-15.)</p>
Mineral Resources	<p>The proposed Project would produce a less than significant impact regarding loss of state, regionally, and locally important mineral resources. Under the No Project Alternative, impacts associated with mineral resources would also be less than significant. Impacts associated with mineral resources would be the same as for the proposed Project. (DEIR, p. 7-15.)</p>
Noise	<p>The proposed Project would produce a less than significant impact regarding exposure to excessive public or private airport noise. Impacts regarding noise in excess of standards established by the General Plan or noise ordinance, groundborne vibration, substantial permanent increase in ambient noise, and substantial temporary or periodic increase in ambient noise were determined to be less than significant with implementation of mitigation (i.e., construction noise attenuation; site specific noise studies; HVAC noise attenuation; and vibration attenuation for historic structures). The No Project Alternative would result in less development on the CBU campus, but implementation of the construction noise attenuation, site specific noise studies, HVAC noise attenuation, and vibration studies would be required. With mitigation, the No Project Alternative and proposed Project would result in less than significant noise impacts. (DEIR, pp. 7-15 - 7-16.)</p>
Population/Housing	<p>The proposed Project would produce a less than significant impact regarding population growth, displacement of housing, and displacement of people. The No Project Alternative would result in less development on the CBU campus, but</p>

Threshold	Impacts
	impacts regarding population and housing would be the same as in comparison to the proposed Project. (DEIR, p. 7-16.)
Public Services	The proposed Project would produce no impact or a less than significant impact regarding new or renovated police protection facilities, fire protection facilities, school facilities, library facilities, or other public facilities. The No Project Alternative would result in less development on the CBU campus, but demand for public services would occur. Similar to the proposed Project, the demand for public services under the No Project Alternative would not result in the need for new or expanded public services facilities the construction of which would produce a significant impact on the environment. Impacts regarding public services would be the same as compared to the proposed Project. (DEIR, p. 7-16.)
Recreation	The proposed Project would produce a less than significant impact regarding new or renovated recreational and park facilities. The No Project Alternative would result in less development on the CBU campus, and less demand on public parks. However, impacts regarding recreation would be less than significant, the same as for proposed Project. (DEIR, p. 7-16.)
Transportation/Traffic	The proposed Project would produce a less than significant impact related to: Air traffic patterns: design features or incompatible uses, Emergency access; and Public transit, bicycle, or pedestrian facilities. Impacts regarding conflicts with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and conflicts with the applicable congestion management program would be reduced with implementation of mitigation (i.e., offsite roadway improvements), but impacts to City intersections and roadways, SR-91 ramps, and SR-91 merge/diverge locations would remain significant and unavoidable. The No Project Alternative would result in less development on the CBU campus, and traffic impacts would be fully mitigated by implementation of the prior mitigation measures established as part of the existing CBUSP approval in 2013. Impacts regarding traffic would be eliminated in comparison to the proposed Project. (DEIR, p. 7-16.)



Threshold	Impacts
Tribal Cultural Resources	The proposed Project would produce a less than significant impact regarding listed or eligible tribal cultural resources and lead agency defined tribal cultural resources. The No Project Alternative would result in the nearly same footprint of development on the Project site (i.e., less the Health Sciences buildings located west of Monroe Street not in the existing CBUSP Planning Area), albeit to a lesser degree due to the lower student growth and building area included in the existing CBUSP. Development under the No Project Alternative could occur at any location on the CBU campus; however, impacts would be less than significant under the No Project Alternative. Impacts would be the same as compared to the proposed Project. (DEIR, p. 7-17.)
Utilities and Service Systems	The proposed Project would produce no impact or a less than significant impact regarding wastewater treatment requirements, construction of additional water and/or wastewater treatment facilities, construction of additional storm water drainage facilities, water supplies, wastewater treatment capacity, landfill capacity, and solid waste regulations. The No Project Alternative would result in less development on the CBU campus, but demand for utility services would occur. Similar to the proposed Project, the demand for utility services under the No Project Alternative would not result in the need for new or expanded utilities the construction of which would produce a significant impact on the environment. Impacts regarding utilities would be less than significant, the same as for the proposed Project. (DEIR, p. 7-17.)
Energy Conservation	The proposed Project would produce a less than significant impact regarding: Consumption of energy; Conflicts with energy standards and regulations; and Significant demand on local and regional energy supplies. The No Project Alternative would result in less development on the CBU campus, but demand for energy would occur. Similar to the proposed Project, the demand for energy under the No Project Alternative would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation would be less than significant, the same as for the proposed Project. (DEIR, p. 7-17.)

#### Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 1 meets each objective.

Project Objective	Alternative Meets Objective?
<p>Objective 1: Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.</p>	<p><b>No.</b> The No Project Alternative will not result in housing, buildings and other facilities to support planned student enrollment of 12,000 students by year 2025. The CBU campus would grow to 9,200 student enrollment under the existing CBUSP. (DEIR, p. 7-18.)</p>
<p>Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.</p>	<p><b>Yes.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP regulates architecture, signage, and landscaping in a manner that promotes campus identified similar to the proposed Project (DEIR, p. 7-18.)</p>
<p>Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.</p>	<p><b>No.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP provides an enhanced CBU campus setting for existing students. However, because curriculum for higher education is dynamic and tied to demand and changing technologies, the No Project Alternative will inhibit the University's ability to develop and offer curriculum based on the development limitations inherent in the adopted SP. For these reasons, the No Project Alternative would not attract prospective students and their parents. (DEIR, p. 7-18.)</p>
<p>Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.</p>	<p><b>Yes.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP accommodates diverse modes of mobility for students, staff, and visitors. (DEIR, p. 7-19.)</p>

Project Objective	Alternative Meets Objective?
Objective 5: Respect cultural features on the campus that reflect Riverside’s history and contribute to campus historical identity, while accommodating the University’s needs pursuant to its mission.	<b>Yes.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains provisions that ensure historic resources are treated and preserved in the same manner as the CBUSP Amendment. (DEIR, p. 7-19.)
Objective 6: Encourage environmentally sustainable development and operational practices.	<b>Yes.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains provisions that encourage environmentally sustainable development and operational practices in the same manner as the CBUSP Amendment. (DEIR, pp. 7-19 - 7-20.)
Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.	<b>Yes.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains objectives to enhance the positive image and relationship of CBU with the City of Riverside in the same manner as the CBUSP Amendment. (DEIR, p. 7-20.)
Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research.	<b>Yes.</b> The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains provisions that will provide facilities and staff that allow the University to offer state-of-the-art instruction and research in the same manner as the CBUSP Amendment. (DEIR, p. 7-20.)

Finding: The City Council rejects Alternative 1 (No Project, Implement 2013 Approved CBUSP) as a project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Alternative 1 does not implement single most

important Project objective (Objective 1); (2) Alternative 1 is infeasible because development of the University has nearly or has already reached the existing CBUSP growth limits.

### Facts and Supporting Information

The No Project Alternative would reduce impacts to most resource areas relative to the proposed Project, including elimination of the significant and unavoidable traffic impacts. The No Project Alternative would meet all but two of the Project's objectives, with the two exceptions being Objectives 1 and 3. Objective 1 is the single most important Project objective. Objective 1 is to: *Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.* Objective 3 is to: *Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.* Because the No Project Alternative does not meet the single most important objective (Objective 1) and would not enhance CBU's attraction and stature to prospective students and other universities and facilities (Objective 3), and the University has nearly or has already reached the existing CBUSP growth limits, this alternative has been eliminated from further consideration and is determined to be not feasible. (DEIR, pp. 7-20 – 7-21.)

## **B. Alternative 2: Increased Student Housing Alternative**

### Description

The Increased Student Housing Alternative assumes that the proposed CBUSP Amendment would be implemented. In support of the increase in enrollment to 12,000 students, the proposed Project and Increased Student Housing Alternative would result in: 400,000 square feet of additional administrative, academic, recreational, residential and athletic building space within a fixed campus area of 167 acres. In contrast to the proposed Project, this Alternative would accommodate increased demand for additional student housing on the CBU campus. In this manner, the projected student housing needs of 1,100 additional student beds would take place over and above the construction of 400,000 square feet of additional building area, two new parking structures (485,000 square feet and 320,000 square feet), and improved athletic stadiums. The Increased Student Housing Alternative was chosen for its potential to reduce traffic, air quality, and greenhouse gas emissions impacts associated with implementation of the proposed CBUSP Amendment. This Alternative would result in closer proximity between student housing and CBU classrooms, offices, and administrative areas and therefore promote pedestrian and bicycle modes of travel. In this way, the Increased Student Housing Alternative would result in reduced trip making and reduced traffic, air pollution emissions, and GHG emissions impacts. The proposed Project is considered necessary in order to meet the growth and development goals of CBU.

The increase of 1,100 student beds would generate demand for 770 additional parking spaces based on 0.7 spaces per student ( $1,100 \times 0.7 = 770$ ), which would require at least one additional parking structure. The increase of 1,100 beds would require additional provisions for residential space, food service, security, and health care. Although the 1,100 beds would occur above and beyond the provision of 400,000 square feet of additional building area, the campus area is fixed at 167 acres. Moreover, existing restrictions by the Airport Land Use Commission limit building heights to 100 feet or lower, serving to limit the vertical extent that development may be allowed. This

Alternative would create tension between the ability to provide space for academic development consistent with Project Objective 1 and the burden of providing space for the additional facilities to support the increased student housing. (DEIR, p. 7-21.)

