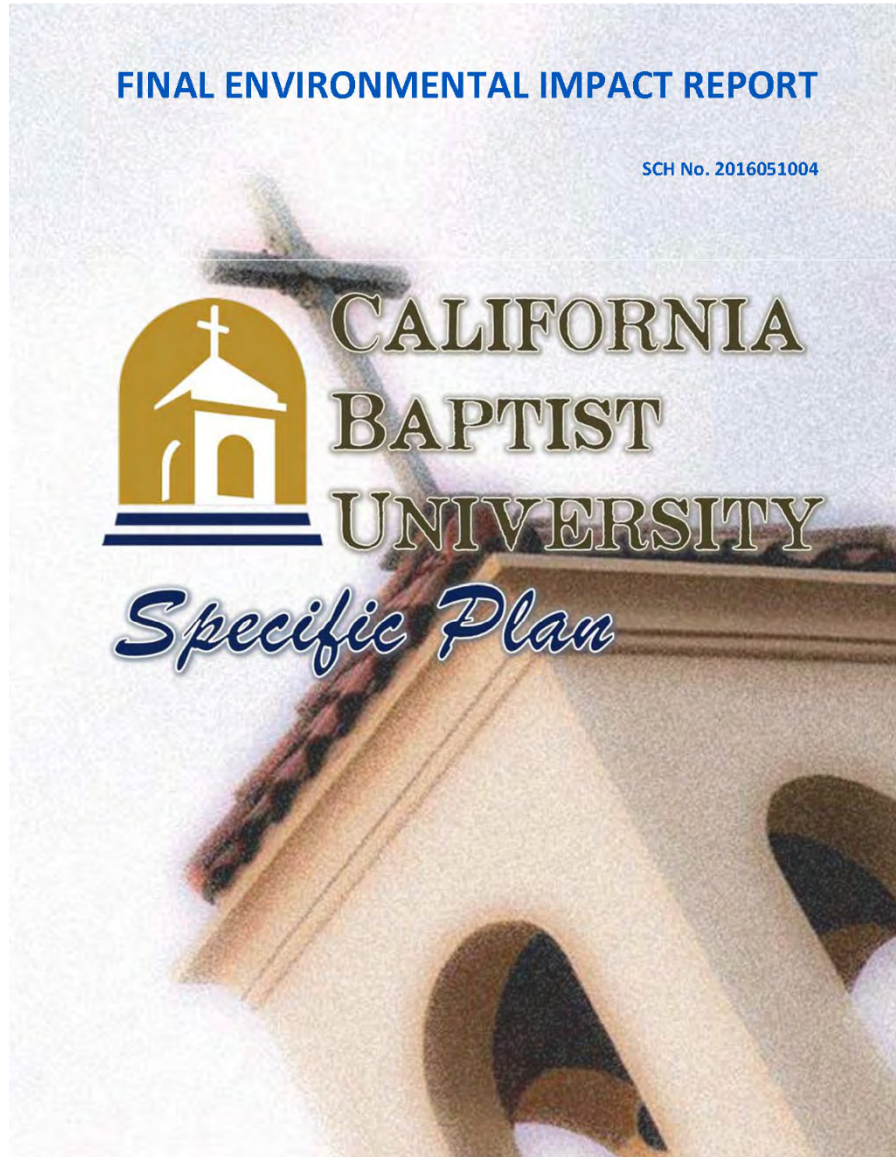


FINAL ENVIRONMENTAL IMPACT REPORT

SCH NO. 2016051004

CALIFORNIA BAPTIST UNIVERSITY SPECIFIC PLAN AMENDMENT PROJECT



LSA

December 13, 2018

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**CALIFORNIA BAPTIST UNIVERSITY SPECIFIC PLAN AMENDMENT
FINAL ENVIRONMENTAL IMPACT REPORT
SCH NO. 2016051004**

Project Applicant:

California Baptist University
8432 Magnolia Avenue
Riverside, California 92504
Contact: Steve Smith, Director of Facilities and Planning Services

Prepared for:

City of Riverside
Community & Economic Development Department
Planning Division
3900 Main Street, Third Floor
Riverside, California 92522
Contact: Candice Assadzadeh, Senior Planner
Phone: (951) 826-5667

Prepared by:

LSA Associates, Inc.
1500 Iowa Avenue, Suite 200
Riverside, California 92507
Contact: Ray Hussey
Phone: (951) 781-9310

Project No. CTR1501

December 13, 2018

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CHAPTER 1.0 INTRODUCTION

1.1 PURPOSE

The City of Riverside (City), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Final Environmental Impact Report (Final EIR) for the proposed California Baptist University Specific Plan Amendment Project (Project). The State Clearinghouse (SCH) number for the EIR is SCH 2016051004.

This Final EIR contains all of the required contents as outlined in Section 15132 of the CEQA Guidelines, including:

- The Draft EIR or a revision to the draft;
- A list of persons, organizations, and public agencies commenting on the Draft EIR;
- Comments and recommendations received on the Draft EIR;
- The responses of the lead agency to significant environmental points raised in the comments and recommendations received on the Draft EIR; and
- Any other information added by the lead agency.

This Final EIR for the Project consists of comments and responses to comments and a mitigation monitoring plan for the Project. This Final EIR is intended to be used along with the Draft EIR, which is incorporated by reference and bound separately.

This Final EIR assembles all the environmental data and analyses that have been prepared for the Project. It also includes public and agency comments on the Draft EIR and responses by the City to those comments. The intent of the Final EIR is to provide a forum to air and address comments pertaining to the analysis contained in the Draft EIR and to provide an opportunity for clarification, corrections, or minor revisions to the Draft EIR as needed.

The evaluation and response to comments is an important part of the CEQA process because it allows the following:

- The opportunity to review and comment on the methods of analysis contained in the Draft EIR;
- The ability to detect any omissions that may have occurred during the preparation of the Draft EIR;
- The ability to check for accuracy of the analysis contained within the Draft EIR;
- The ability to share expertise; and

- The ability to discover public concerns.

