DRAFT ENVIRONMENTAL IMPACT REPORT

September 21, 2018

THIS PAGE INTENTIONALLY LEFT BLANK

DRAFT ENVIRONMENTAL IMPACT REPORT

SCH NO. 2016051004

CALIFORNIA BAPTIST UNIVERSITY SPECIFIC PLAN AMENDMENT PROJECT

City of Riverside

Community Development Department

3900 Main Street

Riverside, California 92522

LSA Project No. CTR1501

LSA

September 21, 2018

THIS PAGE INTENTIONALLY LEFT BLANK

TABLE OF CONTENTS

EXECUTIVE SUMMARY

CHAPTER 1.0 INTRODUCTION

CHAPTER 2.0 PROJECT DESCRIPTION

CHAPTER 3.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

CHAPTER 4.0 ENVIRONMENTAL IMPACT ANALYSIS

FIGURES AND TABLES

FIGURES

TABLES

THIS PAGE INTENTIONALLY LEFT BLANK

EXECUTIVE SUMMARY

This Draft Environmental Impact Report (Draft EIR) (State of California Clearinghouse No. 2016051004) for the California Baptist University Specific Plan (CBUSP) Amendment (proposed Project) has been prepared to accomplish the following: 1) identify the proposed Project impacts on the environment; 2) evaluate the various objectives and policies in the proposed Project that will mitigate potential environmental impacts (i.e., activities that will offset, minimize or otherwise avoid significant environmental impacts); and 3) discuss alternatives to the proposed Project. Included in this summary are areas of known controversy and issues to be resolved, a summary of project alternatives, a summary of all project impacts and associated mitigation measures, and a statement of the ultimate level of significance after mitigation is applied.

ES.1 DOCUMENT PURPOSE

This Draft EIR has been prepared by the City of Riverside (City) as "Lead Agency" to inform decision makers and the public of the potential significant environmental effects associated with the proposed Project. This Draft EIR has been prepared in accordance with the Guidelines for the implementation of the California Environmental Quality Act (State CEQA Guidelines), (Sections 15000-15387 of the California Code of Regulations), and the City's CEQA Guidelines.

This Draft EIR has been prepared to evaluate comprehensively the potential impacts that would result from implementation of the proposed Project. The Draft EIR addresses the short-term and long-term effects of the project on the environment, and evaluates the potential for the Project to cause direct and indirect growth-inducing impacts as well as cumulative impacts. As appropriate, mitigation has been identified for those impacts determined to be significant. The Draft EIR also analyzes alternatives to the proposed Project that would substantially reduce or avoid potentially significant impacts associated with the proposed Project. Based on the potential impacts of the proposed Project, including cumulative impacts, the City determined that an EIR should be prepared to analyze the potential impacts of the Project with respect to the following issues:

- Aesthetics;
- Agricultural and Forest Resources;
- Air Quality;
- Biological Resources;
- Cultural Resources;
- Geology and Soils;
- Greenhouse Gas Emissions;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality;
- Mineral Resources;
- Noise;
- Population and Housing;
- Public Services;
- Recreation;
- Traffic;
- Tribal Cultural Resources;
- Utility Systems; and
- Energy Conservation

- Land Use and Planning;

ES.2 PROJECT LOCATION

The proposed Project is located generally at 8432 Magnolia Avenue in Riverside, California. The location of the proposed Project is illustrated in Figure 1-1, Regional and Project Location, and Figure 1-2, Aerial View of the Project Area. The Project site consists of an approximately 167-acre CBU Specific Plan Zone consisting of two subareas, CBUSP-1 and CBUSP-2 (Figure 1-3). CBUSP-1 covers the approximately 147.25-acre campus core. CBUSP-2 covers approximately 19.75 acres of off-site properties on Magnolia Avenue, Monroe Street, and Adams Street. CBUSP-1 includes all CBU properties generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street. CBUSP-2 includes six properties administered by CBU outside of the CBUSP-1 planning area (i.e., the campus core), albeit immediately adjacent to or within one block of the campus core (Figure 1-3).

The uses adjacent to the proposed Project site are a mixture of single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; and single-family and multi-family residential, commercial and school uses to the west. State Route 91 (SR-91) is located to the south. General commercial uses are located further south beyond SR-91, including car dealerships. Project location is further discussed in Chapter 2.0, Project Description, of this EIR.

ES.3 PROJECT DESCRIPTION

ES.3.1 Background

In 1950, the Los Angeles Southern Baptist Association opened the doors of California Baptist College in the City of El Monte. In 1955, the college relocated to Riverside and became accredited by 1961. In 1998, the college officially became California Baptist University (CBU) and has undergone extensive growth annually since that time. Today, CBU is one of the top private Christian liberal arts colleges and universities in Southern California offering bachelor's, master's, and credential programs in their Riverside and San Bernardino campuses and online. The campus core contains Spanish-style buildings accommodating classrooms, campus housing, a library, offices, and maintenance and athletic facilities. In the midst of dynamic growth, CBU continues the tradition of education in a Christian environment.

Development administered by CBU is subject to the CBU Specific Plan (CBUSP), adopted March 26, 2013 under Resolution No. 22511 and Ordinance No. 7203.[1] The CBUSP implements goals and policies contained in the City's General Plan by defining land use controls and development standards tailored to CBU. The CBUSP ensures that development within the CBU planning area is conducted in a coordinated manner, with adequate consideration given to land uses, infrastructure, cultural and natural resources, public services, and public safety. Since adoption of the CBUSP in 2013, the CBU campus has continued to grow both in area and student population. A comprehensive CBUSP Amendment (proposed Project) is proposed by CBU to accommodate a projected increase in student enrollment from 8,414 total students in 2015 to 12,000 total students by 2025 under a more urban-intensity type of development. The University's student population consists of three student categories: traditional students, graduate students, and online students, and the growth in student population is due to the expansion of the curriculum offered.

To accommodate growth in student population, in 2016 CBU provided 815,114 square feet of building area for academic and recreation purposes, and the University anticipates providing an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structures with incidental office space by 2025. Additionally, new and reconfigured educational, housing, administrative support, athletic, and other facilities will be required within the CBU Specific Plan Zone.

The proposed CBUSP Amendment will be analyzed in this Draft EIR as a comprehensive policy and regulatory guidance document for the private use and development of all properties within the 167-acre CBU Specific Plan Zone, including the 147.25-acre campus core (CBUSP-1) and approximately 19.75 acres of off-site properties on Magnolia Avenue and Adams Street (CBUSP-2). Development within the proposed CBU Specific Plan Zone will be subject to specific greenway buffers, setbacks, building heights, massing, and design requirements. Although both CBUSP-1 and CBUSP-2 subareas permit the same land uses, each has distinct height and density standards, as set forth in Chapter 4 (Development Standards) of the CBUSP Amendment. Any future development within the CBU Specific Plan Zone will be subject to the CBUSP Amendment in accordance with this Draft EIR.

ES.3.2 Project Objectives

Project objectives allow for the analysis of reasonable alternatives to the proposed Project. Reasonable alternatives must be analyzed in accordance with Section 15126.6 of the CEQA Guidelines.

[1] *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. City of Riverside. Adopted March 26, 2013.

The overall Project goal is to accommodate a projected increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. The Project objectives and policies as stated in the Specific Plan are as follows:

- Objective 1: Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.
    - *Policy 1.1*: Pursue the development program and campus improvements described in this Specific Plan while maintaining the flexibility needed to accommodate evolving academic and student needs and dynamic growth.

- Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.
    - *Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined herein.*
    - *Policy 2.2: Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus.*
    - *Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.*

- Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.
    - *Policy 3.1: Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum.*
    - *Policy 3.2: Provide a variety of safe and secure housing opportunities for students, including through the conversion of existing apartment units to student housing.*
    - *Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.*
    - *Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.*

- *Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.*

- Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.
  - *Policy 4.1: Ensure consistency with City of Riverside street standards, as may be modified, regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus.*
  - *Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus.*
  - *Policy 4.3: Accommodate the University's parking demand in a manner that minimizes external impacts, as required by this Specific Plan.*
  - *Policy 4.4: Pursue the vacation of Diana Avenue to provide reasonable control over the access and vehicle speed along this southern campus edge.*

- Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission.
  - *Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 6.1.*
  - *Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in this Specific Plan.*
  - *Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in this Specific Plan.*
  - *Policy 5.4: Establish a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.*

- Objective 6: Encourage environmentally sustainable development and operational practices.
  - *Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long□term operating expenses consistent with City of Riverside building code requirements.*

- *Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals.*
- *Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements.*
- *Policy 6.4: Implement sustainability measures that complement and support the City of Riverside Green Action Plan.*

- Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.
  - *Policy 7.1: Provide opportunities for University/City partnerships for programming of events on campus.*
  - *Policy 7.2: Maintain an open-door policy for the community to experience cultural events, competitive sports, conferencing, and other events on campus.*

- Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research.
  - *Policy 8.1: Strive towards seamless access to information, resources, and services by creating and maintaining a vanguard converged network infrastructure supporting voice, video, and data.*
  - *Policy 8.2: Enhance student and faculty access by providing campus-wide wireless coverage.*
  - *Policy 8.3: Enrich student experience by leveraging technologies to improve operational efficiencies.*
  - *Policy 8.4: Stay abreast of emerging technologies by participating and partnering with relevant organizations in this ever-changing landscape.*

ES.3.3 Required Permits and/or Approval

Implementation of the proposed Project may require permits or other forms of approval from the City and other public agencies or entities prior to construction of the proposed Project. They include, but are not limited to, the following.

City of Riverside

The proposed Project requires amendments to several land use planning documents. First, the proposed Project includes a General Plan Amendment (P15-0989) to change the underlying General Plan land use designation for the Health Sciences Campus and Wellness Center from

"Public Facilities/Institutional" to "CBU Specific Plan" (see Figure 2-2). Second, the proposed Project includes a Rezone request (P15-0987) to rezone the two properties above from R-1-7000 to "CBU Specific Plan Zone" (see Figure 2-3). Third, the proposed Project includes two Specific Plan Amendments (P17-0543) to remove the same two properties from the *Magnolia Avenue Specific Plan* and add them to the CBUSP. Lastly, the proposed Project requires certification of the EIR (P15-0990

Certificate of Appropriateness

Any reconstruction or reuse of historic buildings or structures defined as Historical Resources pursuant to CEQA (§15064.5) or that are designated or eligible for designation in accordance with the criteria set forth in the City's Cultural Resources Code (Title 20 of the Riverside Municipal Code) will require a Certificate of Appropriateness. The Certificate of Appropriateness is intended to ensure that the historic integrity of these properties is maintained whenever exterior improvements are made. As part of the process, impacts to Historical Resources are addressed in accordance with CEQA requirements.

Magnolia Avenue Specific Plan Amendment

The proposed Project includes a Specific Plan Amendment (P17-0543) to remove the Health Sciences Campus and Wellness Center properties from the *Magnolia Avenue Specific Plan* and add it into the CBUSP. For the CBU Specific Plan Zone, the CBU Specific Plan Amendment Design Guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the Design Guidelines of the *Magnolia Avenue Specific Plan*.

California Baptist University Specific Plan Amendment

The CBUSP Amendment is proposed in accordance with Section 65450 et seq. of the California Government Code and shall be implemented by resolution pursuant to all applicable provisions of the Riverside Municipal Code (RMC), including Chapter 19.820 (*Specific Plan/Specific Plan Amendments*) of the RMC, requiring an application and fee submitted to the City Planning Division stating in detail the reason for the proposed amendment.

In addition, the CBUSP Amendment is subject to approval by the Approving Authority, per the Zoning Code, Chapter 19.650 Approving and Appeal Authority. The provisions of the CBUSP Amendment replace RMC Title 19 (*Zoning Code)* regarding the use, development, and entitlement of properties. Where the Specific Plan is silent with regard to any land use regulations, the provisions of RMC Title 19 (*Zoning Code)* shall apply. However, the standards and guidelines identified in the CUBSP shall take precedence over the general standards and guidelines contained in the Zoning Code.

Regional Water Quality Control Board, Santa Ana Region

National Pollutant Discharge Elimination System Compliance

A National Pollutant Discharge Elimination System (NPDES) Construction General Permit is required for grading activities of one acre or larger. Any development within the CBU Specific Plan Zone resulting in a disturbance of more than one acre of soil will require filing of a Notice of Intent with the Regional Water Quality Control Board, Santa Ana Region and acquisition of a General Construction Activity Stormwater Permit pursuant to the NPDES regulations established under the Clean Water Act. This permit requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which is intended to prevent degradation of surface and ground waters during the grading and the demolition process.

Riverside Municipal Airport Land Use Compatibility Plan

Land Use Compatibility Plan Consistency

The Riverside County Airport Land Use Commission (RCALUC) has developed Land Use Compatibility Plans for each airport in the County of Riverside, including the Riverside Municipal Airport, which is located approximately two miles north of the CBU Specific Plan Zone. Portions of the CBU Specific Plan Zone lie within Zone D (Primary Traffic Patterns and Runway Buffer Area) and Zone E (Other Airport Environs) of the Land Use Compatibility Plan prepared for Riverside Municipal Airport,[2] as shown on Figure 4.8-1. In Zone D, any development over 70 feet tall will be subject to airspace review by the Riverside County Airport Land Use Commission, and highly noise-sensitive outdoor nonresidential uses are prohibited. Additionally, children's schools, hospitals, and nursing homes are discouraged within Zone D. In Zone E, any development over 100 feet tall will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.[3]

Tribal Consultation

In compliance with California law chaptered pursuant to SB 18 (Chapter 905, Statutes of 2004) and AB 52 (Chapter 532, Statues of 2014), the City of Riverside has consulted with California Native American tribes during the planning and environmental review processes.

[2] *Riverside County Airport Land Use Compatibility Plan*. Adopted by Riverside County Airport Land Use Commission. October 14, 2004.

[3] *Ibid.* Table 2A.

ES.4 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Table ES-1, Summary of Environmental Impacts and Mitigation Measures, provides a summary of the impact analysis related to the proposed Project. The table identifies a summary of the significant environmental impacts resulting from the Project pursuant to the CEQA Guidelines Section 15123(b)(1). For more detailed discussion, please see Chapter 4.0 of this document. Table ES-1 also lists the applicable mitigation measures related to identified significant impacts, as well as the level of significance after mitigation is identified.

THIS PAGE INTENTIONALLY LEFT BLANK

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Aesthetics			
A: Scenic Vistas	Less than significant	N/A	N/A
B: Scenic Highways	Less than significant	N/A	N/A
C: Visual Character	Less than significant	N/A	N/A
D: Light and Glare	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Agricultural and Forestry Resources			
A: Conversion of Prime, Unique, or Statewide Important Farmland to Non-Agricultural Use	No Impact	N/A	N/A
B: Conflict with Agricultural Zoning or Williamson Act	No Impact	N/A	N/A
C: Conflict with Existing Forest Land Zoning or Cause Rezoning of Forest Land	No Impact	N/A	N/A
D: Conversion of Forest Land to Non-Forest Use	No Impact	N/A	N/A
E: Other Changes that would Convert Farmland or Forest Land	No Impact	N/A	N/A
Cumulative	No Impact	N/A	N/A
Air Quality			
A: Conflict with or Obstruct an Air Quality Plan	Less than significant	N/A	N/A
B: Violate an Air Quality Standard	Potentially significant		Less than