### Summary of Impacts

The following table presents a summary of the impacts associated with Alternative 2 (Increased Student Housing Alternative).

Threshold	Impacts
Aesthetics	The proposed Project would not conflict with scenic vistas or scenic highways, conflict with the visual character of the Project site or surroundings, or produce substantial sources of light and glare. The Increased Student Housing Alternative would result in more development on the CBU campus, with the same level of impacts regarding conflicts with scenic vistas or scenic highways, conflicts with the visual character of the Project site or surroundings. With more development, potential light and glare impacts would be slightly increased under the Increased Student Housing Alternative but impacts would remain unchanged at less than significant. (DEIR, pp. 7-21 - 7-22.)
Agriculture and Forestry	The proposed Project would result in no impact regarding: conversion of prime, unique, or statewide important farmland to non-agricultural use; conflicts with agricultural zoning or Williamson Act; conflict with existing forest land zoning or cause rezoning of forest land; conversion of forest land to non-forest use; or other changes that would convert farmland or forest land. The Increased Student Housing Alternative would result in more development on the CBU campus; however impacts to agricultural and forestry resources would remain unchanged at no impact. (DEIR, p. 7-22.)
Air Quality	The proposed Project would not: conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standards; result in cumulatively considerable net increase in any criteria pollutant; expose sensitive receptors to substantial pollutant concentrations; or create objectionable odors. The Project would generate short-term construction and long-term operational emissions, which would all be at levels below applicable air quality standards. The Increased Student Housing Alternative would generate the same level of short-term construction emissions as the proposed Project because new development on the CBU campus would occur in the same manner as the proposed Project. Although there would be more overall development on the CBU campus under the Increased Student Housing Alternative, the daily construction emissions for any given increment of development would be the same. Operational emissions would be reduced because the Increased Student Housing Alternative would result in a denser development pattern in comparison to the proposed Project. The denser

Threshold	Impacts
	development pattern would be created by the Alternative's accommodation of student bed demand on campus and in close proximity to existing and future academic, administrative, and office facilities resulting in reductions in both trip generation and air pollution emissions. Even though the quantity of operational emissions and impacts associated with regional emissions, criteria pollutants, and exposure to sensitive receptors would be reduced, the significance of impacts would remain unchanged at less than significant. (DEIR, p. 7-22.)
Biological Resources	The proposed Project would produce a less than significant impact regarding riparian or other sensitive habitats, jurisdictional waters/wetlands, wildlife movement and migratory species, and adopted policies and/or ordinances, and adopted habitat conservation plans. Impacts to candidate, non-listed sensitive or special-status species (i.e., nesting birds) were determined to be less than significant with implementation of mitigation. The Increased Student Housing Alternative would result in more development and in a denser manner on the Project site. The potential direct impacts to nesting birds would also occur under the Increased Student Housing Alternative and the same mitigation would be required. Because future development under Increased Student Housing Alternative could occur at any location on the CBU campus, impacts to biological resources would be the same as compared to the proposed Project. (DEIR, p. 7-23.)
Cultural Resources	The proposed Project would produce a less than significant impact regarding historic resources, paleontological resources, and human remains. Impacts to archaeological resources (i.e., unanticipated discovery of archaeological resources during grading) were determined to be less than significant with implementation of mitigation. The Increased Student Housing Alternative would result in the same footprint of development on the Project site, albeit at a more dense level due to the additional student beds included in the Alternative. The potential direct impacts to archaeological resources would also occur under the Increased Student Housing Alternative and the same mitigation would be required. Because future development under Increased Student Housing Alternative could occur at any location on the CBU campus potentially affecting significant archaeological resources, impacts would be the same as compared to the proposed Project and the same mitigation would be required to reduce the impact to less than significant. (DEIR, p. 7-23.)
Geology and Soils	The proposed Project would produce a less than significant impact regarding fault rupture, ground shaking, landslides and rockfalls, soil erosion or loss of topsoil, and septic tanks. Impacts regarding seismic-related ground failure, unstable soils, and expansive soils were determined to be less than significant with

Threshold	Impacts
	<p>implementation of mitigation (i.e., site specific geotechnical/soils report). The No Project Alternative would result in development on the Project site, albeit to a lesser degree. The potential direct impacts regarding geology and soils would also occur under the Increased Student Housing Alternative and the same mitigation would be required. Because future development under Increased Student Housing Alternative could occur at any location on the CBU campus, impacts to geology and soils would be the same as compared to the proposed Project. (DEIR, p. 7-23.)</p>
Greenhouse Gas Emissions	<p>The proposed Project would emit greenhouse gases (GHGs) during construction and operations, but emissions would not be cumulatively considerable. Impacts regarding conflicts with an approved GHG reduction plan, policy, or regulation were determined to be less than significant with implementation of mitigation (i.e., meet or exceed Title 24 energy efficiency standards; implement water conservation measures). Under the Increased Student Housing Alternative, there would be increased development. However, GHG emissions would be reduced because the Increased Student Housing Alternative would result in a denser development pattern in comparison to the proposed Project including accommodation of student beds on campus and in close proximity to existing and future academic, administrative, and office facilities resulting in reductions in both trip generation and GHG emissions. Even though the quantity of GHG emissions would be reduced in comparison to the proposed Project, the Increased Student Housing Alternative would result in the same less than significant determination regarding GHG emissions impacts with implementation of Project Design Features contained in the CBUSP Amendment and implementation of mitigation measures MM-GHG-1 and MM-GHG -2. (DEIR, p. 7-24.)</p>
Hazards and Hazardous Materials	<p>The proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; conflicts with emergency response plans; and wildland fire risks. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant with implementation of mitigation (i.e., site specific Phase I Hazardous Materials Report; building specific lead-based paint, asbestos, and organochlorine pesticide surveys; Riverside Municipal Airport ALUP building height restrictions). The Increased Student Housing Alternative would result in the same impacts regarding hazards impacts and implementation the same mitigation measures would be required. (DEIR, p. 7-24.)</p>

Threshold	Impacts
Hydrology and Water Quality	<p>The proposed Project would produce no impact or a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Under the Increased Student Housing Alternative, there would be increased development. However, impacts associated with hydrology and water quality would be mitigated to less than significant via adherence to existing rules and regulations regarding water quality, the same as for the proposed Project. (DEIR, pp. 7-24 - 7-25.)</p>
Land Use and Planning	<p>The proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under the Increased Student Housing Alternative, development on the CBU campus would be governed by the CBUSP Amendment but at a denser level. Impacts associated with land use and planning would be less than significant, the same as for the proposed Project. (DEIR, p. 7-25.)</p>
Mineral Resources	<p>The proposed Project would produce a less than significant impact regarding loss of state, regionally, and locally important mineral resources. Under the Increased Student Housing Alternative, impacts associated with mineral resources would also be less than significant. Impacts associated with mineral resources would be the same as for the proposed Project. (DEIR, p. 7-25.)</p>
Noise	<p>The proposed Project would produce a less than significant impact regarding exposure to excessive public or private airport noise. Impacts regarding noise in excess of standards established by the General Plan or noise ordinance, groundborne vibration, substantial permanent increase in ambient noise, and substantial temporary or periodic increase in ambient noise were determined to be less than significant with implementation of mitigation (i.e., construction noise attenuation; site specific noise studies; HVAC noise attenuation; and vibration attenuation for historic structures). The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and place more sensitive receptors (i.e., student housing) on campus within a compact area. This would introduce greater restrictions on construction and operational noise to protect this increased number of sensitive receptors. Implementation of construction noise attenuation, site specific noise studies, HVAC noise attenuation, and vibration studies would be required to ensure resulting noise levels at the student housing</p>



Threshold	Impacts
	locations are within the Municipal Code levels and/or other specified performance standards. With this additional mitigation, the Increased Student Housing Alternative would result in less than significant noise impacts in a similar manner to the proposed Project. (DEIR, p. 7-25.)
Population/ Housing	The proposed Project would produce a less than significant impact regarding population growth, displacement of housing, and displacement of people. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, including additional student housing over and above that permitted by the proposed Project. Impacts regarding population and housing would be less than significant, the same as for the proposed Project. (DEIR, p. 7-26.)
Public Services	The proposed Project would produce no impact or a less than significant impact regarding new or renovated police protection facilities, fire protection facilities, school facilities, library facilities, or other public facilities. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus and a similar demand for public services as the proposed Project. Similar to the proposed Project, the demand for public services under the Increased Student Housing Alternative would not result in the need for new or expanded public services facilities the construction of which would produce a significant impact on the environment. Impacts regarding public services would be the same as compared to the proposed Project. (DEIR, p. 7-26.)
Recreation	The proposed Project would produce a less than significant impact regarding new or renovated recreational and park facilities. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and a similar demand on public parks. However, impacts regarding recreation would be less than significant, the same as for proposed Project. (DEIR, p. 7-26.)
Transportati on/ Traffic	The proposed Project would produce a less than significant impact related to: air traffic patterns; design features or incompatible uses; emergency access; and public transit, bicycle, or pedestrian facilities. Impacts regarding conflicts with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and conflicts with the applicable congestion management program would be reduced with implementation of mitigation (i.e., offsite roadway improvements), but impacts to City intersections and roadways, SR-91 ramps, and SR-91 merge/diverge locations would remain significant and unavoidable. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, including additional student housing over and above that permitted by the proposed Project. However, trip generation