1.2 INFORMATION ADDED FOLLOWING DISTRIBUTION OF THE DEIR

The information added following distribution of the DEIR does not constitute “significant new information” pursuant to State CEQA Guidelines Section 15088.5 because this information does not change the Project impacts and/or mitigation measures such that new or more severe environmental impacts result from the Project. The information is added to provide clarification and/or make minor corrections. The additional information merely “clarifies or amplifies or makes insignificant modifications” in the already adequate DEIR, as is permitted by State CEQA Guidelines Section 15088.5(b).

1.3 RELATIONSHIP TO THE DEIR

The Errata to the DEIR includes changes as revised pages that clarify or correct minor inaccuracies in the DEIR.

1.4 PUBLIC REVIEW SUMMARY

A Draft EIR was prepared for the project and circulated for public review from September 21, 2018 to November 5, 2018 through the Governor’s Office of Planning and Research (the State Clearinghouse) and the Riverside County Clerk. Copies of the Draft EIR and Appendices were made available at the City of Riverside, Community Development Department, Planning Division (3900 Main Street, Third Floor, Riverside, California 92522), as well as at the Riverside Main Library (3581 Mission Inn Avenue, Riverside, California 92501) and the Riverside Public Library, Arlington Branch (92556 Magnolia Avenue, Riverside, CA 92503).

The City used several methods to elicit comments on the Draft EIR. The notice of availability (NOA) was mailed to various agencies and organizations, and individuals that had previously requested such notice. The Draft EIR and Appendices were also posted on the City of Riverside Planning Division website at <http://www.riversideca.gov/planning>.

Written comments were received during the public review period of the Draft EIR. Pursuant to Section 15088 of the CEQA Guidelines, the City, as the lead agency for the project, has reviewed the single comment letter received during the 45 day public review period on the Draft EIR. Two comment letters were received subsequent to the close of the Draft EIR public review period. A response to all correspondence including the late arriving letters is contained within Chapter 2, Comments Received and Responses to Comments, of this Final EIR.

CHAPTER 2.0

COMMENTS RECEIVED AND RESPONSES TO COMMENTS

2.1 INTRODUCTION

In accordance with Section 15088 of Title 14 of the California Code of Regulation (California Environmental Quality Act (CEQA) Guidelines), the City has evaluated the single comment letter received during the 45 day public review period on the Draft Environmental Impact Report (EIR) for the California Baptist University Specific Plan Amendment Project as well as two comment letters received after the close of the Draft EIR public review period. The City has prepared a written response to the comment letters including the two letters that arrived after the close of the 45 day Draft EIR public review period. In addition to the comment letters, the City received a letter from the Governor's Office of Planning and Research, State Clearinghouse, confirming that no state agencies provided comment on the Draft EIR. This chapter contains a copy of the three comment letters received during the public review process, and provides an evaluation and written response for each comment.

2.2 COMMENTS RECEIVED

During the public review period from September 21, 2018 to November 5, 2018, the City received one comment from Lozeau Drury LLP on behalf of Laborers International Union of North America, Local Union No. 1184 (LIUNA). The commenter's letter has been given a letter designation of "A" as follows:

- Letter A – Lozeau Drury LLP, letter dated October 4, 2018.

After the close of the Draft EIR public review period, the City received a second letter from Lozeau Drury LLP on behalf of LIUNA and an email from the Coalition for Fair Employment in Construction (CFEC). The late arriving letter and email correspondence have been given the letter designations "B" and "C" as follows:

- Letter B – Lozeau Drury LLP, letter dated November 27, 2018.
- Letter C – Coalition for Fair Employment in Construction, email dated November 28, 2018.

2.3 COMMENTS AND RESPONSES TO COMMENTS

This section includes all written comments on the Draft EIR received by the City and the responses to those comments in accordance with Section 15088 of the CEQA Guidelines. In

2.0 – COMMENTS RECEIVED AND RESPONSES TO COMMENTS

accordance with the CEQA Guidelines, responses are prepared for those comments that address the sufficiency of the environmental document regarding the adequate disclosure of environmental impacts and methods to avoid or mitigate those impacts. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the Draft EIR. Additionally, it should be noted that comments by public agencies should be limited to those aspects of a project that are within its area of expertise or which are required to be carried out or approved by the agency, and such comments must be supported by substantial evidence (CEQA Guidelines Section 15204).



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
richard@lozeaudrury.com

Via Email and U.S. Mail

October 4, 2018

Candice Assadzadeh, Senior Planner
City of Riverside
Community & Economic Development Department
Planning Division
3900 Main St. 3rd Floor
Riverside, CA 92522
cassadzadeh@riversideca.gov

Re: Comment on Draft Environmental Impact Report, California Baptist
University Specific Plan Amendment (State Clearinghouse #2016051004,
GPA P15-0989, ZC P15-0987 and SPA P17-0543)

Dear Ms. Assadzadeh:

I am writing on behalf of Laborers International Union of North America, Local Union No. 1184 and its members living in and around the City of Riverside ("LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as California Baptist University Specific Plan Amendment (State Clearinghouse #2016051004, GPA P15-0989, ZC P15-0987 and SPA P17-0543) for California Baptist University, including all actions related or referring to the proposed construction 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 with incidental office space as well as new and reconfigured educational, housing, administrative support, athletic, and other facilities located generally at 8432 Magnolia Avenue, APNs: 193-253-013, 193-321-034, -035, 193-322-028, 231-020-005 to 231-020-010, 231-020-026, 231-030-024, 231-030-027 to -029, 231-040-003, -004, 231-040-006, -007, 231-040-012, 231-040-014, 231-040-017, 231-040-023, 231-040-025, 231-040-027, 231-050-004, -005, 231-061-001 to 231-061-017, 231-070-007, 231-070-016, -017, 231-080-005, 231-080-009, 231-080-026 to -028, 231-090-067 in the City of Riverside ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts. LIUNA request that the Community & Economic Development Department

October 4, 2018

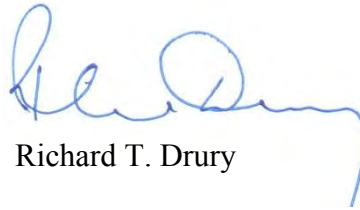
Comment on Draft Environmental Impact Report, California Baptist University Specific Plan Amendment (State Clearinghouse #2016051004, GPA P15-0989, ZC P15-0987 and SPA P17-0543)

Page 2 of 2

address these shortcomings in a revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

↑
A-1

Sincerely,



Richard T. Drury

Response to Comment Letter A

Lozeau Drury LLP

October 4, 2018

Comment A-1. The comment states that the “DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project’s impacts.” The comment goes on to state “LIUNA request that the Community & Economic Development Department address these shortcomings in a Revised Draft Environmental Impact Report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project.”