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-AQ-1: All project construction plans shall include a specification requiring the application of nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). **MM-AQ-2:** All project construction plans shall include a specification requiring the watering of active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving). **MM-AQ-3:** All project construction plans shall include a specification requiring the covering of all haul trucks transporting dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. **MM-AQ-4:** All project construction plans shall include a specification requiring the paving of construction access roads at least 30 meters (100 feet) onto the site from the main road. **MM-AQ-5:** All project construction plans shall include a specification limiting traffic speeds on all unpaved roads to 15 miles per hour or less. **MM-AQ-6:** All project construction plans shall include a specification requiring the recycling or reuse of at least 50 percent of the construction material (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard).	significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-AQ-7: All project construction plans shall include a specification requiring the use of "green building materials" such as those materials that are rapidly renewable or resource-efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project, as specified on the CalRecycle website. **MM-AQ-8:** Design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following: o Increase insulation such that heat transfer and thermal bridging is minimized; o Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; and o Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment. **MM-AQ-9:** Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings. **MM-AQ-10:** 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: o Create water-efficient landscapes within the	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		development. o Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. o Use reclaimed water, if available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water, if available. o Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals. o Restrict watering methods (e.g., prohibit systems that apply water to nonvegetated surfaces) and control runoff.	
C: Result in Cumulatively Considerable Net Increase in any Criteria Pollutant	Less than significant	N/A	N/A
D: Expose Sensitive Receptors to Substantial Pollutant Concentrations	Less than significant	N/A	N/A
E: Create Objectionable Odors	Less than significant	N/A	N/A
Cumulative	Potentially significant	Implement **AQ-1** through **AQ-10**.	N/A
Biological Resources			
A: Candidate, Non-listed Sensitive, or Special-Status Species	Potentially significant	**MM-BIO-1:** Initial ground-disturbing activities (e.g., demolition, grading) should be conducted outside the bird nesting season (February 15 through August 31). If project activities are planned during the bird nesting season, nesting bird surveys should be conducted within 30 days	Less than significant.

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		prior to disturbance to ensure birds protected under the MBTA are not disturbed by demolition-related activities such as noise and increased human presence. 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.	
B: Riparian Habitat or Other Sensitive Natural Communities	Less than significant	N/A	N/A
C: Jurisdictional Waters/Wetlands	Less than significant	N/A	N/A
D: Wildlife Movement and Migratory Species	Less than significant	N/A	N/A
E: Adopted Policies and/or Ordinances	Potentially significant	**MM-BIO-2:** Prior to the issuance of a tree removal permit for any future development within the open field areas along Magnolia Avenue that would require removal of heritage trees, the applicant shall submit to the City for review and approval, a report prepared by a certified arborist that identifies on-site heritage, significant and/or specimen trees. The arborist report shall contain the information	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		required under Chapter 28, Title III of the City's Municipal Code, including (but not limited to) the following: o The location, size, health, age, and number of onsite significant, heritage or specimen trees; and o Recommendation(s) for preservation, relocation and/or replacement.	
F: Adopted habitat Conservation Plans	Less than significant	N/A	N/A
Cumulative	Potentially significant	Implement **BIO-1** and **BIO-2**.	Less than significant
Cultural Resources			
A: Adverse change in the significance of a historical resource	Potentially significant	**MM-CUL-1:** If the Hawthorne House is moved to 8712 and 8720 Magnolia Avenue, it shall be subject to an administrative Design Review process and the following: • Orient the main entrance to the Hawthorne House toward Magnolia Avenue, as was originally. • 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 more distant and/or	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		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 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	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		the recess. • Sliding Patio Doors: Any replacement of eight-foot-wide patio doors shall occur with clear anodized storefront creating a vertically-divided opening framed in clear anodized aluminum. The lower glass of the storefront shall be given a frosted opaque finish as visible from the exterior. On the interior, this lower area shall be mated to an interior wall finished in drywall to match the balance of the interior walls. The balance of the eight-foot-wide openings shall be given a stucco finish to match the balance of the existing building walls. This measure shall be implemented to the satisfaction of the City Planning Division.	
B: Adverse change in significance of an archaeological resource	Potentially significant	**MM-CUL-3:** Prior to the issuance of grading permits, the applicant shall submit to the City for review and approval, evidence that qualified professional archeologist(s) has been retained to monitor ground-disturbing activities of native soil (e.g., vegetation removal, grading, excavation, removal of foundations, and/or trenching) occurring within 50 feet of the following CBU Facilities: o Lancer Outdoor Athletic Complex o Physical Plant/Shops (Facilities & Planning Services Maintenance and Operations) o Lancer Arms o Former Riverside Lower Canal o Former San Carlos Apartments (The Point) The duration and frequency of monitoring shall be determined	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		by the City in coordination with the archeologist(s). Factors determining the duration and frequency of monitoring shall include (but not be limited to) the rate of excavation and grading activities, the materials being excavated (fill or native soils), the depth of excavation, the location of excavation, and if found, the abundance and type of archaeological resources encountered. As determined appropriate by the City in coordination with the archaeologist(s), monitoring may be reduced or discontinued in areas where the archaeologist(s) determines on-site activities will not disturb archaeological resources. This mitigation measure, including the contact information of the project archaeologist, shall be incorporated in all construction contract documentation and be implemented to the satisfaction of the City Planning Division. **MM-CUL-4:** If archaeological resources are encountered during ground-disturbing activities, the archaeologist(s) shall be empowered to temporarily divert or redirect ground-disturbing activities in the vicinity in order to make an evaluation of the find. The archaeological monitor(s) shall notify the City, applicant, and appropriate Native American tribes should any such discovery be made during the course of ground-disturbing activities. The archaeologist(s) shall recommend appropriate treatment measures (i.e., avoidance, removal, or preservation in place) to reduce or avoid impacts to buried resources, and determine appropriate treatment, which may include preservation in place or the development and implementation of a testing/data	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		recovery investigation treatment plan. Should the archaeologist(s) determine through consultation with the Native American tribes that the discovery is a resource pursuant to Section 15064.5, avoidance or other mitigation will be required pursuant to and consistent with CEQA Guidelines Sections 15064.5 and 15126.4 and Public Resources Code Section 21083.2. A final report detailing the significance and treatment of discovered archaeological resources shall be prepared by the archaeologist and submitted to the City and the Eastern Information Center at University of California, Riverside. All cultural material, excluding sacred, ceremonial, grave goods, and human remains, collected during the grading monitoring program and from any previous archaeological studies or excavations on the project site shall be curated, as determined by the treatment plan, according to current professional repository standards. This mitigation measure, including the contact information of the archaeologist, shall be incorporated in all construction contract documentation and implemented to the satisfaction of the City Planning Division. **MM-CUL-5:** If 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).	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		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 Planning Division.	
C: Destroy a unique paleontological resource or site or unique geologic feature	Potentially significant	**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	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		salvage fossil resources that may be unearthed during construction. The paleontologist shall temporarily halt or divert construction equipment to allow recording and removal of the unearthed resources. Any fossils found shall be offered for curation at a curation facility approved by the City. A report of findings, including, when appropriate, an itemized inventory of recovered specimens and a discussion of their significance, shall be prepared upon completion of the steps outlined above. The report and inventory, when submitted to and approved by the appropriate lead agency, will signify completion of the program to mitigate impacts on paleontological resources." This measure shall be implemented to the satisfaction of the City Planning Division.	
D: Disturb human remains	Less than significant	N/A	N/A
Cumulative cultural resource impact	Potentially significant	Implement **CUL-1** through **CUL-6**.	Less than significant
Geology and Soils			
A: Fault Rupture	Less than significant	N/A	N/A
B: Ground Shaking	Less than significant	N/A	N/A
C: Seismic-Related Ground Failure	Potentially significant	**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, manufactured slope stability (if	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		applicable), and the engineering and construction of occupied or inhabited structures. The findings and recommendations contained in these reports shall be implemented. 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 Director.	
D: Landslides and Rockfalls	Less than significant	N/A	N/A
E: Soil Erosion or Loss of Topsoil	Less than significant	N/A	N/A
F: Unstable Soils	Potentially significant	Implement **GEO-1**	Less than significant
G: Expansive Soils	Potentially significant	Implement **GEO-1**	Less than significant
H: Septic Tanks	No impact	N/A	N/A
Cumulative	Potentially significant	Implement **GEO-1**	Less than significant
Greenhouse Gas Emissions			
A: Generate direct or indirect greenhouse gas emissions	Less than significant	N/A	N/A
B: Conflict with a plan, policy, or regulation adopted to reduce greenhouse gas emissions	Potentially significant	**MM-GHG-1:** To ensure consistency with the City's RRG-CAP, the project shall design all project buildings to meet or exceed the California Building Code's (CBC) Title 24 energy standard, including, but not limited to, any combination of the following: o Increase insulation such that heat transfer and thermal bridging is minimized;	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		o Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption; o Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment; and o Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings. This measure shall be implemented to the satisfaction of the City Building and Safety Division. **MM-GHG-2:** To ensure consistency with the City's RRG-CAP and to implement the Water Conservation Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: 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: o Create water-efficient landscapes within the development. o Install water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls. o Use reclaimed water or non-potable well water, if	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		available, for landscape irrigation within the project. Install the infrastructure to deliver and use reclaimed water or non-potable well water, if available. o Design buildings to be water-efficient. Install water-efficient fixtures and appliances, including low-flow faucets and waterless urinals. o 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.	
Cumulative	Potentially significant	Implement **GHG-1** and **GHG-2**	Less than significant
Hazards and Hazardous Materials			
A: Routine Transport, use, or Disposal of Hazardous Materials	Less than significant	N/A	N/A
B: Reasonably Foreseeable Upset and Accident Conditions	Potentially significant	**MM-HAZ-1:** Prior to issuance of a grading permit or prior to renovation, rehabilitation, or demolition of existing CBU structures, 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	N/A