Threshold	Impacts
	<p>would be reduced because the Increased Student Housing Alternative would accommodate student housing on campus and in close proximity to existing and future academic, administrative, and office facilities resulting in reductions in trip generation. In addition, traffic impacts would be fully mitigated by implementation of the mitigation measures identified in Chapter 4.16 for the proposed Project. Impacts regarding traffic would be reduced in comparison to the proposed Project, although of impacts would remain significant and unavoidable even with mitigation. (DEIR, pp 7-26 – 7-27.)</p>
Tribal Cultural Resources	<p>The proposed Project would produce a less than significant impact regarding listed or eligible tribal cultural resources and lead agency defined tribal cultural resources. The Increased Student Housing Alternative would result in the same footprint of development on the Project site, albeit at a denser pattern due to the addition of new student housing on the CBU campus. Development under the Increased Student Housing Alternative could occur at any location on the CBU campus; however, impacts would be less than significant. Impacts would be the same as compared to the proposed Project. (DEIR, p. 7-27.)</p>
Utilities and Service Systems	<p>The proposed Project would produce no impact or a less than significant impact regarding wastewater treatment requirements, construction of additional water and/or wastewater treatment facilities, construction of additional storm water drainage facilities, water supplies, wastewater treatment capacity, landfill capacity, and solid waste regulations. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and the same need for utility services would occur. Similar to the proposed Project, the demand for utility services under the Increased Student Housing Alternative would not result in the need for new or expanded utilities the construction of which would produce a significant impact on the environment. Impacts regarding utilities would be less than significant, the same as for the proposed Project. (DEIR, p. 7-27.)</p>
Energy Conservation	<p>The proposed Project would produce a less than significant impact regarding: consumption of energy; conflicts with energy standards and regulations; and significant demand on local and regional energy supplies. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and a slightly increased demand for energy would occur. Similar to the proposed Project, the demand for energy under the Increased Student Housing Alternative would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation would be less than significant, the same as for the proposed Project. (DEIR, p. 7-27.)</p>

### Relationship to Project Objectives

The following table identifies the Project objectives and whether or not Alternative 2 meets each objective.

Project Objective	Alternative Meets Objective?
Objective 1: Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.	<b>No.</b> Increased Student Housing Alternative adds approximately 1,100 student beds on campus, over and above the provisions of the proposed CBUSP Amendment. This produces demand for additional structured parking and support services to house and serve additional student living on campus. Because the campus area is fixed at 167 acres, this impacts potential expansion of academic facilities to meet the objective. The Alternative fails to meet this objective more so than the propose Project.. (DEIR, p. 7-28.)
Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.	<b>Yes.</b> The Increased Student Housing Alternative implements the proposed CBUSP Amendment. (DEIR, p. 7-28.)
Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.	<b>No.</b> The Increased Student Housing Alternative fails to meet this Objective because it would impede the ability to achieve Policy 3.1 and 3.3 due to physical commitments to serve a greater student population within a fixed amount of space. It would tax the services under Policy 3.2 by placing more demand on security services. (DEIR, pp. 7-28 - 7-29.)

Project Objective	Alternative Meets Objective?
<p>Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.</p>	<p><b>Yes in part.</b> The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the provisions of the proposed CBUSP Amendment. These additional beds will generate a demand for an additional 770 parking spaces that equates to at least one additional parking structure. This additional commitment of land resources would compromise the ability to achieve Objective 1. (DEIR, p. 7-29.)</p>
<p>Objective 5: Respect cultural features on the campus that reflect Riverside’s history and contribute to campus historical identity, while accommodating the University’s needs pursuant to its mission.</p>	<p><b>Yes.</b> The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the provisions of the proposed CBUSP Amendment. (DEIR, pp. 7-29 – 7-30.)</p>
<p>Objective 6: Encourage environmentally sustainable development and operational practices.</p>	<p><b>Yes.</b> The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the provisions of the proposed CBUSP Amendment. The 1,100 additional on campus residents will require water and produce waste in the same manner whether on- or off-campus. Building energy and lifecycle improvements would be the same as the proposed Project. (DEIR, p. 7-30.)</p>
<p>Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.</p>	<p><b>Yes.</b> The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the provisions of the proposed CBUSP Amendment. (DEIR, p. 7-30.)</p>

Project Objective	Alternative Meets Objective?
Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research.	<b>No.</b> The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the provisions of the proposed CBUSP Amendment. This additional commitment of land resources would compromise the ability to achieve Objective 8. (DEIR, p. 7-30.)

Findings: The City Council rejects Alternative 2 as a project alternative on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) Although Alternative 2 would have reduced impacts to air quality, greenhouse gas emissions, and transportation/traffic, Alternative 2 would not meaningfully reduce the significant and unavoidable impacts of the Project; (2) Although Alternative 2 implements five of the eight Project objectives, an additional objective (Objective 4) is not reached to the same degree as the Project; (3) Alternative 2's emphasis on providing on-campus student housing would limit the ability to develop an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structures both of which are more important to the University. Therefore, Alternative 2 is rejected from further consideration.

#### Facts and Supporting Information

The Increased Student Alternative would reduce the severity of impacts related to air quality, greenhouse gas emissions, and traffic. However, impacts for air quality and greenhouse gas would remain less than significant and traffic significant in the same manner as the Proposed Project. The Increased Student Housing Alternative would meet five of eight Project objectives, with Objectives 1, 3, and 8 not met. Objective 1 is the single most important Project objective. Objective 1 is to: *Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.* Objective 3 is to: *Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities;* and Objective 8 is to: *Provide technologies that allow the University to offer state-of-the-art instruction and research.* In addition, Alternative 2 would emphasize the provision of on-campus student housing and in so doing limit the ability to develop an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structures both of which are more important to the University. Because the Increased Student Housing Alternative does not meet the single most important objective (Objective 1), would not enhance CBU's attraction and stature to prospective students and other universities and facilities (Objective 3), would not provide technologies to offer state-of-the-art instruction and research (Objective 8), and would limit the ability to develop additional buildings and parking structures, Alternative 2 is rejected as infeasible. Thus, this alternative has been eliminated from further consideration. (DEIR, pp. 7-30 – 7-31.)

## **5.4 Identification of No Project Alternative**

The No Project Alternative is addressed to compare the environmental effects of the Project in its existing state against environmental effects which would occur if the project is approved. “No project” can be interpreted as no development or maintaining the existing condition. This analysis is required pursuant to CEQA Guidelines Section 15126.6(e).

“No project” can also be interpreted as development under an adopted plan. CEQA Guidelines Section 15126.6(e)(3)(A) states:

When the project is the revision of an existing land use or regulatory plan, policy or ongoing operation, the "no project" alternative will be the continuation of the existing plan, policy, or operation into the future. Typically this is a situation where other projects initiated under the existing plan will continue while the new plan is developed.

Alternative 2, as discussed above, represents development which would be reasonably expected to occur in the foreseeable future if development of the site were to proceed based on the existing approved CBUSP and represents the analysis of Alternative 1 – No Project/Implement 2013 Approved CBUSP, above.

## **5.5 Environmentally Superior Alternative**

CEQA Guidelines section 15126.6(e)(2) requires that an EIR identify the “environmentally superior alternative” based on the evaluation of the project and its alternatives. Considerations relevant to the identification and discussion of the environmentally superior alternative include a proposal which contemplates less development than the proposed project and which correspondingly reduces most or all of the proposed project’s adverse environmental impacts. Of the alternatives evaluated above, Alternative 1 (No Project, Implement 2013 Approved CBUSP) is the environmentally superior alternative, because the Project site would stay in its existing condition. Since no development would occur, Alternative 1 would eliminate the significant and unavoidable impacts to transportation/traffic. (DEIR, p. 7-36.)

When a No Project Alternative is identified as the environmentally superior alternative, the EIR must identify an environmentally superior alternative from the other alternatives. Given there is only one additional alternative considered after the No Project Alternative, the Increased Student Housing Alternative is considered to be the Environmentally Superior Alternative. The Increased Student Housing Alternative would reduce the volume or extent of the air quality, greenhouse gas, and traffic impacts, although the significance of the impacts would remain the same as the proposed Project and the significant and unavoidable traffic impact would remain. (DEIR, p. 7-36.)

As mentioned previously, the increase of 1,100 student beds would generate demand for 770 additional parking spaces based on 0.7 spaces per student ( $1,100 \times 0.7 = 770$ ), which would require at least one additional parking structure. The increase of 1,100 beds would require additional provisions for residential space, food service, security, and health care. Although the 1100 beds would occur above and beyond the provision of 400,000 square feet of additional building area,

the campus area is fixed at 167 acres. Moreover, existing restrictions imposed by the Airport Land Use Commission limit building heights to 100 feet or lower, serving to limit the vertical extent that development may be allowed. This Alternative would create tension between the ability to provide space for academic development consistent with Project Objective 1 and the burden of providing space for the additional facilities to support the increased student housing.

For these reasons, this alternative would fail to meet all of the Project's objectives. The Increased Student Alternative has been rejected because it would fail to meet the most important objective, Objective 1, as well as failing to meet Objective 3, and Objective 8. (DEIR, p. 7-36.)