The comment provided does not provide the City with the “opportunity to receive and respond to articulated factual issues and legal theories before its actions are subjected to judicial review.” (*Coalition for Student Action v. City of Fullerton* (1984) 153 Cal.App.3d 1194, 1198.) “[O]bjections must be sufficiently specific so that the agency has the opportunity to evaluate and respond to them.” (*Citizens for Responsible Equitable Environmental Development v. City of San Diego* (2011) 196 Cal.App.4th 515, 521). Recirculation of an Environmental Impact Report (EIR) prior to certification by the lead agency is required when significant new information is added to the EIR after public notice is given of the availability of the Draft EIR (DEIR) for public review and comment, but before the Final EIR (FEIR) is certified by the lead agency. (CEQA Guidelines, § 15088.5.). As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. Recirculation of a DEIR is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. (CEQA Guidelines, § 15088.5 (a), (b).). The commenter provides no evidence, substantial or otherwise, that the DEIR is inadequate or requires significant new information. The DEIR was prepared in accordance with the requirements of the State CEQA Guidelines and the City’s local guidelines for implementing CEQA and contains a thorough analysis of the Project’s potential environmental impacts to all of the environmental issues in Appendix G of the State CEQA Guidelines.

This comment does not identify any significant new environmental issues or impacts that were not already addressed in the DEIR.



T 510.836.4200
F 510.836.4205

410 12th Street, Suite 250
Oakland, Ca 94607

www.lozeaudrury.com
doug@lozeaudrury.com

Via Email

November 27, 2018

Maartin Rossouw, Chair
Attn.: Frances Andrade
Planning Commission, City of Riverside
3900 Main St. 3rd Floor
Riverside, CA 92522
fandrade@riversideca.gov

Re: Comment on Draft Environmental Impact Report, California Baptist
University Specific Plan Amendment (State Clearinghouse #2016051004,
GPA P15-0989, ZC P15-0987 and SPA P17-0543)

Dear Mr. Rossouw:

I am writing on behalf of Laborers International Union of North America, Local Union No. 1184 and its members living in and around the City of Riverside ("LIUNA") regarding the Draft Environmental Impact Report ("DEIR") prepared for the Project known as California Baptist University Specific Plan Amendment (State Clearinghouse #2016051004, GPA P15-0989, ZC P15-0987 and SPA P17-0543) for California Baptist University, including all actions related or referring to the proposed construction 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 with incidental office space as well as new and reconfigured educational, housing, administrative support, athletic, and other facilities located generally at 8432 Magnolia Avenue, APNs: 193-253-013, 193-321-034, -035, 193-322-028, 231-020-005 to 231-020-010, 231-020-026, 231-030-024, 231-030-027 to -029, 231-040-003, -004, 231-040-006, -007, 231-040-012, 231-040-014, 231-040-017, 231-040-023, 231-040-025, 231-040-027, 231-050-004, -005, 231-061-001 to 231-061-017, 231-070-007, 231-070-016, -017, 231-080-005, 231-080-009, 231-080-026 to -028, 231-090-067 in the City of Riverside ("Project").

After reviewing the DEIR, we conclude that the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts with respect, at a minimum, to air quality impacts, traffic impacts, and impacts to biological resources. LIUNA request that the Planning Division address these shortcomings in a

November 27, 2018

Comment on Draft Environmental Impact Report, California Baptist University Specific Plan Amendment (State Clearinghouse #2016051004, GPA P15-0989, ZC P15-0987 and SPA P17-0543)

Page 2 of 2

revised draft environmental impact report (“RDEIR”) and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project. *Galante Vineyards v. Monterey Peninsula Water Management Dist.*, 60 Cal. App. 4th 1109, 1121 (1997).

↑
B-1

Sincerely,



Douglas Chermak

Response to Comment Letter B

Lozeau Drury LLP
November 27, 2018

Comment B-1. Similar to Comment A-1 (see Letter A), Comment B-1 makes the same claim as contained in commenter's prior letter but adds that "...the DEIR fails as an informational document and fails to impose all feasible mitigation measures to reduce the Project's impacts *with respect, at a minimum, to air quality impacts, traffic impacts, and impacts to biological resources.*" Using the same text as contained in Comment A-1, Comment B-1 goes on to state "LIUNA request that the Community & Economic Development Department address these shortcomings in a revised draft environmental impact report ("RDEIR") and recirculate the RDEIR prior to considering approvals for the Project. We reserve the right to supplement these comments during review of the Final EIR for the Project and at public hearings concerning the Project."

Although Comment B-1 is general and does not provide any rationale in support of commenter's claim that the DEIR fails to impose all feasible mitigation measures to reduced Project impacts associated with air quality, traffic, and biological resources, the following three discussions provides detailed and specific responses to the general comment.

Feasible Air Quality Mitigation Measures

Draft EIR Section 4.3 Air Quality contains a comprehensive and detailed analysis of potential air quality impacts from the proposed Project based on a technical study (see Draft EIR Appendix B). All potential impacts associated with temporary regional air pollution emissions during Project construction were rendered less than significant with implementation of **Mitigation Measure AQ-1** through **Mitigation Measure AQ-7**. Similarly, all potential impacts associated with permanent regional air pollution emissions during Project operations were rendered less than significant with implementation of **Mitigation Measure AQ-8** through **Mitigation Measure AQ-10**. In addition, **Mitigation Measure AQ-1** through **Mitigation Measure AQ-10** are reasonable and feasible measures because they clearly outline when, who, and what needs to be done to successfully implement each measure. All other potential air quality impacts were determined to be less than significant and mitigation is not required. For these reasons, the City has fully addressed the potential for air quality impacts, identified feasible mitigation to reduce impacts to less than significant, and therefore commenter's claim that the City has not imposed all feasible air quality mitigation is inaccurate.