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		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. **MM-HAZ-2:** Prior to renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, a lead-based paint, asbestos, and organochlorine pesticide (from termite applications) survey shall be conducted. Should lead-based paint, asbestos-containing materials, and/or organochlorine pesticides be identified during survey, abatement of these materials will be accomplished in accordance with local, State, and federal guidelines. This measure shall be implemented to the satisfaction of the City Community & Economic Development Director.	
C: Emit Hazards Near Existing or Proposed School	Potentially significant	Implement **HAZ-2**	Less than significant
D: Located on a Listed Hazardous Materials Site	Potentially significant	Implement **HAZ-1** and **HAZ-2**	Less than significant
E: Within an Airport Land Use Plan or Within Two Miles of a Public Airport	Potentially significant	**MM-HAZ-3:** Prior to issuance of building permits for any new structure or remodeling that would increase the height of any existing structure, CBU (or its successor-in-interest, if applicable) shall submit documentation verifying that the structure's elevation above mean sea level (at top point, including all roof-mounted equipment and lighting, if applicable): (1) will not exceed the elevation of Runway 16-32 at its southerly terminus (747.5 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway; and, (2) will not exceed the elevation of Runway 9-27 at its easterly terminus (815	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway. If both of these requirements cannot be met for any given structure, the applicant shall file Form 7460-1 with the Federal Aviation Administration, and no building permit shall be issued until a "Determination of No Hazard to Air Navigation" is received from the Federal Aviation Administration and filed with the City of Riverside Planning Department, the City of Riverside Building and Safety Department, the Riverside County Airport Land Use Commission, and manager of Riverside Municipal Airport.	
F: Within Vicinity of a Private Airport	No impact	N/A	N/A
G: Conflict with Emergency Response Plans	Less than significant	N/A	N/A
H: Wildland Fire Risks	No impact	N/A	N/A
Cumulative	Potentially significant	Implement **HAZ-1**, **HAZ-2** and **HAZ-3**	Less than significant
Hydrology and Water Quality			
A: Violate any water quality standards or waste discharge requirements	Less than significant	N/A	N/A
B: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge	Less than significant	N/A	N/A
C: Alter Drainage Resulting in Erosion or Siltation Offsite	Less than significant	N/A	N/A
D: Alter Drainage or Increase of Surface	Less than significant	N/A	N/A

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Runoff Resulting in Flooding On- or Off-site			
E: Runoff Exceeding Capacity of Existing or Planned Facilities	Less than significant	N/A	N/A
F: Otherwise Degrade Water Quality	Less than significant	N/A	N/A
G: Place Housing in Flood Hazard Areas	No impact	N/A	N/A
H: Place Structures that Impede or Redirect Flood Flows	No impact	N/A	N/A
I: Dam Inundation Impacts	Less than significant	N/A	N/A
J: Inundation by Seiche, Tsunami, or Mudflow	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Land Use and Planning			
A: Physically divide an established community	Less than significant	N/A	N/A
B: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.	Less than significant	N/A	N/A
C: Conflict with any applicable habitat conservation plan or natural community	Less than significant	N/A	N/A

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
conservation plan			
Cumulative	Less than significant	N/A	N/A
Mineral Resources			
A: Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state	No impact	N/A	N/A
B: Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan	No impact	N/A	N/A
Cumulative	No impact	N/A	N/A
Noise			
A: Noise in excess of established standards	Potentially significant	**MM-NOI-1**: Prior to issuance of grading permits for any project within the CBU Specific Plan Zone, the project contractor shall implement the following best management practice measures during all construction activities: o Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards. o Place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the active project site. o 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	Less than significant

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		during all project construction. o Avoid unnecessary idling by shutting off engines that are expected to idle for more than 5 minutes. o 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 Division. **MM-NOI-2:** Prior to the issuance of 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	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		Division. **MM-NOI-3:** Prior to the issuance of 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-NOI-4:** Prior to issuance of 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.	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
B: Excessive groundborne vibration or groundborne noise levels	Less than significant	**MM-NOI-5:** Prior to the issuance of grading permits, development proposed within the CBUSP Zone that would be located within 200 feet of historic 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 Division.	N/A
C: Permanent increase in ambient noise levels	Potentially significant	Implement **NOI-1**, **NOI-2**, **NOI-3**, **NOI-4**	Less than significant
D: Temporary or periodic increase in ambient noise levels	Potentially significant	Implement **NOI-1**, **NOI-2**, **NOI-3**, **NOI-4**	Less than significant
E: Exposure to Excessive Noise from Public Airport	Less than significant	N/A	N/A
F: Exposure to Excessive Noise from Private Airport	No impact	N/A	N/A
Cumulative	Potentially significant	Implement **NOI-1**, **NOI-2**, **NOI-3**, **NOI-4**, **NOI-5**	Less than significant
Population and Housing			
A: Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)	Less than significant	N/A	N/A

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
B: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere	Less than significant	N/A	N/A
C: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Public Services			
A: Police Protection Facilities	Less than significant	N/A	N/A
B: Fire Protection Facilities	Less than significant	N/A	N/A
C: School Facilities	No impact	N/A	N/A
D: Library Facilities	Less than significant	N/A	N/A
E: Other Facilities	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Recreation			
A: Existing Recreational and Park Facilities	Less than significant	N/A	N/A
B: New or Physically Altered Recreation and Park Facilities	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Transportation and Traffic			
A: Conflict with applicable traffic	Potentially significant	**MM-TRA-1:** Prior to the issuance of the first building permit,	Significant and

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
performance standard		CBU shall construct Lancer Lane at Adams Street to include 2 inbound lanes and 3 outbound lanes having turning movements as approved by the City Traffic Engineer (1 left-turn lane, 1 through lane, 1 right-turn lane). The NB approach on Adams Street will be widened to include a second left turn lane, and provide 250 feet of storage for the left-turn lanes. The SB approach on Adams Avenue will be widened to include an additional thru lane. This internal roadway will continue to connect to Magnolia Avenue, and will serve as the primary internal roadway to the campus. **MM-TRA-2:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 13.65%, for the following improvements to the Adams Street/Magnolia Avenue intersection: o *Adams Street southbound approach – restripe to include 2-300 foot left-turn lanes within the existing roadway.* o *Adams Street northbound approach – restripe to include 2-240 foot left-turn lanes within the existing roadway.* o *Magnolia Avenue eastbound approach – modify the existing raised median to provide 265 feet of storage.* o *Magnolia Avenue westbound approach – modify the existing raised median to provide 365 feet of storage.*	unavoidable