## **6.0 STATEMENT OF OVERRIDING CONDITIONS**

### **6.1 Significant and Unavoidable Impacts**

Based on the information and analysis set forth in the EIR and the record of proceedings, implementation of the proposed Project would result in the significant and unavoidable impacts identified below, and as such, a statement of overriding conditions must be adopted before the Project may be approved:

- Transportation/Traffic – Local Roadways and Intersections: Improvements contained in mitigation measures MM TRA-1 through MM TRA-8 have been identified which would result in acceptable levels of service at local intersections, ensure queues stay within available pocket lengths at local intersections, and maintain acceptable levels of service on local roadways even with the addition of Project-related traffic. However, even with implementation of all feasible mitigation measures in the future General Plan Buildout scenario, these improvements would not fully mitigate cumulative level of service impacts at:
  - Three intersections on Magnolia Avenue (Adams Street, Monroe Street, Jefferson Street);
  - Five roadway segments on Magnolia Avenue (between Jefferson Street and Adams Street, between Adams Street and Campus View, between Campus View Drive and Monroe Street, between Monroe Street and Overland Street, between Overland Street and Jackson Street); and
  - One roadway segment on Adams Street (between Garfield Street and Magnolia Avenue).

Consistent with the City's policy to maintain Magnolia Avenue as a 4-lane Special Boulevard, there is no reasonable and feasible mitigation available for the Magnolia Avenue intersection and roadway deficiencies. Although the Magnolia Avenue Specific Plan states the integration of a rapid bus transit system is a consideration for the reduction of traffic volumes along the Magnolia Avenue corridor, lacking any reasonable and feasible mitigation, traffic impacts at the Magnolia Avenue intersections and on Magnolia Avenue would remain significant and unavoidable.

- Transportation/Traffic – Regional Facilities: With the addition of Project-related traffic, level of service or pocket length deficiencies are forecast at:
  - Three intersections on Adams Street (SR-91 WB Ramps, SR-91 EB Ramps, and Indiana Avenue); and
  - One roadway segment on Adams Street, between the SR-91 ramps.

For the ramp intersections at Adams Street and the segment of Adams between the ramps to operate at a satisfactory level of service, improvements such as those being studied by the City and Caltrans as part of the SR-91/Adams Street Project Study Report (PSR) would be required. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the level of service from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans.

The City Council finds that it has imposed all feasible mitigation to reduce the Project's significant impacts to a less than significant level. The City Council further finds that, except for the Project, all other alternatives set forth in the Draft EIR are infeasible because they would prohibit the realization of the Project objectives. Further analyses would be required to determine the full impact of the alternatives should the City ever select another alternative as a project and as such, the other alternatives are hereby found to be infeasible.

## **6.2 Project Benefits**

The Riverside City Council, (i) having independently reviewed the information in the Final EIR and the record of proceedings; (ii) having made a reasonable and good-faith effort to eliminate or substantially lessen the impacts resulting from the Project to the extent feasible by adopting mitigation measures identified in the EIR and Mitigation Monitoring and Reporting Program (“MMRP”); and (iii) having balanced benefits of the Project against its significant and unavoidable environmental impacts, chooses to approve the Project despite its significant and unavoidable effects, because, in its view, specific economic, biological, social, technological, or other benefits of the Project render the significant effects acceptable in light of benefits.

The City Council finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the Project notwithstanding the significant and unavoidable impacts. The Project would provide the following benefits:

- The Project implements the Objectives and land use designations of the General Plan 2025 by ensuring well-planned infill development along established transportation corridors; and improving or expanding the housing stock to support and compliment the major educational institutions and rapid bus transit in the Riverside community.



- The Project enables students to acquire knowledge, skills, and aspirations by providing academic programs that prepare students for professional careers that sustain economic development.
- The Project fosters an environment supporting the intellectual, physical, social, and spiritual development of each student so that they will become productive and good citizens in the communities they serve.
- The Project promotes a unified and recognizable campus identity that sustains an elevated community aesthetic by providing detailed architecture, signage, and landscaping guidelines.
- The Project creates meaningful and gainful employment by providing construction-related jobs, increased employment of faculty and staff, and developing a workforce to benefit the economy of Riverside and other communities.
- The Project supports existing and future local businesses by providing an increased customer base for local businesses. The increased customer base will also provide increased sales tax revenues.
- The Project produces performing arts and competitive sports venues that will promote the image of Riverside and attract visitors. Visitors will increase the demand for lodging and dining, which will increase sales tax revenues.
- The Project capitalizes on opportunities for diverse modes of transportation mobility by concentrating a population where key transportation infrastructure exists and where alternative forms of transportation can thrive.
- The Project preserves and protects cultural resources on the campus that reflect Riverside's history by establishing historic districts and guidelines for the treatment of each historic resource on campus.
- The Project implements environmentally sustainable practices by achieving higher energy efficiency and reducing long-term operating expenses through building design; waste diversion programs to aid the City in meeting legislative requirements; and sustainability measures that support the City's Green Action Plan.
- The Project site is located along major transportation corridors with proximate access to the Interstate freeway system and major roadways in an urban setting. Adding density to the campus acts to reduce vehicle miles traveled and takes advantage of existing infrastructure systems.
- The Project serves as a laboratory for technological development by implementing communication and workplace technologies and partnering with associated organizations to remain current on technological advancements.

## 6.3 Overriding Considerations

The following discussion provides the support of overriding considerations, which are a result of infeasible mitigation measures or alternatives to avoid the significant and unavoidable impacts that would result from the proposed Project.

### Economic Reasons

**The proposed Project provides economic benefits in the form of: (1) construction jobs; (2) permanent employment of faculty and staff; (3) workforce development; and (4) athletic and performing arts venues that attract visitors to Riverside. The proposed Project will continue to increased property tax revenue as the campus grows.**

#### Jobs

Temporary construction and long-term operational jobs created by the Project would result in increased spending throughout the region, including the City. During the construction phase of the proposed Project, direct jobs, that would be created, further increase indirect jobs in the City and in the economic region. Additionally, over the construction period, construction spending would add revenue to local and regional output. Construction spending would also increase local earnings and regional earnings. After construction, the development would create new on-site jobs as well as indirect jobs in the City and in the economic region.

The new gainful and meaningful faculty and staff jobs would be an increase over existing conditions. This increase in jobs would be an overall benefit to the local and regional economy.

The provision of additional jobs by maximizing employment on the Project site would support a better jobs-to-housing ratio and would reduce unemployment in the City.

New jobs associated with the Project are expected to include both manual occupations (e.g., building maintenance, landscaping, waste disposal) academic- based occupations (e.g., administrators, professors, teacher assistants) and support personnel (housing management, food service, security). Manual, academic and support-based occupations have the potential to pay relatively high wages, thereby contributing to the provision of jobs for a variety of income levels. Additionally, as discussed previously, the proposed Project would generate short-term construction-related and long-term operational jobs.

#### Tax Revenue

The Project would have a positive fiscal impact on the City through construction and development of the Project, as well as throughout the life of the Project. As noted above, the construction and development of the site would produce a temporary economic stimulus as a result of one-time construction-related spending in the form of one-time development fees. These fees include city fees, sewer and water fees, transportation fees, and permit fees. In addition to the one-time payment of fees, property taxes and indirect

sales taxes would be collected during this time and paid to the City. During the operational phase of the Project (during which time the campus is fully constructed and functional), additional revenues will be paid to the City in the form of property taxes, indirect sales tax, business license fees.

#### Market Demand Reasons

The proposed Project has been designed to optimize the use of land within the campus, taking into consideration site constraints and applicable development standards. Further, California Baptist University has experienced extraordinary demand and growth since 2006 with a student enrollment increasing from 750 to 9,000 students. Additionally, this location would provide access to a full range of transportation infrastructure, including a large freeway system that connects to points within and outside the region.

#### Social Reasons

The Project is a factory for workforce development and that fosters an environment supporting the intellectual, physical, social, and spiritual development of each student so that they will become productive and good citizens in the communities they serve. The Project includes historic districts to preserve and protect examples of Riverside history that exist within the campus.

#### Conclusion

The City, after balancing the specific economic, social, and other benefits of the Project, has determined that the significant and unavoidable adverse environmental impacts identified may be considered “acceptable” due to the specific considerations listed above, which outweigh the unavoidable, adverse environmental impacts of the Project.

Accordingly, the City of Riverside adopts the above statement of overriding considerations, recognizing that significant and unavoidable traffic/transportation impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures; (ii) rejected alternatives to the proposed Project, as discussed above; and (iii) recognized all unavoidable significant impacts, the City hereby finds that each of the separate benefits of the Project, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants approval of the Project and outweighs and overrides its unavoidable significant effects, and, thereby, justifies the approval of the Project.

## **6.4 Significant and Unavoidable Impacts**

Based on the information and analysis set forth in the EIR and the record of proceedings, implementation of the proposed Project would result in the significant and unavoidable impacts identified below, and as such, a statement of overriding conditions must be adopted before the Project may be approved:

- Transportation/Traffic – Local Roadways and Intersections: Improvements contained in mitigation measures MM TRA-1 through MM TRA-8 have been identified which would result in acceptable levels of service at local intersections, ensure queues stay within

available pocket lengths at local intersections, and maintain acceptable levels of service on local roadways even with the addition of Project-related traffic. However, even with implementation of all feasible mitigation measures in the future General Plan Buildout scenario, these improvements would not fully mitigate cumulative level of service impacts at:

- Three intersections on Magnolia Avenue (Adams Street, Monroe Street, Jefferson Street);
- Five roadway segments on Magnolia Avenue (between Jefferson Street and Adams Street, between Adams Street and Campus View, between Campus View Drive and Monroe Street, between Monroe Street and Overland Street, between Overland Street and Jackson Street); and
- One roadway segment on Adams Street (between Garfield Street and Magnolia Avenue).