Feasible Traffic Mitigation Measures

Draft EIR Section 4.16 Transportation and Traffic contains a comprehensive and detailed analysis of potential traffic impacts from the proposed Project based on a technical study (see Draft EIR Appendix G). The traffic analysis evaluated Project traffic impacts to intersection levels of service and queuing, roadway segment levels of service, and freeway merge/diverge levels of service. Project traffic impacts as defined by these analytical metrics were conducted for existing, existing plus ambient growth plus cumulative, and General Plan Buildout scenarios.

With six exceptions, potential traffic impacts to intersections were rendered less than significant with implementation of **Mitigation Measure TRA-1** through **Mitigation Measure TRA-6** and **Mitigation Measure TRA-8**. The exceptions are the intersections of Adams Street/Magnolia Avenue, Adams Street/SR-91 Westbound Ramp, Adams Street/SR-91 Eastbound Ramp, Adams Street/Indiana Avenue, Magnolia Avenue/Monroe Street, and Magnolia Avenue/Jefferson Avenue. Intersection improvements to the three intersections on Adams Street (SR-91 Eastbound Ramp, SR-91 Westbound Ramp, and Indiana Avenue) that would improve levels of service are being studied by the City and Caltrans as part of the SR-91/Adams Street Project Study Report (PSR). Because intersections between freeway ramps and local arterials are under the jurisdiction of Caltrans, the timing and funding of such improvements is not directly in the City's control and 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, the Draft EIR determined Project impacts to these three intersections were **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans. Regarding the three intersections on Magnolia Avenue (Adams Street, Monroe Street, and Jefferson Street), improvements are limited due to the City's policy regarding widening of Magnolia Avenue. The Magnolia Avenue corridor is anticipated to operate at LOS E as a 4-lane Special Boulevard in the General Plan. Although the Magnolia Avenue Specific Plan states the integration of a rapid bus transit system may reduce traffic volumes along the Magnolia Avenue corridor resulting in improved intersection levels of service, lacking any reasonable and feasible mitigation the Draft EIR determined Project impacts to the three intersections were **significant and unavoidable**.

With seven exceptions, potential traffic impacts to roadway segments were rendered less than significant with implementation of **Mitigation Measure TRA-7**. The exceptions are the roadway segment on Adams Street between the SR-91 Westbound and Eastbound Ramps, Adams Street between Garfield Street and Magnolia Avenue, and the five segments on Magnolia Avenue between Jefferson Street and Jackson Street. For roadway segment on Adams Street between the SR-91 Ramps, widening of Adams Street would be required. Such widening is being considered as part of the SR-91/Adams Street, PSR described above, and in the Draft EIR. For the same reasons as described above, the Draft EIR determined Project impacts to this segment of roadway were **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans. For the roadway segment on Adams Street between Garfield Street and Magnolia, widening would be required. The feasibility of widening Adams Street in this location

is limited by adjacent single family homes and the Magnolia Avenue Baptist Church. For this reason, the Draft EIR determined widening to a 6 lane roadway is not feasible and impacts were **significant and unavoidable**. For the five segments of roadway on Magnolia Avenue between Jefferson Street and Jackson Street, improvements are limited due to the City's policy regarding widening of Magnolia Avenue. As described above and in the Draft EIR, Magnolia Avenue is a 4-lane Special Boulevard in the General Plan and will not be widened to 6 lanes. Therefore, lacking any reasonable and feasible mitigation, the Draft EIR determined Project impacts to these Magnolia Avenue roadway segments were **significant and unavoidable**.

With one exception, potential traffic impacts to freeway merge/diverge locations were determined to be less than significant and no mitigation was required. The exception is the SR 91 Eastbound On-ramp at Adams Street. To improve operations at this freeway segment, capacity-enhancing freeway mainline lanes improvements would be required such as auxiliary or mainline lane improvements being studied by the City and Caltrans as part of the previously referenced SR-91/Adams Street PSR. For the same reasons as described above, the Draft EIR determined Project impacts to this freeway merge/diverge location was **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans.

For these reasons, the City has fully addressed the potential for traffic impacts, identified feasible mitigation to reduce impacts to less than significant, and identified why there are no feasible mitigation measures for specific intersection, roadway segment, and freeway merge/diverge location impacts. Therefore, commenter's claim that the City has not imposed all feasible traffic mitigation is inaccurate.

Feasible Biological Resources Mitigation Measures

Draft EIR Section 4.4 Biological Resources contains a comprehensive and detailed analysis of potential biological resources impacts from the proposed Project based on a technical study (see Draft EIR Appendix C). All potential temporary construction impacts to the burrowing owl were rendered less than significant with implementation of **Mitigation Measure BIO-1**. Similarly, all potential temporary construction impacts to heritage trees along Magnolia Avenue were rendered less than significant with implementation of **Mitigation Measure BIO-2**. All other potential biological resources impacts were determined to be less than significant and mitigation is not required. For these reasons, the City has fully addressed the potential for biological resources impacts, identified feasible mitigation to reduce impacts to less than significant, and therefore commenter's claim that the City has not imposed all feasible biological resources mitigation is inaccurate.

From: ericchristen <ericdchristen@gmail.com>

Sent: Wednesday, November 28, 2018 1:56 PM

To: Andrade, Frances <FANDRADE@riversideca.gov>

Subject: [External] URGENT: Construction Unions Are Using Environmental Extortion on the Project You Are Considering

Importance: High

This email's attachments were cleaned of potential threats by The City of Riverside's Security Gateway.
Click [here](#) if the original attachments are required (justification needed).

Please forward to planning commissioners.

Thank you.



Good Afternoon City Planning Commissioners.

My name is Eric Christen and I am the Executive Director of the [Coalition for Fair Employment in Construction \(CFEC\)](#). CFEC was formed 20 years ago by union and non-union contractors to oppose union-only requirements on construction that certain trade union leaders push, specifically “agreements” called Project Labor Agreements (PLAs). The tactics they employ to get these discriminatory “agreements” put into place include the one they are now using on a project you will be considering tomorrow (Thursday) and the tactic is what we call “greenmail.” Greenmail is the use of the California Environmental Quality Act (CEQA) to extort owners into “agreeing” to a PLA. Should they fail to do so unions and the law firms that serve as their front men threaten to hold up a project until the owner can be shown the light. We track every instance of greenmail in California as you can see be going to our website www.phonyuniontreehuggers.com

C-1

The [California Baptist University project you will be considering](#) is currently a target for greenmail. Attached is the letter that was sent by one of the union legal front groups to your staff regarding this project.