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		MM-TRA-3: Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 18.49%, for the following improvements to the Monroe Street/Magnolia Avenue intersection: o *Monroe Street northbound approach – restripe to include 1-410 foot left-turn lane within the existing roadway.* o *Monroe Street southbound approach – restripe to include 1-215 foot left-turn lane within the existing roadway.* o *Magnolia Avenue eastbound approach – modify the existing raised median to provide 240 feet of storage.* o *Magnolia Avenue westbound approach – modify the existing raised median to provide 430 feet of storage.* **MM- TRA-4:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 43%, to construct an exclusive eastbound right-turn lane with a minimum storage length of 100 feet on Magnolia Avenue at Adams Street and modifications to the signal phasing to include a right-turn overlap with the northbound left-turn phase. **MM-TRA-5:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share,	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		calculated to be 14.50%, for the following improvements to the Adams Street/Garfield Avenue intersection: o *Garfield Street northbound approach – restripe to include 1-115 foot left-turn lane within the existing roadway.* **MM-TRA-6:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be 11.01%, for the following improvements to the Magnolia Avenue/Jefferson Street intersection: o *Jefferson Street northbound approach – restripe to include 1-175 foot left-turn lane within the existing roadway.* o *Jefferson Street southbound approach – restripe to include 1-200 foot left-turn lane within the existing roadway.* **MM-TRA-7:** Prior to the issuance of the certificate of occupancy of the East Parking Structure, installation of curb and gutter at 53 feet from monument centerline, sidewalk and matching paving on Adams Street from Lancer Lane/Briarwood Drive to the westbound 91 freeway on-ramp is required. The City has determined that the required improvements shall terminate at the Diana Avenue monument centerline along the Shell Gas Station's Adams Street frontage. **MM-TRA-8:** Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be	

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
		6.67%, for the following improvements to the Magnolia Avenue/Monroe Street intersection o *Monroe Street northbound approach – restripe to include 1-410 foot left-turn lane within the existing roadway.* o *Monroe Street southbound approach – restripe to include 1-215 foot left-turn lane within the existing roadway.* o *Magnolia Avenue eastbound approach – modify the existing raised median to provide 240 feet of storage.* o *Magnolia Avenue westbound approach – modify the existing raised median to provide 430 feet of storage.*	
B: Conflict with applicable congestion management program	Potentially significant	Implement **TRA-1**through **TRA-8**	Significant and unavoidable
C: Air Traffic Patterns	Less than significant	N/A	N/A
D: Design Features or incompatible Uses	Less than significant	N/A	N/A
E: Inadequate Emergency Access	Less than significant	N/A	N/A
F: Public Transit, Bicycle, or Pedestrian Facilities	Less than significant	N/A	N/A
Cumulative	Potentially significant	Implement **TRA-1** though **TRA-8**	Significant and unavoidable

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Tribal Cultural Resources			
A: Listed or Eligible Tribal Cultural Resources	Potentially significant	Implement **CUL-1** through **CUL-6**	Less than significant
B: Lead Agency Defined Tribal Cultural Resources	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Utilities and Service Systems			
A: Wastewater Treatment Requirements	Less than significant	N/A	N/A
B: Require Construction of Additional Water and/or Wastewater Treatment Facilities	Less than significant	N/A	N/A
C: Require Construction of Additional Storm Water Drainage Facilities	Less than significant	N/A	N/A
D: Sufficient Water Supplies	Less than significant	N/A	N/A
E: Wastewater Treatment Capacity	Less than significant	N/A	N/A
F: Sufficient Landfill Capacity	Less than significant	N/A	N/A
G: Solid Waste Regulations	Less than significant	N/A	N/A
Cumulative	Less than significant	N/A	N/A
Energy Conservation			
A: Result in Wasteful, Inefficient, or Unnecessary Consumption of Energy; Conflict with Existing Energy Standards and Regulations; or Place a Significant Demand on Local and Regional Energy	Less than significant	N/A	N/A

Table ES-1
Summary of Environmental Impacts and Mitigation Measures

Environmental Topic	Impact Before Mitigation	Mitigation Measure(s)	Level of Significance After Mitigation
Supplies or Require a Substantial Amount of Additional Capacity			
Cumulative	Less than significant	N/A	N/A

N/A = not applicable

THIS PAGE INTENTIONALLY LEFT BLANK

ES.5 AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Section 15123(b) (2) of the CEQA Guidelines requires that areas of controversy known to the lead agency must be stated in the EIR summary. Issues of interest to the public and public agencies were identified during the 30-day public comment period of the NOP. Written comments in response to the NOP were received from the following agencies:

- State of California Governor's Office of Planning and Research – State Clearinghouse
- South Coast Air Quality Management District
- California Department of Transportation
- Metropolitan Water District of Southern California
- Department of Toxic Substances Control
- Native American Heritage Commission

The NOP, distribution list, and comment letters received during the NOP review period are included in Appendix A of this Draft EIR.

Section 15123(b)(3) of the CEQA Guidelines requires that an EIR identify issues to be resolved; this includes the choice among alternatives and whether or how to mitigate significant impacts. The major issues to be resolved for the proposed Project include decisions by the City as to whether this Draft EIR adequately describes the potential environmental impacts of the proposed Project, whether the recommended mitigation measures should be adopted or modified, whether additional mitigation measures need to be applied, whether the proposed Project should or should not be approved as proposed, and/or whether the proposed Project should be modified based on the alternatives considered in this Draft EIR.

ES.6 SUMMARY OF PROJECT ALTERNATIVES

Section 15126.6 of the CEQA Guidelines identifies the parameters within which consideration and discussion of alternatives to the proposed Project should occur. As stated in this section of the guidelines, alternatives must focus on those that are reasonably feasible and that attain most of the basic objectives of the proposed Project. Each alternative should be capable of avoiding or substantially lessening any significant effects of the proposed Project. The rationale for selecting the alternatives to be evaluated and a discussion of the No Project Alternative are also required, per Section 15126.6.

ES.6.1 Alternatives Evaluated in Preparation of CBU Specific Plan Amendment No. 1 Project

This Draft EIR includes an evaluation of the following alternatives:

- No Project Alternative – Continued Implementation of existing CBU Specific Plan.
- Alternative 1 – Increased Student Housing

ES.6.1.1 No Project Alternative

The No Project Alternative assumes that the Project site would continue to be developed and utilized in accordance with the existing 2013 CBU Specific Plan.[4] Student enrollment would have to be capped at approximately 9,200, and curriculum diversity would have to be maintained at existing levels. Although Project-level impacts would be reduced and the significant and unavoidable impact (i.e., traffic) would be eliminated, the No Project Alternative would impede accommodation of student demand and development of the CBUSP Amendment land use of the site. The proposed Project is considered necessary in order to meet the growth and development goals of CBU. This alternative would not meet the Project objectives; however, CEQA requires the alternative to be analyzed.