Consistent with the City's policy to maintain Magnolia Avenue as a 4-lane Special Boulevard, there is no reasonable and feasible mitigation available for the Magnolia Avenue intersection and roadway deficiencies. Although the Magnolia Avenue Specific Plan states the integration of a rapid bus transit system is a consideration for the reduction of traffic volumes along the Magnolia Avenue corridor, lacking any reasonable and feasible mitigation, traffic impacts at the Magnolia Avenue intersections and on Magnolia Avenue would remain significant and unavoidable.

- Transportation/Traffic – Regional Facilities: With the addition of Project-related traffic, level of service or pocket length deficiencies are forecast at:
  - Three intersections on Adams Street (SR-91 WB Ramps, SR-91 EB Ramps, and Indiana Avenue); and
  - One roadway segment on Adams Street, between the SR-91 ramps.

For the ramp intersections at Adams Street and the segment of Adams between the ramps to operate at a satisfactory level of service, improvements such as those being studied by the City and Caltrans as part of the SR-91/Adams Street Project Study Report (PSR) would be required. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the level of service from unsatisfactory to satisfactory. For these reasons, Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans.

The City Council finds that it has imposed all feasible mitigation to reduce the Project's significant impacts to a less than significant level. The City Council further finds that, except for the Project, all other alternatives set forth in the Draft EIR are infeasible because they would prohibit the realization of the Project objectives. Further analyses would be required to determine the full

impact of the alternatives should the City ever select another alternative as a project and as such, the other alternatives are hereby found to be infeasible.

## **6.5 Project Benefits**

The Riverside City Council, (i) having independently reviewed the information in the Final EIR and the record of proceedings; (ii) having made a reasonable and good-faith effort to eliminate or substantially lessen the impacts resulting from the Project to the extent feasible by adopting mitigation measures identified in the EIR and Mitigation Monitoring and Reporting Program (“MMRP”); and (iii) having balanced benefits of the Project against its significant and unavoidable environmental impacts, chooses to approve the Project despite its significant and unavoidable effects, because, in its view, specific economic, biological, social, technological, or other benefits of the Project render the significant effects acceptable in light of benefits.

The City Council finds that each of the following benefits is an overriding consideration, independent of the other benefits, that warrants approval of the Project notwithstanding the significant and unavoidable impacts. The Project would provide the following benefits:

- The Project implements the Objectives and land use designations of the General Plan 2025 by ensuring well-planned infill development along established transportation corridors; and improving or expanding the housing stock to support and compliment the major educational institutions and rapid bus transit in the Riverside community.
- The Project enables students to acquire knowledge, skills, and aspirations by providing academic programs that prepare students for professional careers that sustain economic development.
- The Project fosters an environment supporting the intellectual, physical, social, and spiritual development of each student so that they will become productive and good citizens in the communities they serve.
- The Project promotes a unified and recognizable campus identity that sustains an elevated community aesthetic by providing detailed architecture, signage, and landscaping guidelines.
- The Project creates meaningful and gainful employment by providing construction-related jobs, increased employment of faculty and staff, and developing a workforce to benefit the economy of Riverside and other communities.
- The Project supports existing and future local businesses by providing an increased customer base for local businesses. The increased customer base will also provide increased sales tax revenues.
- The Project produces performing arts and competitive sports venues that will promote the image of Riverside and attract visitors. Visitors will increase the demand for lodging and dining, which will increase sales tax revenues.

- The Project capitalizes on opportunities for diverse modes of transportation mobility by concentrating a population where key transportation infrastructure exists and where alternative forms of transportation can thrive.
- The Project preserves and protects cultural resources on the campus that reflect Riverside's history by establishing historic districts and guidelines for the treatment of each historic resource on campus.
- The Project implements environmentally sustainable practices by achieving higher energy efficiency and reducing long-term operating expenses through building design; waste diversion programs to aid the City in meeting legislative requirements; and sustainability measures that support the City's Green Action Plan.
- The Project site is located along major transportation corridors with proximate access to the Interstate freeway system and major roadways in an urban setting. Adding density to the campus acts to reduce vehicle miles traveled and takes advantage of existing infrastructure systems.
- The Project serves as a laboratory for technological development by implementing communication and workplace technologies and partnering with associated organizations to remain current on technological advancements.

## 6.6 Overriding Considerations

The following discussion provides the support of overriding considerations, which are a result of infeasible mitigation measures or alternatives to avoid the significant and unavoidable impacts that would result from the proposed Project.

### Economic Reasons

**The proposed Project provides economic benefits in the form of: (1) construction jobs; (2) permanent employment of faculty and staff; (3) workforce development; and (4) athletic and performing arts venues that attract visitors to Riverside. The proposed Project will continue to increased property tax revenue as the campus grows.**

#### Jobs

Temporary construction and long-term operational jobs created by the Project would result in increased spending throughout the region, including the City. During the construction phase of the proposed Project, direct jobs, that would be created, further increase indirect jobs in the City and in the economic region. Additionally, over the construction period, construction spending would add revenue to local and regional output. Construction spending would also increase local earnings and regional earnings. After construction, the development would create new on-site jobs as well as indirect jobs in the City and in the economic region.

The new gainful and meaningful faculty and staff jobs would be an increase over existing conditions. This increase in jobs would be an overall benefit to the local and regional economy.

The provision of additional jobs by maximizing employment on the Project site would support a better jobs-to-housing ratio and would reduce unemployment in the City.

New jobs associated with the Project are expected to include both manual occupations (e.g., building maintenance, landscaping, waste disposal) academic- based occupations (e.g., administrators, professors, teacher assistants) and support personnel (housing management, food service, security). Manual, academic and support-based occupations have the potential to pay relatively high wages, thereby contributing to the provision of jobs for a variety of income levels. Additionally, as discussed previously, the proposed Project would generate short-term construction-related and long-term operational jobs.

### **Tax Revenue**

The Project would have a positive fiscal impact on the City through construction and development of the Project, as well as throughout the life of the Project. As noted above, the construction and development of the site would produce a temporary economic stimulus as a result of one-time construction-related spending in the form of one-time development fees. These fees include city fees, sewer and water fees, transportation fees, and permit fees. In addition to the one-time payment of fees, property taxes and indirect sales taxes would be collected during this time and paid to the City. During the operational phase of the Project (during which time the campus is fully constructed and functional), additional revenues will be paid to the City in the form of property taxes, indirect sales tax, business license fees.

### **Market Demand Reasons**

The proposed Project has been designed to optimize the use of land within the campus, taking into consideration site constraints and applicable development standards. Further, California Baptist University has experienced extraordinary demand and growth since 2006 with a student enrollment increasing from 750 to 9,000 students. Additionally, this location would provide access to a full range of transportation infrastructure, including a large freeway system that connects to points within and outside the region.

### **Social Reasons**

The Project is a factory for workforce development and that fosters an environment supporting the intellectual, physical, social, and spiritual development of each student so that they will become productive and good citizens in the communities they serve. The Project includes historic districts to preserve and protect examples of Riverside history that exist within the campus.

### **Conclusion**

The City, after balancing the specific economic, social, and other benefits of the Project, has determined that the significant and unavoidable adverse environmental impacts identified may be

considered “acceptable” due to the specific considerations listed above, which outweigh the unavoidable, adverse environmental impacts of the Project.

Accordingly, the City of Riverside adopts the above statement of overriding considerations, recognizing that significant and unavoidable traffic/transportation impacts would result from implementation of the Project. Having (i) adopted all feasible mitigation measures; (ii) rejected alternatives to the proposed Project, as discussed above; and (iii) recognized all unavoidable significant impacts, the City hereby finds that each of the separate benefits of the Project, as stated herein, is determined to be unto itself an overriding consideration, independent of other benefits, that warrants approval of the Project and outweighs and overrides its unavoidable significant effects, and, thereby, justifies the approval of the Project.



## **Exhibit “B”**

### **Mitigation, Monitoring and Reporting Program**

## **1 INTRODUCTION**

The California Public Resources Code, Section 21081.6, requires that a lead or responsible agency adopt a mitigation monitoring plan when approving or carrying out a project when an Environmental Impact Report (EIR) identifies measures to reduce potential adverse environmental impacts. As lead agency for the project, the City is responsible for adoption and implementation of the mitigation monitoring plan.

A Draft EIR for the project has been prepared to address the potential environmental impacts and, where appropriate, recommend measures to mitigate these impacts. As such, a mitigation monitoring plan is required to ensure that the adopted mitigation measures are successfully implemented. This plan lists each mitigation measure, describes the methods for implementation and verification, and identifies the responsible party or parties.

## **2 MONITORING AND REPORTING PROCEDURES**

The City will be responsible for administering the mitigation monitoring plan and ensuring that all parties comply with its provisions. The City may delegate monitoring activities to staff, consultants, or contractors. The City will also ensure that monitoring is documented through periodic reports and that deficiencies are promptly corrected. The designated environmental monitor will track and document compliance with mitigation measures, note any problems that may result, and take appropriate action to rectify problems.

Table 1 lists each mitigation measure included in the Draft EIR. Certain inspections and reports may require preparation by qualified individuals and these are specified as needed. The timing and method of verification for each measure are also specified.