This law firm is one of the two that trade unions use around the state to employ greenmail. As you can see below their use of greenmail is extensive.

The Laborers Union: California’s Champion of the Environment

Laborers (LIUNA) Local Union 1184	February 24, 2014	Gideon Kracov	McCoy Solar Energy Project	FEIR Comments	County of Riverside
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Laborers (LIUNA) Local Union 783	January 3, 2017	Lozeau Drury	Colony Commerce Center Specific Plan	DEIR Comments	City of Ontario
Laborers (LIUNA) Local Union 783	November 10, 2016	Lozeau Drury	Renaissance Specific Plan	RDSEIR Comments	City of Rialto
Laborers (LIUNA) Local Union 783	August 19, 2016	Lozeau Drury	Renaissance Specific Plan	DSEIR Comments	City of Rialto
Laborers (LIUNA) Local Union 89	March 22, 2017	Lozeau Drury	Merge 56 Development	DEIR Comments	City of San Diego
Laborers (LIUNA) Union Local 1184	May 9, 2018	Lozeau Drury	750 Marlborough Avenue Warehouse	Withdrawal of Appeal Because City Council Will Hold Hearing	City of Riverside
Laborers (LIUNA) Union Local 1184	May 8, 2018	Lozeau Drury	750 Marlborough Avenue Warehouse	IS/MND - Appeal to City Council of Development Review Committee Approval	City of Riverside
Laborers (LIUNA) Union Local 1184	February 1, 2018	Lozeau Drury	750 Marlborough Avenue Warehouse	IS/MND Comments	City of Riverside
Laborers (LIUNA) Union Local 1184	April 27, 2018	Lozeau Drury	750 Marlborough Avenue Warehouse	Public Meeting Access Request - Development Review Committee	City of Riverside
Laborers (LIUNA) Union Local 1184	July 2, 2018	Lozeau Drury	Brodiaea Commerce Center	DEIR Comments	City of Moreno Valley
Laborers (LIUNA) Union Local 1184	September 30, 2016	Lozeau Drury	Center Street Project	Draft IS/MND Comments	City of Riverside
Laborers (LIUNA) Union Local 1184	March 6, 2018	Lozeau Drury	Center Street Project	Agreement with Developer Resolving Issues	City of Riverside
Laborers (LIUNA) Union Local 1184	July 13, 2016	Lozeau Drury	Hidden Canyon Industrial Park	EIR Addendum Supplemental Comments to Planning Commission	City of Beaumont
Laborers (LIUNA) Union Local 1184	September 30, 2016	Lozeau Drury	Perris Gateway Commerce Center	IS/MND Comments	City of Perris

Laborers (LIUNA) Union Local 1184	April 23, 2014	Lozeau Drury	ProLogis Eucalyptus Industrial Park	FEIR Comments	City of Moreno Valley
Laborers (LIUNA) Union Local 1184	January 20, 2015	Lozeau Drury	Section 24 Specific Plan - Agua Caliente Band of Cahuilla Indians	DEIS Supplemental Comments	City of Rancho Mirage et al.
Laborers (LIUNA) Union Local 1184	January 16, 2015	Lozeau Drury	Section 24 Specific Plan - Agua Caliente Band of Cahuilla Indians	DEIS Comments	City of Rancho Mirage et al.
Laborers (LIUNA) Union Local 1184	September 22, 2016	Lozeau Drury	Sycamore Canyon Business Park Buildings 1 and 2	DEIR Comments	City of Riverside
Laborers (LIUNA) Union Local 1184	December 14, 2016	Lozeau Drury	Sycamore Canyon Business Park Buildings 1 and 2	FEIR Comments	City of Riverside
Laborers (LIUNA) Union Local 1184	June 10, 2015	Lozeau Drury	World Logistics Center Project	FEIR Comments	City of Moreno Valley
Laborers (LIUNA) Union Local 185	July 9, 2018	Lozeau Drury	Natomas Crossing Quadrant B (Quad B) Office Project aka Centene	Appeal to City Council of CEQA Findings Approved by Planning Commission	City of Sacramento
Laborers (LIUNA) Union Local 185	August 2, 2018	Lozeau Drury	The Core Natomas	IS/MND Comments	City of Sacramento
Laborers (LIUNA) Union Local 261	May 18, 2018	Lozeau Drury	1201 and 1241 Evans Avenue	Notice Request	City of San Francisco
Laborers (LIUNA) Union Local 270	March 30, 2018	Lozeau Drury	2305 Mission College Boulevard Data Center	IS/MND Comments	City of Santa Clara
Laborers (LIUNA) Union Local 270	June 12, 2018	Lozeau Drury	2305 Mission College Boulevard Data Center	IS/MND - Supplemental Comments on Appeal to Planning Commission of Architectural Committee Approval	City of Santa Clara
Laborers (LIUNA) Union Local 270	May 29, 2018	Lozeau Drury	Agrihood	DEIR Comments	City of Santa Clara