ES.6.1.2 Alternative 1: Increases Student Housing

The Increased Student Housing Alternative assumes that the proposed CBUSP Amendment would be implemented. In support of this increase in enrollment, the proposed Project and Increased Student Housing Alternative would result in: 400,000 square feet of additional administrative, academic, recreational, residential and athletic building space; 805,000 square feet of parking structures; and improved baseball, softball and soccer stadiums. In addition to the proposed Project, this Alternative would accommodate increased demand for additional student housing on the CBU campus. In this manner, the projected student housing needs of 1,100 additional student beds would take place over and above the construction of 400,000 square feet of additional building area, 805,000 square feet parking structures, and improved athletic stadiums. The Increased Student Housing Alternative was chosen for its ability to reduce traffic, air quality, and greenhouse gas emissions impacts associated with implementation of the proposed CBUSP Amendment. This Alternative would result in closer proximity between student housing and CBU classrooms, offices, and administrative areas and therefore promote pedestrian and bicycle modes of travel. In this way, the Increased Student Housing Alternative

[4] *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Figure 4-1. Page 36. City of Riverside. Adopted March 26, 2013.

would result in reduced trip making and reduced traffic, air pollution emissions, and GHG emissions impacts. The proposed Project is considered necessary in order to meet the growth and development goals of CBU. This alternative would meet all of the Project's objectives.

ES.6.2 Environmentally Superior Alternative

Table ES-2, Comparison of Impacts of the Alternatives, provides a summary of the alternatives impact analysis considered in the Draft EIR and identifies the areas of potential environmental effects per CEQA, and ranks each alternative as better, the same, or worse than the proposed Project with respect to each issue area.

Table ES-2
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
Aesthetics	Scenic Vistas	LTS	=	=
	Scenic Highways	LTS	=	=
	Visual Character	LTS	=	=
	Light and Glare	LTS	=	=
	Cumulative	LTS	=	=
Agricultural and Forestry Resources	Conversion of Prime, Unique, or Statewide Important Farmland to Non-Agricultural Use	NI	=	=
	Conflict with Agricultural Zoning or Williamson Act	NI	=	=
	Conflict with Existing Forest Land Zoning or Cause Rezoning of Forest Land	NI	=	=
	Conversion of Forest Land to Non-Forest Use	NI	=	=
	Other Changes that would Convert Farmland or Forest Land	NI	=	=
	Cumulative	NI	=	=
Air Quality	Conflict with or Obstruct an Air Quality Plan	LTS	=	=
	Violate an Air Quality Standard	LTS	= -	= -
	Result in Cumulatively Considerable Net Increase in any Criteria Pollutant	LTS	= -	= -
	Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	= -	= -
	Create Objectionable Odors	LTS	=	=
	Cumulative	LTS	= -	= -

Table ES-2
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
Biology	Candidate, Non-listed Sensitive, or Special-Status Species	LTS (MM)	=	=
	Riparian Habitat or Other Sensitive Natural Communities	LTS	=	=
	Jurisdictional Waters/Wetlands	LTS	=	=
	Wildlife Movement and Migratory Species	LTS	=	=
	Adopted Policies and/or Ordinances	LTS	=	=
	Adopted habitat Conservation Plans	LTS	=	=
	Cumulative	LTS (MM)	=	=
Cultural and Paleontological Resources	Historic Resources	LTS	=	=
	Archaeological Resources	LTS (MM)	=	=
	Paleontological Resources	LTS	=	=
	Human Remains	LTS	=	=
	Cumulative	LTS (MM)	=	=
Geology and Soils	Fault Rupture	LTS	=	=
	Ground Shaking	LTS	=	=
	Seismic-Related Ground Failure	LTS (MM)	=	=
	Landslides and Rockfalls	LTS	=	=
	Soil Erosion or Loss of Topsoil	LTS	=	=
	Unstable Soils	LTS (MM)	=	=
	Expansive Soils	LTS (MM)	=	=
	Septic Tanks	LTS	=	=
	Cumulative	LTS (MM)	=	=
Greenhouse Gas Emissions	Greenhouse Gas Emissions	LTS	= -	= -
	Conflict with Applicable Plan Policy, or Regulation	LTS (MM)	= -	= -
	Cumulative	LTS (MM)	= -	= -
Hazards	Routine Transport, use, or Disposal of Hazardous Materials	LTS	=	=
	Reasonably Foreseeable Upset and Accident Conditions	LTS (MM)	=	=
	Emit Hazards Near Existing or Proposed School	LTS	=	=
	Located on a Listed Hazardous Materials Site	LTS (MM)	=	=
	Within an Airport Land Use Plan or Within Two Miles of a Public Airport	LTS (MM)	=	=

Table ES-2
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
	Within Vicinity of a Private Airport	LTS (MM)	=	=
	Conflict with Emergency Response Plans	LTS	=	=
	Wildland Fire Risks	NI	=	=
	Cumulative	LTS (MM)	=	=
Hydrology and Water Quality	Water Quality Standards or Waste Discharge Requirements	LTS	=	=
	Groundwater	LTS	=	=
	Alter Drainage Resulting in Erosion or Siltation Offsite	LTS	=	=
	Alter Drainage or Increase of Surface Runoff Resulting in Flooding On- or Off-site	LTS	=	=
	Runoff Exceeding Capacity of Existing or Planned Facilities	LTS	=	=
	Otherwise Degrade Water Quality	LTS	=	=
	Place Housing in Flood Hazard Areas	NI	=	=
	Place Structures that Impede or Redirect Flood Flows	LTS	=	=
	Dam Inundation Impacts	LTS	=	=
	Inundation by Seiche, Tsunami, or Mudflow	LTS	=	=
	Cumulative	LTS	=	=
Land Use and Planning	Physically Divide an Established Community	LTS	=	=
	Conflict with Applicable Land Use Plans, Policies, or Regulations	LTS	=	=
	Conflict with Any Applicable Habitat or Natural Community Conservation Plan	LTS	=	=
	Cumulative	LTS	=	=
Mineral Resources	Loss of Statewide or Regional Important Mineral Resources	NI	=	=
	Loss of Locally Important Mineral Resources	NI	=	=
	Cumulative	NI	=	=
Noise	Exposure of Persons or Generation of Noise in Excess of Standards Established by the General Plan or Noise Ordinance	LTS (MM)	=	=
	Groundborne Vibration	LTS (MM)	=	=

Table ES-2
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
	Substantial Permanent Increase in Ambient Noise	LTS (MM)	=	=
	Substantial Temporary or Periodic Increase in Ambient Noise	LTS (MM)	=	=
	Exposure to Excessive Noise from Public Airport	LTS	=	=
	Exposure to Excessive Noise from Private Airport	LTS	=	=
	Cumulative	LTS (MM)	=	=
Population, Housing, and Employment	Population Growth	LTS	=	=
	Displace Housing	LTS	=	=
	Displace People	LTS	=	=
	Cumulative	LTS	=	=
Public Services and Faculties	Police Protection Facilities	LTS	=	=
	Fire Protection Facilities	LTS	=	=
	School Facilities	NI	=	=
	Library Facilities	LTS	=	=
	Other Facilities	LTS	=	=
	Cumulative	LTS	=	=
Recreation and Parks	Existing Recreational and Park Facilities	LTS	=	=
	New or Physically Altered Recreation and Park Facilities	LTS	=	=
	Cumulative	LTS	=	=
Transportation and Traffic	Conflict with Applicable Plan, Ordinance, or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System	SIG (MM)	←SIG	←SIG
	Conflict with Applicable Congestion Management Program	SIG (MM)	←SIG	←SIG
	Air Traffic Patterns	LTS	=	=
	Design Features or incompatible Uses	LTS	=	=
	Inadequate Emergency Access	LTS	=	=
	Public Transit, Bicycle, or Pedestrian Facilities	LTS	=	=
	Cumulative	SIG (MM)	←SIG	←SIG
Tribal Cultural Resources	Listed or Eligible Tribal Cultural Resources	LTS	=	=
	Lead Agency Defined Tribal Cultural Resources	LTS	=	=