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**MITIGATION MONITORING AND REPORTING PROGRAM**

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**TABLE 1**  
**MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

<b>Mitigation Measure No.</b>	<b>Mitigation Measure</b>	<b>Timing of Implementation</b>	<b>Responsible Party</b>	<b>Monitoring/Reporting Method</b>
<b>AQ-1:</b>	All project construction plans shall include a specification requiring the application of nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).	Prior to building permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans.
<b>AQ-2:</b>	All project construction plans shall include a specification requiring the watering of active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).	Prior to grading permit issuance as part of the grading plan check review process.	Public Works Department	Approval of grading plans.  Periodic inspection by City.
<b>AQ-3:</b>	All project construction plans shall include a specification requiring the covering of all haul trucks transporting dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.	Prior to grading permit issuance as part of the grading plan check review process.	Public Works Department	Approval of grading plans.  Periodic inspection by City.
<b>AQ-4:</b>	All project construction plans shall include a specification requiring the paving of construction access roads at least 30 meters (100 feet) onto the site from the main road.	Prior to building permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans.
<b>AQ-5:</b>	All project construction plans shall include a specification limiting traffic speeds on all unpaved roads to 15 miles per hour or less.	Prior to grading and building permit issuance as part of the grading and building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	Approval of grading and building plans.  Periodic inspection by City.

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<b>AQ-6:</b>	All project construction plans shall include a specification requiring the recycling or reuse of at least 50 percent of the construction material (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard).	Prior to demolition permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans and demolition permit
<b>AQ-7:</b>	All project construction plans shall include a specification requiring the use of “green building materials” such as those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project, as specified on the CalRecycle website.	Prior to building permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans.  The project applicant shall prepare and submit a document to the City that verifies the feasibility of securing green building materials.
<b>AQ-8:</b>	Design all project buildings to meet or exceed the California Building Code’s (CBC) Title 24 energy standard, including, but not limited to, any combination of the following: <ul style="list-style-type: none"> <li>• Increase insulation such that heat transfer and thermal bridging is minimized;</li> <li>• Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and</li> <li>• Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures,</li> </ul>	Prior to building permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans.

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<b>Mitigation Measure No.</b>	<b>Mitigation Measure</b>	<b>Timing of Implementation</b>	<b>Responsible Party</b>	<b>Monitoring/Reporting Method</b>
	appliances, or other applicable electrical equipment.			
<b>AQ-9:</b>	For each increment of future development, construction plans shall include efficient lighting and lighting control systems and architectural designs shall incorporate daylight as an integral part of the lighting system in buildings.	Prior to building permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans.
<b>AQ-10:</b>	<p>For each increment of future development, construction plans shall include a comprehensive water conservation strategy appropriate for the project and its location. The strategy may include the following, plus other innovative measures that may be appropriate:</p> <ul style="list-style-type: none"> <li>• Create water-efficient landscapes within the development.</li> <li>• Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.</li> <li>• Use reclaimed water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water, if available.</li> <li>• Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals.</li> </ul>	Prior to building permit issuance as part of the building plan check review process.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building plans.

**TABLE 1**  
**MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<ul style="list-style-type: none"> <li>Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.</li> </ul>			
<b>BIO-1:</b>	<p>Initial ground-disturbing activities (e.g., demolition, grading) should be conducted outside the bird nesting season (February 15 through August 31). If project activities are planned during the bird nesting season, nesting bird surveys should be conducted within 30 days prior to disturbance to ensure birds protected under the MBTA are not disturbed by demolition-related activities such as noise and increased human presence.</p> <p>The survey shall consist of full coverage of the on-site trees. If no active nests are found, no additional measures are required. If active nests are found, the nest locations shall be mapped by the biologist utilizing GPS equipment. The nesting bird species will be documented and, to the degree feasible, the nesting stage (e.g., incubation of eggs, feeding of young, near fledging). The biologist shall establish a no-disturbance buffer around each active nest. The buffer will be determined by the biologist based on the species present and surrounding habitat. No construction or ground disturbance activities shall be conducted within the buffer until the biologist has determined the nest is no longer active and has informed the construction supervisor that activities may resume.</p>	30 days prior to any ground disturbance between February 15 to August 31.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Nesting Bird Survey Report submitted to City.

**MITIGATION MONITORING AND REPORTING PROGRAM**

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**TABLE 1**  
**MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

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<b>BIO-2:</b>	<p>Prior to the issuance of a tree removal permit for any future development within the open field areas along Magnolia Avenue that would require removal of heritage trees, the applicant shall submit to the City for review and approval, a report prepared by a certified arborist that identifies on-site heritage, significant and/or specimen trees. The arborist report shall contain the information required under Chapter 28, Title III of the City's Municipal Code, including (but not limited to) the following:</p> <ol style="list-style-type: none"><li>1. The location, size, health, age, and number of onsite significant, heritage or specimen trees; and</li><li>2. Recommendation(s) for preservation, relocation and/or replacement.</li></ol>	Prior to issuance of a tree removal permit.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Arborist Report submitted to City.
<b>CUL-1:</b>	<p>If the Hawthorne House is moved to 8712 and 8720 Magnolia Avenue, it shall be subject to an administrative Certificate of Appropriateness process and the following:</p> <ul style="list-style-type: none"><li>• Orient the main entrance to the Hawthorne House toward Magnolia Avenue, as was originally.</li><li>• The receiver is located within 1,000 feet of the Magnolia Avenue/ Monroe Street intersection.</li><li>• Place the Hawthorne House over the existing property line between 8712 and 8720 Magnolia Avenue to help with setback.</li></ul>	Prior to issuance of building permit.	Community & Economic Development Department, Planning, Historic Preservation, and Building & Safety Divisions.	Approval of a Certificate of Appropriateness.

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**MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<ul style="list-style-type: none"> <li>Develop a substantial interpretive feature for placement within the front setback of the new location to interpret the history of the Hawthorne House, illustrating its historic location across Monroe Street, including the uses of the property and the former windrow that included the Hawthorne eucalyptus tree.</li> <li>Design the landscaping of the house to allow an unobstructed view to the house from Magnolia Avenue.</li> </ul> <p>If the Hawthorne House is moved to a site further than 1,000 feet of the Magnolia Avenue/Monroe Street intersection, such relocation shall be reviewed by the Cultural Heritage Board. The following shall apply:</p> <ul style="list-style-type: none"> <li>A Certificate of Appropriateness shall be required.</li> <li>Commit to the exterior rehabilitation of the Hawthorne House including the landscaping of the property to be completed within one year after its relocation.</li> <li>In the interim between now and when the Hawthorne House is to be relocated, engage a restoration architect to develop a program to stabilize the residence to prevent deterioration.</li> </ul>			



**TABLE 1  
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	<ul style="list-style-type: none"> <li>Relocate the Cultural Heritage Landmark plaque from its current location to the new location of the Hawthorne House.</li> <li>Install a Cultural Heritage Landmark plaque at the location of the Hawthorne eucalyptus so that people can appreciate its historic association.</li> </ul> <p>This measure shall be implemented to the satisfaction of the Historic Preservation Staff of the City Planning Division.</p>			
<b>CUL-2:</b>	<p>Where alterations to the Rose Garden Village affect the exterior of the resource, the following treatments are required and subject to administrative Certificate of Appropriateness:</p> <ul style="list-style-type: none"> <li>Entry Doors: Where an entry door is to be removed, the former location of the door will be retained as a recessed space, with a smooth stucco finish painted the same color as the former door. Wooden trim associated with the former door will be retained and painted the same color as the recess.</li> <li>Sliding Patio Doors: Any replacement of eight-foot-wide patio doors shall occur with clear anodized storefront creating a vertically-divided opening framed in clear anodized aluminum. The lower glass of the storefront shall be given a</li> </ul>	Prior to issuance of building permit.	Community & Economic Development Department, Planning, Historic Preservation, and Building & Safety Divisions.	Approval of a Certificate of Appropriateness.

**TABLE 1**  
**MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

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	<p>frosted opaque finish as visible from the exterior. On the interior, this lower area shall be mated to an interior wall finished in drywall to match the balance of the interior walls. The balance of the eight-foot-wide openings shall be given a stucco finish to match the balance of the existing building walls.</p> <p>This measure shall be implemented to the satisfaction of the Historic Preservation Staff of the City Planning Division.</p>			
<b>CUL-3:</b>	<p>Prior to the issuance of grading permits, the applicant shall submit to the City for review and approval, evidence that qualified professional archeologist(s) has been retained to monitor ground-disturbing activities of native soil (e.g., vegetation removal, grading, excavation, removal of foundations, and/or trenching) occurring within 50 feet of the following CBU Facilities:</p> <ul style="list-style-type: none"> <li>• Lancer Outdoor Athletic Complex</li> <li>• Physical Plant/Shops (Facilities &amp; Planning Services Maintenance and Operations)</li> <li>• Lancer Arms</li> <li>• Former Riverside Lower Canal</li> <li>• Former San Carlos Apartments (The Point)</li> </ul>	Prior to issuance of grading permit.	Community & Economic Development Department, Planning and Building & Safety Divisions; Qualified Archaeological Monitor.	<p>Evidence that a qualified archaeological monitor has been retained shall be provided to the City.</p> <p>Completion of a Cultural Resources Monitoring Plan.</p>