Laborers (LIUNA) Union Local 300	December 19, 2017	Lozeau Drury	Vermont Corridor Project	DEIR Comments	County of Los Angeles
Laborers (LIUNA) Union Local 304	May 10, 2018	Lozeau Drury	New Buildings at Former Morton Salt Plant	Design Review - Comments to City Council	City of Newark
Laborers (LIUNA) Union Local 304	March 6, 2018	Lozeau Drury	Zeiss Innovation Center	Supplemental IS/MND Comments to City Council	City of Dublin
Laborers (LIUNA) Union Local 304	February 13, 2018	Lozeau Drury	Zeiss Innovation Center	Supplemental IS/MND Comments to Planning Commission	City of Dublin
Laborers (LIUNA) Union Local 324	February 15, 2018	Lozeau Drury	500 Pittsburg Avenue in Richmond - Warehouse Distribution Facility	Notice Request	County of Contra Costa
Laborers (LIUNA) Union Local 324	June 7, 2018	Lozeau Drury	The Village Student Housing Project	FEIR Comments	City of Arcata
Laborers (LIUNA) Union Local 783	September 15, 2016	Lozeau Drury	CapRock Distribution Center III Warehouse	DEIR Comments	City of Rialto
Laborers (LIUNA) Union Local 783	March 22, 2016	Lozeau Drury	Kimball Business Park	Notice Request	City of Chino
Laborers (LIUNA) Union Local 783	April 7, 2016	Lozeau Drury	Kimball Business Park	DEIR Comments	City of Chino
Laborers (LIUNA) Union Local 783	May 24, 2016	Lozeau Drury	Project Jupiter Distribution Warehouse	IS/MND Comments	Town of Apple Valley
Laborers (LIUNA) Union Local 783	October 7, 2016	Lozeau Drury	ProLogis Rialto I-210 DC #5	IS/MND Comments	ProLogis Rialto I-210 DC #5
Laborers (LIUNA) Union Local 783	April 11, 2016	Lozeau Drury	Sierra Lakes Commerce Center	RDEIR Comments	City of Fontana
Laborers (LIUNA) Union Local 783	March 1, 2016	Lozeau Drury	Waterman Industrial Center	IS/MND Comments	City of San Bernardino
Laborers (LIUNA) Union Local 89	March 13, 2014	Lozeau Drury	Cuyama Solar Array Project	DEIR Comments	County of Santa Barbara

Laborers (LIUNA) Union Local 89	August 25, 2016	Lozeau Drury	Pure Water Program North City Project	Notice Request	City of San Diego
Laborers (LIUNA) Union Local 89	March 3, 2014	Lozeau Drury	Soitec Solar Development Project	DEIR Comments	County of San Diego
Southwest Regional Council of Carpenters and Laborers (LIUNA) Union Local 300	October 16, 2017	Lozeau Drury	ICON at Panorama	Revised DEIR Comments	City of Los Angeles

We at CFEC would like you to know that we stand ready to help you navigate this thicket. We have 20 years of experience in doing this and would like to put that to use for you if needed.

Please do not allow this naked act of extortion to dissuade you from the merits of this project. In fact it is our hope that you will call this legal firm and the unions out tomorrow regarding their scheme.

Sincerely,

Eric Christen
Executive Director
Coalition for Fair Employment in Construction
www.opencompca.com
858-431-6337

Response to Comment Letter C

Coalition for Fair Employment in Construction November 28, 2018

Comment C-1. The email correspondence does not address any environmental issues or impacts. Rather, the correspondence states commenter's opinion that the purpose of Letter A is to obtain Project Labor Agreements (PLAs) with the Project applicant, and that they use the CEQA process to further their purpose by holding up projects until the applicant concedes and agrees to a PLA.

This correspondence does not identify any significant new environmental issues or impacts that were not already addressed in the Draft EIR.

CHAPTER 3.0

ERRATA TO DRAFT EIR

3.1 INTRODUCTION

As provided in Section 15088(d) of the California Environmental Quality Act (CEQA) Guidelines, responses to comments may take the form of a revision to the text in the body of the Environmental Impact Report (EIR) or contained in marginal notes showing the information is revised in the response to comments. This section complies with the latter and provides changes to the Draft EIR presented in double underline (i.e., double underline) signifying text additions and strikethrough (i.e., ~~strikethrough~~) signifying text deletions. These notations are meant to provide clarification, corrections, or minor revisions as needed as a result of public comments, because of changes in the Project since the release of the Draft EIR, or correction of minor typographical errors found in the text from the Draft EIR as required by Section 15132 of the CEQA Guidelines. None of the corrections and additions constitutes significant new information or substantial project changes requiring recirculation as defined by Section 15088.5 of the CEQA Guidelines.

3.2 CHANGES TO THE DRAFT EIR

The changes to the Draft EIR are typographical errors found in several of the mitigation measures in Table ES-1 of the Executive Summary, several instances of inadvertent text found in the Cumulative Impact Analysis Section that did not accurately reflect the analysis correctly stated in Chapter 4.16 Transportation and Traffic, and changes to the Executive Summary and Traffic and Transportation Section to further clarify and improve upon **Mitigation Measures TRA-2, TRA-3, TRA-4, TRA-5, TRA-6, and TRA-8**. The changes (added text in double underline; deleted text with ~~strikethrough~~) are shown in the indented text, as follows.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Air Quality topic, pages ES-13 and 14:

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. ~~Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.~~

MM-AQ-10: For each increment of future development, construction plans shall include ~~Devise~~ 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:

- Create water-efficient landscapes within the development.
- Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
- Use reclaimed water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed 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.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Cultural Resources topic, pages ES-16, 17 and 18:

MM-CUL-1: If the Hawthorne House is moved to 8712 and 8720 Magnolia Avenue, it shall be subject to an administrative Certificate of Appropriateness~~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 Street 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.

If the Hawthorne House is moved to a site further than the 1,000 feet of the Magnolia Avenue/Monroe Street intersection, such relocation shall be reviewed by the Cultural Heritage Board ~~more distant and/or smaller property, it shall be subject to administrative Design Review~~. The following shall apply ~~wherever the Hawthorne House is relocated~~:

- A Certificate of Appropriateness shall be required.

-
- Commit to the exterior rehabilitation of the Hawthorne House including the landscaping of the property to be completed within one year after its relocation.
 - 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.
 - Relocate the Cultural Heritage Landmark plaque from its current location to the new location of the Hawthorne House.
 - Install a Cultural Heritage Landmark plaque at the location of the Hawthorne eucalyptus so that people can appreciate its historic association.

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

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 Certificate of Appropriateness ~~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 Historic Preservation Staff of the City Planning Division.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Cultural Resources topic, pages ES-20, 21 and 22:

MM-CUL-5: 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 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 Historic Preservation and Planning Staff Division.

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 Historic Preservation and Planning Staff Division.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Geology and Soils topic, pages ES-22 and 23:

MM-GEO-1: ~~To~~ 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-Director.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Greenhouse Gas Emissions topic, pages ES-24 and 25:

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 75: Design Guidelines), future development resulting from 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:

- 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.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Hazards and Hazardous Materials topic, pages ES-25 and 26:

MM-HAZ-1: 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.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Noise topic, pages ES-29, 30, 31 and 32:

MM-NOI-1: ~~During construction~~~~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 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.