Table ES-2
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
	Cumulative	LTS	=	=
Utilities and Service Systems	Wastewater Treatment Requirements	LTS	=	=
	Require Construction of Additional Water and/or Wastewater Treatment Facilities	LTS	=	=
	Require Construction of Additional Storm Water Drainage Facilities	LTS	=	=
	Sufficient Water Supplies	LTS	=	=
	Wastewater Treatment Capacity	LTS	=	=
	Sufficient Landfill Capacity	LTS	=	=
	Solid Waste Regulations	LTS	=	=
	Cumulative	LTS	=	=
Energy Conservation	Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	=	=
	Conflict Energy Standards and Regulations	LTS	=	=
	Significant Demand on Local and Regional Energy Supplies	LTS	=	=
	Cumulative	LTS	=	=

Impact Abbreviations
NI: No Impact
LTS: Less than Significant Impact
LTS (MM): Less than Significant Impact with Mitigation
SIG (MM): Significant Impact with Mitigation

Project Alternatives
= Compared with the proposed Project, no change in the quantity of impact or significance of the impact.
= - Compared with the proposed Project, the volume or extent of the impact is reduced but the significance remains the same.
= + Compared with the proposed Project, the volume or extent of the impact is reduced but the significance remains the same.
➔ Compared with the proposed Project, the significance of the impact is increased.
← Compared with the proposed Project, the significance of the impact is reduced.
←SIG Compared with the proposed Project, the volume or extent of the impact is reduced, yet still significant.
➔SIG Compared with the proposed Project, the volume or extent of the impact is increased and still significant.

As indicated in Table ES-2, the No Project Alternative would result in the least environmental impacts, and based on this would be considered the environmentally superior alternative. However, Section 15126.6(e)(2) of the CEQA Guidelines states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.

Given there is only one additional alternative considered after the No Project Alternative, the Increased Student Housing Alternative is considered to be the Environmentally Superior Alternative. The Increased Student Housing Alternative would reduce the volume or extent of

impacts related to air quality, greenhouse gas emissions, and traffic, although the significant and unavoidable traffic impact would remain until such time that the improvements envisioned in the recently competed SR-91/Adams Street Project Study Report are constructed and in operation.

Although the Increased Student Housing Alternative is the Environmentally Superior Alternative, and would reduce the severity of impacts related to air quality, greenhouse gas emissions, and traffic, the traffic impact would remain significant and unavoidable in the same manner as the Proposed Project until such time that the improvements envisioned in the recently competed SR-91/Adams Street Project Study Report are constructed and in operation. The Increased Student Housing Alternative would meet five of eight Project objectives, with Objectives 1, 3, and 8 not met. The Increased Student Housing Alternative has been rejected because it fails to meet three of the Project's basic objectives.

CHAPTER 1.0
INTRODUCTION

1.1 PURPOSE AND SCOPE

The purpose of this Draft Environmental Impact Report (Draft EIR) is to evaluate and disclose potential environmental impacts resulting from the implementation of the proposed California Baptist University (CBU) Specific Plan Amendment (proposed Project). The approximately 167-acre Project area is located generally at 8432 Magnolia Avenue in Riverside, Riverside County, California. The location of the proposed Project is illustrated in Figure 1-1, Regional and Project Location, and Figure 1-2, Aerial View of the Project Area.

Development administered by CBU is subject to the CBU Specific Plan (CBUSP), adopted March 26, 2013 under Resolution No. 22511 and Ordinance No. 7203.[1] The CBUSP implements goals and policies contained in the City's *General Plan 2025* by defining land use controls and development standards tailored to CBU. The CBUSP ensures that development within the CBUSP Planning Area is conducted in a coordinated manner, with adequate consideration given to land uses, infrastructure, cultural and natural resources, public services, and public safety. Since adoption of the CBUSP in 2013, the CBU campus has continued to grow both in area and student population. A comprehensive CBUSP Amendment (proposed Project) is proposed by CBU to accommodate a projected increase in student enrollment to 12,000 total students by 2025, under a more urban-intensity type of development.

The CBUSP Amendment would establish a single zoning district defined as the CBU Specific Plan Zone consisting of two subdistricts, CBU SP-1 and CBU SP-2 (Figure 1-3). CBU SP-1 covers the approximately 147.25-acre campus core. CBU SP-2 covers approximately 19.75 acres on six off-site properties on Monroe Street, Magnolia Avenue and Adams Street. CBU SP-1 includes all CBU properties generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street. CBU SP-2 includes properties administered by CBU outside of the CBU SP-1 Planning Area (i.e., the original campus core), albeit immediately adjacent to or within two blocks of the campus core (Figure 1-3).

The CBU Specific Plan Zone subareas are defined to regulate building height, density, and setbacks, as well as uses permitted by right, by Minor Conditional Use Permit (MCUP), by Conditional Use Permit (CUP), or uses not permitted within a specific subarea (Figure 1-3). While some uses

[1] *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Figure 4-1. Page 36. City of Riverside. Adopted March 26, 2013