**MITIGATION MONITORING AND REPORTING PROGRAM**

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	<p>The duration and frequency of monitoring shall be determined by the City in coordination with the archeologist(s). Factors determining the duration and frequency of monitoring shall include (but not be limited to) the rate of excavation and grading activities, the materials being excavated (fill or native soils), the depth of excavation, the location of excavation, and if found, the abundance and type of archaeological resources encountered.</p> <p>As determined appropriate by the City in coordination with the archaeologist(s), monitoring may be reduced or discontinued in areas where the archaeologist(s) determines on-site activities will not disturb archaeological resources.</p> <p>This mitigation measure, including the contact information of the project archaeologist, shall be incorporated in all construction contract documentation and be implemented to the satisfaction of the City Planning Division.</p>			
<b>CUL-4:</b>	<p>If archaeological resources are encountered during ground-disturbing activities, the archaeologist(s) shall be empowered to temporarily divert or redirect ground-disturbing activities in the vicinity in order to make an evaluation of the find. The archaeological monitor(s) shall notify the City, applicant, and appropriate Native American tribes should any such discovery be made during the course of ground-disturbing activities.</p>	<p>During grading and construction.</p>	<p>Community &amp; Economic Development Department, Planning and Building &amp; Safety Divisions; Project Applicant; Landowner; Qualified Archaeological Monitor.</p>	<p>Report prepared that documents the finding and disposition of any cultural resources; If resources are found and curated, a copy of the curation agreement shall be provided to the City; Completed monitoring Report.</p>

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	<p>The archaeologist(s) shall recommend appropriate treatment measures (i.e., avoidance, removal, or preservation in place) to reduce or avoid impacts to buried resources, and determine appropriate treatment, which may include preservation in place or the development and implementation of a testing/data recovery investigation treatment plan.</p> <p>Should the archaeologist(s) determine through consultation with the Native American tribes that the discovery is a resource pursuant to Section 15064.5, avoidance or other mitigation will be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2.</p> <p>A final report detailing the significance and treatment of discovered archaeological resources shall be prepared by the archaeologist and submitted to the City and the Eastern Information Center at University of California, Riverside. All cultural material, excluding sacred, ceremonial, grave goods, and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site shall be curated, as determined by the treatment plan, according to current professional repository standards.</p> <p>This mitigation measure, including the contact information of the archaeologist, shall be incorporated in all construction contract</p>			

**MITIGATION MONITORING AND REPORTING PROGRAM**

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	documentation and implemented to the satisfaction of the City Planning Division.			
<b>CUL-5:</b>	If any suspected archaeological resources are discovered during ground-disturbing activities and the archaeological monitor is not present, the construction supervisor is obligated to halt work within a 50-foot radius around the find and call the project archaeologist to the site to assess the significance of the find. The project archaeologist, the project applicant, and the City Planning Division shall confer regarding the disposition of the discovered resource(s). The project archaeologist shall monitor remaining earthmoving activities at the project site, and a treatment plan and/or preservation plan shall be prepared and reviewed by the project applicant and the City Planning Division and implemented by the project archaeologist to protect the identified cultural resource(s) from damage and destruction. A final report containing the significance and treatment findings shall be prepared by the project archaeologist and submitted to the City Planning Division and the Eastern Information Center at the University of California, Riverside. Any cultural material, excluding sacred, ceremonial, grave goods, and human remains, collected during construction and from any previous archaeological studies or excavations on the project site shall be curated, as	During grading and construction.	Community & Economic Development Department, Planning Division; Construction Supervisor; Qualified Archaeological Monitor.	If resources are found and curated, a copy of the curation agreement shall be provided to the City; Completed monitoring Report.

**TABLE 1**  
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	<p>determined by the treatment plan, according to current professional repository standards.</p> <p>This mitigation measure, including the contact information of the archaeologist, shall be incorporated in all construction contract documentation and implemented to the satisfaction of the City Historic Preservation and Planning Staff.</p>			
<b>CUL-6:</b>	<p>Prior to issuance of grading permits, the City shall verify that the following note is included on all grading plans of subsequent development projects executed pursuant to the California Baptist University Specific Plan:</p> <p>“If any suspected paleontological resources (fossils) are discovered during ground-disturbing activities, the construction supervisor is obligated to halt work within a 100-foot radius around the find until a qualified paleontologist can assess the significance of the find. The project paleontologist shall monitor remaining ground-disturbing activities in native soils at the project site and shall be equipped to record and salvage fossil resources that may be unearthed during construction. The paleontologist shall temporarily halt or divert construction equipment to allow recording and removal of the unearthed resources. Any fossils found shall be offered for curation at a curation facility approved by the City. A report of findings, including, when appropriate, an itemized inventory of recovered specimens and a discussion of their significance, shall be prepared</p>	Prior to grading permit issuance and during construction.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department; Construction Supervisor; Qualified Paleontological Monitor.	<p>Approval of grading plans.</p> <p>If paleontological resources are discovered, evidence that a qualified paleontological monitor has been retained shall be provided to the City.</p>

**MITIGATION MONITORING AND REPORTING PROGRAM**

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	upon completion of the steps outlined above. The report and inventory, when submitted to and approved by the appropriate lead agency, will signify completion of the program to mitigate impacts on paleontological resources.”  This measure shall be implemented to the satisfaction of the City Historic Preservation and Planning Staff.			
<b>GEO-1:</b>	Prior to any entitlements process for all future development projects administered under the CBUSP Amendment, the applicant shall commission site-specific, design-level geotechnical investigations by a certified engineering geologist or other qualified professionals for all grading and construction projects subject to geologic hazards, including fault rupture, severe ground shaking, liquefaction, landslides, collapsible or expansive soils, subsidence, manufactured slope stability (if applicable), and the engineering and construction of occupied or inhabited structures. The findings and recommendations contained in these reports shall be implemented prior to issuance of grading, building, and/or occupancy permits as applicable. As necessary, the City may require additional studies and/or engineering protocols to meet its requirements. This measure shall be implemented to the satisfaction of the Community & Economic Development Department, Building and Safety Division, or designee.	Prior to issuance of entitlements and prior to grading and building permit issuance.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	Submittal of Geotechnical Study to City.  Approval of grading permit or building permits as deemed applicable by City staff.

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**MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

<b>Mitigation Measure No.</b>	<b>Mitigation Measure</b>	<b>Timing of Implementation</b>	<b>Responsible Party</b>	<b>Monitoring/Reporting Method</b>
<b>GHG-1:</b>	<p>To ensure consistency with the City's RRG-CAP, the project shall design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following:</p> <ul style="list-style-type: none"> <li>• Increase insulation such that heat transfer and thermal bridging is minimized;</li> <li>• Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption;</li> <li>• Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment; and</li> <li>• Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.</li> </ul> <p>This measure shall be implemented to the satisfaction of the City Building and Safety Division.</p>	Prior to issuance of building permits.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building permit.
<b>GHG-2:</b>	To ensure consistency with the City's RRG-CAP and to implement the Water Conservation Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 7: Design Guidelines), future development resulting from	Prior to issuance of building permits.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building permit.



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	<p>implementation of the CBUSP shall devise a comprehensive water conservation strategy appropriate for the development and its location. The strategy may include the following, plus other innovative measures that may be appropriate:</p> <ul style="list-style-type: none"> <li>• Create water-efficient landscapes within the development.</li> <li>• Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.</li> <li>• Use reclaimed water or non-potable well water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water or non-potable well water, if available.</li> <li>• Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals.</li> <li>• Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.</li> </ul> <p>This measure shall be implemented to the satisfaction of the City Planning Division.</p>			

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<b>HAZ-1:</b>	Prior to issuance of a grading permit or prior to renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, a Phase I Environmental Site Assessment shall be conducted in accordance with American Society for Testing and Materials (ASTM) Standard of Practice E 1527-13, "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process." The findings and recommendations contained in the Phase I Environmental Site Assessment shall be implemented. As necessary, the City may require additional studies and/or remediative protocols to meet its requirements. This measure shall be implemented to the satisfaction of the City Community & Economic Development Director.	Prior to issuance of building and/or demolition permits for the renovation, rehabilitation, or demolition of structures constructed prior to 1978.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of grading plans.  Approval of demolition permit.  Phase I Environmental Site Assessment submitted to City.
<b>HAZ-2:</b>	Prior to renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, a lead-based paint, asbestos, and organochlorine pesticide (from termite applications) survey shall be conducted. Should lead-based paint, asbestos-containing materials, and/or organochlorine pesticides be identified during survey, abatement of these materials will be accomplished in accordance with local, State, and federal guidelines. This measure shall be implemented to the satisfaction of the City Community & Economic Development Director.	Prior to issuance of building and/or demolition permits for the renovation, rehabilitation, or demolition of structures constructed prior to 1978.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Lead-based paint, asbestos, and organochlorine pesticide assessment submitted to City.

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<b>HAZ-3:</b>	Prior to issuance of building permits for any new structure or remodeling that would increase the height of any existing structure, CBU (or its successor-in-interest, if applicable) shall submit documentation verifying that the structure's elevation above mean sea level (at top point, including all roof-mounted equipment and lighting, if applicable): (1) will not exceed the elevation of Runway 16-32 at its southerly terminus (747.5 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway; and, (2) will not exceed the elevation of Runway 9-27 at its easterly terminus (815 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway. If both of these requirements cannot be met for any given structure, the applicant shall file Form 7460-1 with the Federal Aviation Administration, and no building permit shall be issued until a "Determination of No Hazard to Air Navigation" is received from the Federal Aviation Administration and filed with the City of Riverside Planning Department, the City of Riverside Building and Safety Department, the Riverside County Airport Land Use Commission, and manager of Riverside Municipal Airport.	Prior to issuance of building permits for new structures or remodeling of existing structures that result in an increase in height.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Evidence that building height meets conditions (1) and (2) as stated HAZ-3 submitted to City.
<b>NOI-1:</b>	During construction for any project within the CBU Specific Plan Zone, the project contractor shall implement the following best management	During construction.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department; Project Applicant;	Periodic inspection during construction.