This measure shall be implemented to the satisfaction of the City Planning, Building and Safety Divisions and Public Works Department.

MM-NOI-2: Prior to the issuance of ~~entitlements~~~~grading and/or building permits~~, 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.

MM-NOI-3: Prior to the issuance of ~~entitlements~~grading and/or building permits, 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 use compatibility standards. This measure shall be implemented to the satisfaction of the City Planning Division.

MM-NOI4: Prior to issuance of ~~building~~occupancy 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.

MM-NOI-5: Prior to the issuance of grading permits, development ~~proposed~~ within the CBUSP Specific Plan Zone that ~~will~~would be located within 200 feet of historic resources, as determined by a California Historical Resource Status Code, structures 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.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Transportation and Traffic topic, pages ES-34, 35 and 36:

MM-TRA-2: Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing ~~project, or before~~, 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 ~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM-TRA-3: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM-TRA-4: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM-TRA-5: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM-TRA-6: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

Draft EIR, Executive Summary, Table ES-1, Mitigation Measure(s) column, Transportation and Traffic topic, pages ES- 36 and 37:

MM-TRA-8: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

Draft EIR, Chapter 4.5 Cultural Resources, pages 4.5-55, 56 and 57:

MM-CUL-1: If the Hawthorne House is moved to 8712 and 8720 Magnolia Avenue, it shall be subject to an administrative Certificate of Appropriateness~~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.

If the Hawthorne House is moved to a site further than the 1,000 feet of the Magnolia Avenue/Monroe street intersection, such relocation shall be reviewed by the Cultural Heritage Board. The following shall apply:

- A Certificate of Appropriateness shall be required.
- Commit to the exterior rehabilitation of the Hawthorne House including the landscaping of the property to be completed within one year after its relocation.

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- 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.
 - Relocate the Cultural Heritage Landmark plaque from its current location to the new location of the Hawthorne House.
 - Install a Cultural Heritage Landmark plaque at the location of the Hawthorne eucalyptus so that people can appreciate its historic association.

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

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 Certificate of Appropriateness~~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 Historic Preservation Staff of the City Planning Division.

Draft EIR, Chapter 4.5 Cultural Resources, pages 4.5-58 and 59:

MM-CUL-5: 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 determined by the treatment plan, according to current professional repository standards.

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

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 Historic Preservation Staff of the City Planning Division.

Draft EIR, Chapter 4.7 Greenhouse Gases, pages 4.7-26 and 27:

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 75: 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.

Draft EIR, Chapter 4.12 Noise and Vibration, pages 4.12-34, 35 and 36:

MM-NOI-1: ~~During construction~~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 Planning, Building and Safety Divisions, and Public Works Department.

MM-NOI-2: Prior to the issuance of ~~entitlements 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 ~~entitlements 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 ~~building 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.

Draft EIR, Chapter 4.16 Traffic and Transportation, pages 4.16-32, 33 and 34:

MM-TRA-2: Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing ~~project, or before~~, 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 ~~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.

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- 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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM TRA-3: 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 ~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM TRA-4: 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 ~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM TRA-5: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

MM TRA-6: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

Draft EIR, Chapter 4.16 Traffic and Transportation, page 4.16- 34:

MM-TRA-8: 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~~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.

Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.

Draft EIR, Chapter 6.0 Cumulative Impact Analysis, page 6-24: The Cumulative Impact Analysis contains instances of inadvertent text that did not accurately reflect the analysis correctly stated in Chapter 4.16 Transportation and Traffic. The text has been clarified as follows:

Draft EIR Table 4.16.II (based on Table 15 from the TIA prepared for the Project) 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 ~~contributes to~~reduces the level of service deficiency at these roadway segments ~~from LOS C to LOS E~~. This is considered to be a significant cumulative impact and mitigation is required. For the segment of roadway on Adams Street between Briarwood Drive and Diana Avenue, Mitigation Measure 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. NOTE: THE TIA IS SILENT ON WHAT IS NEEDED TO FIX THIS IMPACT, AND DOES NOT PROVIDE A "MITIGATED" LEVEL OF SERVICE. IS IT THE ADAMS STREET IMPROVEMENTS DEFINED ON TIA PAGE 45? THESE ARE AS FOLLOWS:

~~Dedicate and construct the project's frontage improvements along Adams Street, to a 6 lane arterial with 120 feet of right-of-way, to include 3 travel lanes in the~~

~~southbound direction between Magnolia Avenue and the SR-91 Westbound Ramp.~~

Draft EIR, Chapter 6.0 Cumulative Impact Analysis, page 6-25: The Cumulative Impact Analysis contains instances of inadvertent text that did not accurately reflect the analysis correctly stated in Chapter 4.16 Transportation and Traffic. The text has been clarified as follows:

Draft EIR Table 4.16.KH (based on Table 16 from the TIA prepared for the Project) lists the queue lengths for each of the study area intersections in the Existing plus Ambient plus Cumulative plus Project condition.

As shown in Table 4.16.KH, ~~five intersection numerous~~ queue lengths exceed the existing storage length. This is considered to be a significant impact and mitigation is required. NOTE: THE TIA IS SILENT ON THE QUEUE LENGTH ANALYSIS. WHAT IS ITS PURPOSE? SHOULD IT BE IGNORED? These intersections include:

- 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.

The Project creates or contributes to the queue length exceedances at these intersections which is considered to be a significant cumulative 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 **Mitigation Measure TRA-5 (Adams Street/Garfield Street) and Mitigation Measure TRA-6 (Magnolia Avenue/Jefferson Street).** With implementation of these measures, queueing related impacts at these intersections would be **less than significant with mitigation incorporated.**

CHAPTER 4.0

MITIGATION MONITORING AND REPORTING PROGRAM

4.1 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.

4.2 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 4-1 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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TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
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).	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.
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).	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.
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.	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.
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.	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.
AQ-5:	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.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
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).	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
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.	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.
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: <ul style="list-style-type: none"> • 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; and • Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical 	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 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	equipment.			
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 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.
AQ-10:	<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"> • Create water-efficient landscapes within the development. • Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. • Use reclaimed water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed 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. 	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 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
BIO-1:	<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.
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	Prior to issuance of a tree removal permit.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Arborist Report submitted to City.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>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"> 1. The location, size, health, age, and number of onsite significant, heritage or specimen trees; and 2. Recommendation(s) for preservation, relocation and/or replacement. 			
CUL-1:	<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"> • 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 Street 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, 	Prior to issuance of building permit.	Community & Economic Development Department, Planning, Historic Preservation, and Building & Safety Divisions.	Approval of a Certificate of Appropriateness.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>including the uses of the property and the former windrow that included the Hawthorne eucalyptus tree.</p> <ul style="list-style-type: none"> Design the landscaping of the house to allow an unobstructed view to the house from Magnolia Avenue. <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"> A Certificate of Appropriateness shall be required. Commit to the exterior rehabilitation of the Hawthorne House including the landscaping of the property to be completed within one year after its relocation. 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. Relocate the Cultural Heritage Landmark plaque from its current location to the new location of the Hawthorne House. Install a Cultural Heritage Landmark plaque at the location of the Hawthorne 			

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>eucalyptus so that people can appreciate its historic association.</p> <p>This measure shall be implemented to the satisfaction of the Historic Preservation Staff of the City Planning Division.</p>			
CUL-2:	<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"> • 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 	Prior to issuance of building permit.	Community & Economic Development Department, Planning, Historic Preservation, and Building & Safety Divisions.	Approval of a Certificate of Appropriateness.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>existing building walls.</p> <p>This measure shall be implemented to the satisfaction of the Historic Preservation Staff of the City Planning Division.</p>			
CUL-3:	<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"> • 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) <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</p>	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>

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>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>			
CUL-4:	<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>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</p>	During grading and construction.	Community & Economic Development Department, Planning and Building & Safety Divisions; Project Applicant; Landowner; Qualified Archaeological Monitor.	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.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>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 documentation and implemented to the satisfaction of the City Planning Division.</p>			
CUL-5:	<p>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</p>	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 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>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 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>			

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
CUL-6:	<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 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.”</p> <p>This measure shall be implemented to the satisfaction of the City Historic Preservation and Planning Staff.</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>

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
GEO-1:	<p>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.</p>	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.	<p>Submittal of Geotechnical Study to City.</p> <p>Approval of grading permit or building permits as deemed applicable by City staff.</p>
GHG-1:	<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"> • Increase insulation such that heat transfer and thermal bridging is minimized; • Limit air leakage through the structure or within the heating and cooling 	Prior to issuance of building permits.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building permit.

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>distribution system to minimize energy consumption;</p> <ul style="list-style-type: none"> • 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. <p>This measure shall be implemented to the satisfaction of the City Building and Safety Division.</p>			
GHG-2:	<p>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 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"> • Create water-efficient landscapes within the development. • Install water-efficient irrigation systems and devices, such as soil moisture-based 	Prior to issuance of building permits.	Community & Economic Development Department, Planning and Building & Safety Divisions.	Approval of building permit.

TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>irrigation controls.</p> <ul style="list-style-type: none"> 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. <p>This measure shall be implemented to the satisfaction of the City Planning Division.</p>			
HAZ-1:	<p>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</p>	<p>Prior to issuance of building and/or demolition permits for the renovation, rehabilitation, or demolition of structures constructed prior to 1978.</p>	<p>Community & Economic Development Department, Planning and Building & Safety Divisions.</p>	<p>Approval of grading plans.</p> <p>Approval of demolition permit.</p> <p>Phase I Environmental Site Assessment submitted to City.</p>

4.0 – MITIGATION MONITORING AND REPORTING PROGRAM

**TABLE 4-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	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.			
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 & 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.
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	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.

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	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.			
NOI-1:	<p>During construction for any project within the CBU Specific Plan Zone, the project contractor shall implement the following best management practice measures during all construction activities:</p> <ul style="list-style-type: none"> • 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 construction.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department; Project Applicant; Construction Contractor.	Periodic inspection during construction.

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	<p>during all project construction.</p> <ul style="list-style-type: none"> • Avoid unnecessary idling by shutting off engines that are expected to idle for more than 5 minutes. • 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. <p>This measure shall be implemented to the satisfaction of the City Planning, Building and Safety Divisions, and Public Works Department.</p>			
NOI-2:	<p>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</p>	Prior to issuance of entitlements.	Community & Economic Development Department, Planning Division.	Acoustical Analysis submitted to City.

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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	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.			
NOI-3:	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 use compatibility standards. 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.
NOI-4:	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.
NOI-5:	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	Prior to issuance of grading permits.	Community & Economic Development Department, Planning and Historic Preservation Divisions.	Vibration Analysis submitted to City.

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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	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.			
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.	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.
TRA-2:	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: <ul style="list-style-type: none"> Adams Street southbound approach – restripe to include 2-300 foot left-turn lanes within the existing roadway. 	Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project. Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	Payment of fair share fees. Approval of certificate of occupancy.

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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<ul style="list-style-type: none"> 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. <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>			
TRA-3:	<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"> 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. 	<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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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<ul style="list-style-type: none"> 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. <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>			
TRA-4:	<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>

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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
TRA-5:	<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> <ul style="list-style-type: none"> Garfield Street northbound approach – restripe to include 1-115 foot left-turn lane within the existing roadway. <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>
TRA-6:	<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"> 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 	<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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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	lane within the existing roadway. Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.			
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.	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.
TRA-8:	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. <ul style="list-style-type: none"> 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 	Prior to issuance of the certificate of occupancy of Phase I of the South Campus Student Housing project. Prior to the issuance of the certificate of occupancy of Phase II of the South Campus Student Housing.	Community & Economic Development Department, Planning and Building & Safety Divisions; Public Works Department.	Payment of fair share fees. Approval of certificate of occupancy.

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Mitigation Measure No.	Mitigation Measure	Timing of Implementation	Responsible Party	Monitoring/Reporting Method
	<p>lane within the existing roadway.</p> <ul style="list-style-type: none">• 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. <p>Any subsequent revisions to the Specific Plan may require additional technical analysis, at which time may alter the required fair share percentage.</p>			

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