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	<p>practice measures during all construction activities:</p> <ul style="list-style-type: none"><li>• Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.</li><li>• Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site.</li><li>• Locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and noise-sensitive receptors nearest the active project site during all project construction.</li><li>• Avoid unnecessary idling by shutting off engines that are expected to idle for more than 5 minutes.</li><li>• Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaint (e.g., starting too early, bad muffler) and would determine and implement reasonable measures warranted to correct the problem.</li></ul>		Construction Contractor.	

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	This measure shall be implemented to the satisfaction of the City Planning, Building and Safety Divisions, and Public Works Department.			
<b>NOI-2:</b>	Prior to the issuance of entitlements, new development within the CBUSP Zone shall require an acoustical analysis for all noise-sensitive projects located in an area with noise levels greater than 60 dbA CNEL in order to comply with the City's noise and land use compatibility standards. All new residential land uses shall be designed to maintain an interior standard of 45 dBA CNEL during the daytime (7:00 a.m. to 10:00 p.m.) and 35 dBA CNEL during the nighttime (10:00 p.m. to 7:00 a.m.) or less. In addition, all new school land uses shall be designed to maintain a standard of 45 dBA CNEL or less in building interiors. Noise reduction measures to achieve this noise level could include forced air ventilation so that windows can remain closed and/or upgraded wall and window assemblies. This measure shall be implemented to the satisfaction of the City Planning Division.	Prior to issuance of entitlements.	Community & Economic Development Department, Planning Division.	Acoustical Analysis submitted to City.
<b>NOI-3:</b>	Prior to the issuance entitlements, a noise impact assessment shall be conducted for new development proposed within the CBUSP Zone that would result in potentially significant noise impacts within 300 feet of existing sensitive receptors. The noise impact assessment shall develop appropriate noise reduction measures to reduce noise levels consistent with the City's land	Prior to issuance of entitlements.	Community & Economic Development Department, Planning Division.	Acoustical Analysis submitted to City.

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	use compatibility standards. This measure shall be implemented to the satisfaction of the City Planning Division.			
<b>NOI-4:</b>	Prior to issuance of building permits, design considerations and shielding must be implemented to ensure that all HVAC equipment would be located, enclosed, shielded, or otherwise designed to reduce HVAC-related noise sources at the nearest sensitive receptors to 55 dBA at the property line. This measure shall be implemented to the satisfaction of the City Planning Division.	Prior to issuance of building permits.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building permits.
<b>NOI-5:</b>	Prior to the issuance of grading permits, development within the CBUSP Zone that will be located within 200 feet of historic structures, as determined by a California Historical Resource Status Code, shall require a vibration assessment demonstrating that FTA Groundborne Vibration Impact Criteria for the proposed land use are not exceeded. If necessary, the vibration assessment shall demonstrate project modifications required to ensure criteria compliance. This measure shall be implemented to the satisfaction of the City Planning Division.	Prior to issuance of grading permits.	Community & Economic Development Department, Planning and Historic Preservation Divisions.	Vibration Analysis submitted to City.
<b>TRA-1:</b>	Prior to the issuance of the first building permit, CBU shall construct Lancer Lane at Adams Street to include 2 inbound lanes and 3 outbound lanes having turning movements as approved by the City Traffic Engineer (1 left-turn lane, 1 through lane, 1 right-turn lane). The NB approach on	Prior to issuance of first building permit.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	Approval of first building permit.  Construction of street improvements.

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	Adams Street will be widened to include a second left turn lane, and provide 250 feet of storage for the left-turn lanes. The SB approach on Adams Avenue will be widened to include an additional thru lane. This internal roadway will continue to connect to Magnolia Avenue, and will serve as the primary internal roadway to the campus.			
<b>TRA-2:</b>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project, CBU shall contribute 50% of the required fair share payment and the remainder 50% fair share payment prior to the certificate of occupancy for Phase II of the South Campus Student Housing project, calculated to be 13.65%, for the following improvements to the Adams Street/Magnolia Avenue intersection:</p> <ul style="list-style-type: none"> <li>• Adams Street southbound approach – restripe to include 2-300 foot left-turn lanes within the existing roadway.</li> <li>• Adams Street northbound approach – restripe to include 2-240 foot left-turn lanes within the existing roadway.</li> <li>• Magnolia Avenue eastbound approach – modify the existing raised median to provide 265 feet of storage.</li> <li>• Magnolia Avenue westbound approach – modify the existing raised median to provide 365 feet of storage.</li> </ul>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project.</p> <p>Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.</p>	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	<p>Payment of fair share fees.</p> <p>Approval of certificate of occupancy.</p>

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	Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.			
<b>TRA-3:</b>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project, CBU shall contribute 50% of the required fair share payment and the remainder 50% fair share payment prior to the certificate of occupancy for Phase II of the South Campus Student Housing project, calculated to be 18.49%, for the following improvements to the Monroe Street/Magnolia Avenue intersection:</p> <ul style="list-style-type: none"> <li>• Monroe Street northbound approach – restripe to include 1-410 foot left-turn lane within the existing roadway.</li> <li>• Monroe Street southbound approach – restripe to include 1-215 foot left-turn lane within the existing roadway.</li> <li>• Magnolia Avenue eastbound approach – modify the existing raised median to provide 240 feet of storage.</li> <li>• Magnolia Avenue westbound approach – modify the existing raised median to provide 430 feet of storage.</li> </ul> <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at</p>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project.</p> <p>Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.</p>	Community & Economic Development Department, Planning and Building & Safety Division; Public Works Department.	<p>Payment of fair share fees.</p> <p>Approval of certificate of occupancy.</p>



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	which time may alter the required fair share percentage.			
<b>TRA-4:</b>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project, CBU shall contribute 50% of the required fair share payment and the remainder 50% fair share payment prior to the certificate of occupancy for Phase II of the South Campus Student Housing project, calculated to be 43%, to construct an exclusive eastbound right-turn lane with a minimum storage length of 100 feet on Magnolia Avenue at Adams Street and modifications to the signal phasing to include a right-turn overlap with the northbound left-turn phase.</p> <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project.</p> <p>Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.</p>	Community & Economic Development Department, Planning and Building & Safety Division; Public Works Department.	<p>Payment of fair share fees.</p> <p>Approval of certificate of occupancy.</p>
<b>TRA-5:</b>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project, CBU shall contribute 50% of the required fair share payment and the remainder 50% fair share payment prior to the certificate of occupancy for Phase II of the South Campus Student Housing project, calculated to be 14.50%, for the following improvements to the Adams Street/Garfield Avenue intersection:</p>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project.</p> <p>Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.</p>	Community & Economic Development Department, Planning and Building & Safety Division; Public Works Department.	<p>Payment of fair share fees.</p> <p>Approval of certificate of occupancy.</p>

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	<ul style="list-style-type: none"> <li>Garfield Street northbound approach – restripe to include 1-115 foot left-turn lane within the existing roadway.</li> </ul> <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>			
<b>TRA-6:</b>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project, CBU shall contribute 50% of the required fair share payment and the remainder 50% fair share payment prior to the certificate of occupancy for Phase II of the South Campus Student Housing project, calculated to be 11.01%, for the following improvements to the Magnolia Avenue/Jefferson Street intersection:</p> <ul style="list-style-type: none"> <li>Jefferson Street northbound approach – restripe to include 1-175 foot left-turn lane within the existing roadway.</li> <li>Jefferson Street southbound approach – restripe to include 1-200 foot left-turn lane within the existing roadway.</li> </ul> <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project.</p> <p>Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.</p>	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	<p>Payment of fair share fees.</p> <p>Approval of certificate of occupancy.</p>

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<b>TRA-7:</b>	Prior to the issuance of the certificate of occupancy of the East Parking Structure, installation of curb and gutter at 53 feet from monument centerline, sidewalk and matching paving on Adams Street from Lancer Lane/Briarwood Drive to the westbound 91 freeway on-ramp is required. The City has determined that the required improvements shall terminate at the Diana Avenue monument centerline along the Shell Gas Station's Adams Street frontage.	Prior to issuance of certificate of occupancy of the East Parking Structure.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	Approval of certificate of occupancy.  Construction of street improvements.
<b>TRA-8:</b>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project, CBU shall contribute 50% of the required fair share payment and the remainder 50% fair share payment prior to the certificate of occupancy for Phase II of the South Campus Student Housing project, calculated to be 6.67%, for the following improvements to the Magnolia Avenue/Monroe Street intersection.</p> <ul style="list-style-type: none"> <li>• Monroe Street northbound approach – restripe to include 1-410 foot left-turn lane within the existing roadway.</li> <li>• Monroe Street southbound approach – restripe to include 1-215 foot left-turn lane within the existing roadway.</li> <li>• Magnolia Avenue eastbound approach – modify the existing raised median to provide 240 feet of storage.</li> </ul>	<p>Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project.</p> <p>Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.</p>	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	<p>Payment of fair share fees.</p> <p>Approval of certificate of occupancy.</p>

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	<ul style="list-style-type: none"><li>• Magnolia Avenue westbound approach – modify the existing raised median to provide 430 feet of storage.</li></ul> <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>			