THIS PAGE INTENTIONALLY LEFT BLANK

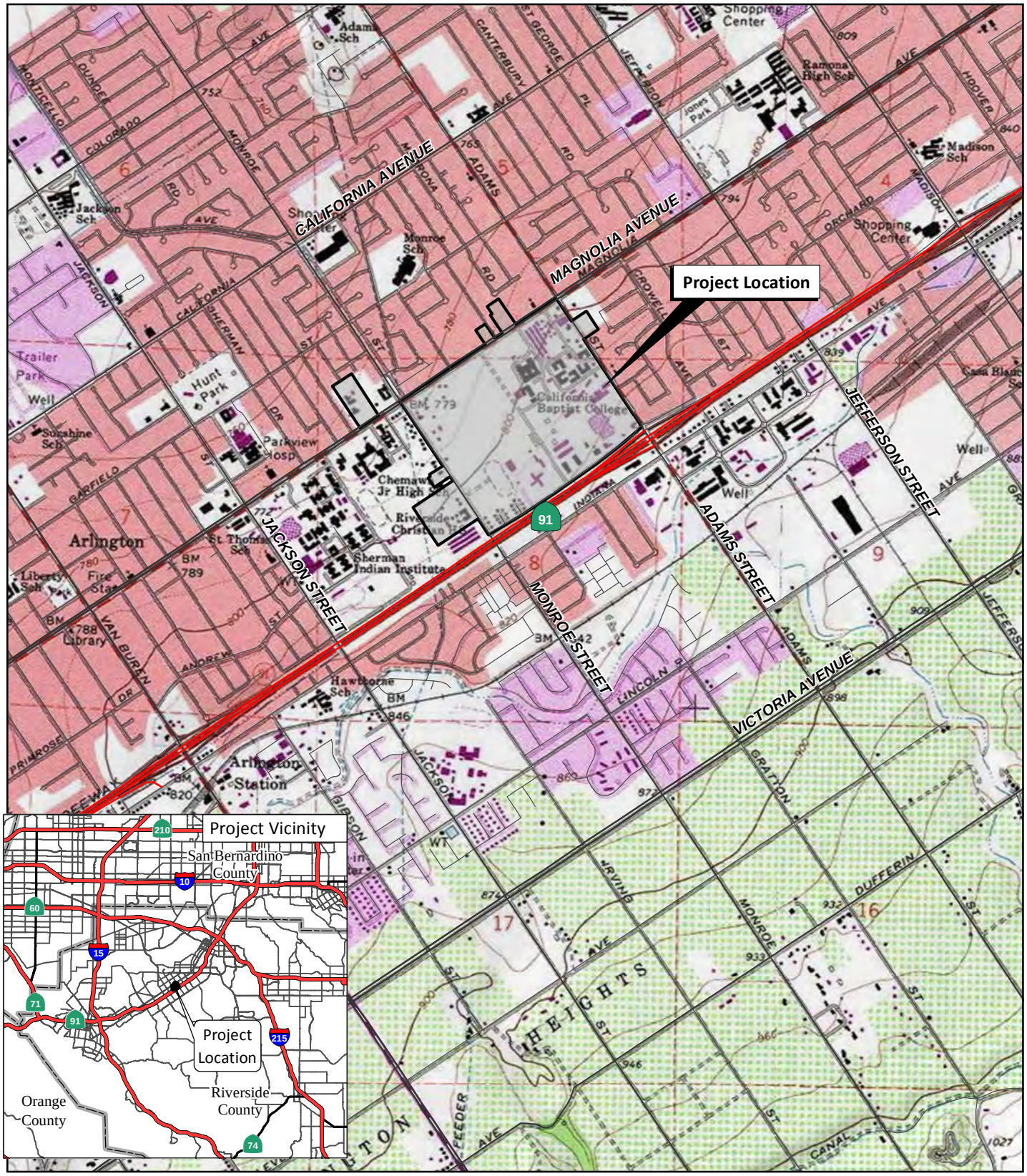


FIGURE 1-1

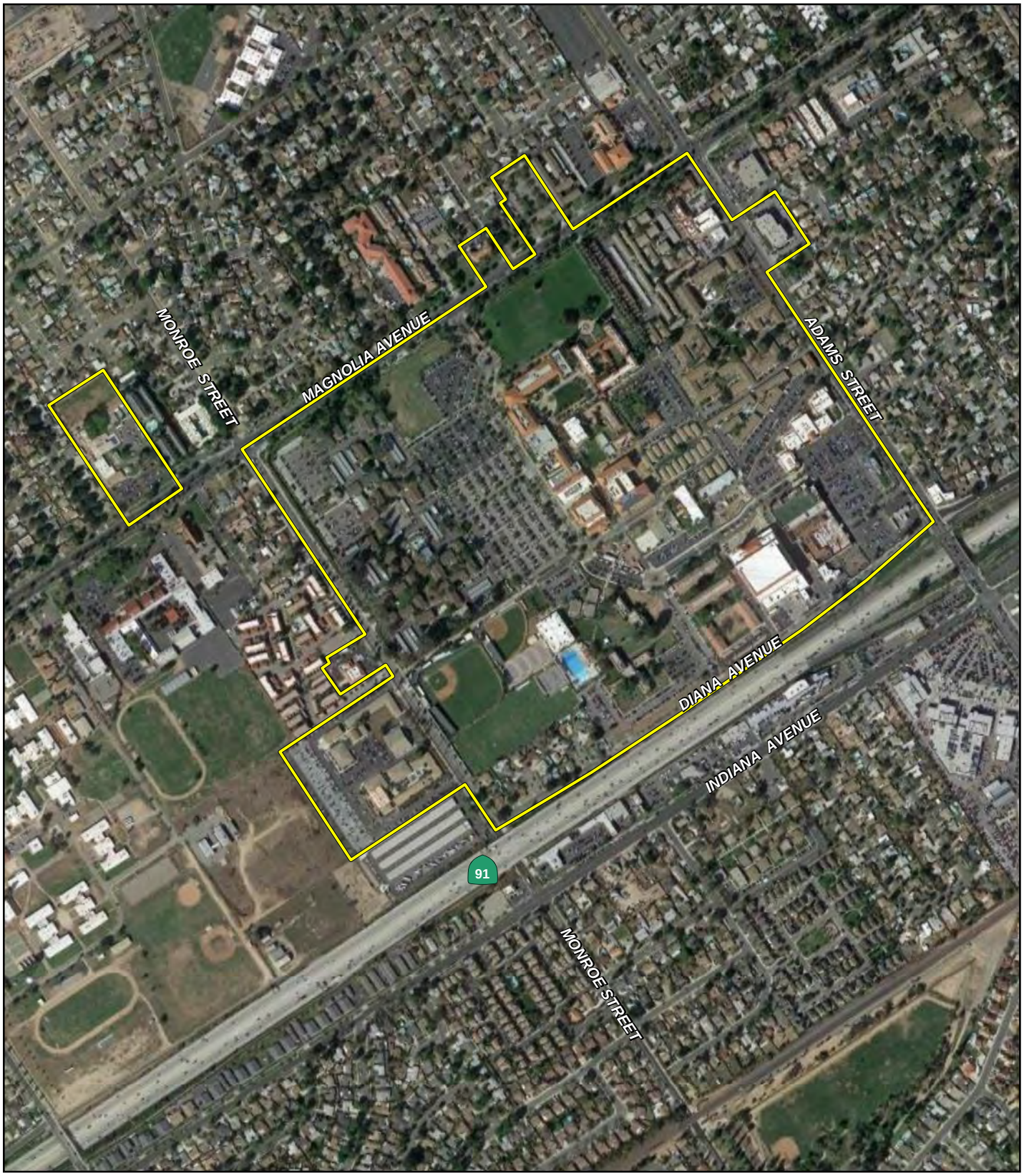
California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Regional and Project Location

SOURCE: USGS 7.5' Quad: Riverside West (1980), CA; Riverside County, 2014

I:\CTR1501\Reports\EIR\fig1-1_RegLoc.mxd (8/8/2018)

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

LEGEND

CBUSP Planning Area

N

0 350 700

FEET

SOURCE: Google, 2016.

FIGURE 1-2

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Aerial View of Project Area

I:\CTR1501\Reports\EIR\fig1-2_AerialView.mxd (8/8/2018)

THIS PAGE INTENTIONALLY LEFT BLANK

LSA

FIGURE 1-3

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

California Baptist University Specific Plan Zone and Subdistricts

SOURCE: *California Baptist University Specific Plan, Public Review Draft*, City of Riverside, July 2018.
I:\CTR1501\Reports\EIR\fig1-3_SpecificPlanZone+Subdistricts_08-13-2018.psd

THIS PAGE INTENTIONALLY LEFT BLANK

would be permitted in one subarea, they would be conditionally permitted or, for select uses such as parking structures or outdoor athletic facilities, not permitted in the other subarea (refer to Table 3.C in this EIR and Table 4-1 in the CBUSP). Additionally, each subarea has distinct height and density standards, as set forth in Chapter 4 (Land Use Regulations and Development Standards) of the CBUSP Amendment. The proposed CBUSP Amendment will be analyzed in this Draft EIR as a comprehensive policy and regulatory guidance document for the private use and development of all properties within the 167-acre CBU Specific Plan Zone.

1.2 AUTHORIZATION

The Draft EIR has been prepared by the City of Riverside (City) as "Lead Agency" in accordance with the Guidelines for the implementation of the California Environmental Quality Act (State CEQA Guidelines), (Sections 15000-15387 of the California Code of Regulations), and the City's CEQA Guidelines. The proposed Project considered in this Draft EIR is a "project," as defined by Section 15378 of the State CEQA Guidelines Section, which state that an EIR must be prepared for any project that may have a significant impact on the environment. The City, as Lead Agency, has determined that the proposed Project may have a significant adverse impact on the environment; therefore, preparation of an EIR was required.

1.3 LEAD AND RESPONSIBLE AGENCIES

CEQA defines a "Lead Agency" as the public agency that has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment. Other agencies (e.g., Riverside County Airport Land Use Commission, Regional Water Quality Control Board, South Coast Air Quality Management District, etc.) which also have some authority or responsibility to issue permits for project implementation, are designated as "responsible agencies." Both the Lead Agency and responsible agencies must consider the information contained in the EIR prior to acting upon or approving a project. The City is the Lead Agency for the Project.

Responsible agencies for the Project include:

- Riverside County Airport Land Use Commission – Riverside County Airport Land Use Compatibility Plan.
- South Coast Air Quality Management District (SCAQMD) – Dust Control Plan.
- Regional Water Quality Control Board (RWQCB), Santa Ana Region – National Pollutant Discharge Elimination System (NPDES) Construction General Permit.
    - RWQCB, Santa Ana Region – Storm Water Pollution Prevention Plan (SWPPP).

- RWQCB, Santa Ana Region – 401 Water Quality Certification – Waste Discharge Requirement (WDR).
- RWQCB, Santa Ana Region – Water Quality Management Plan (WQMP).

1.4 PROJECT APPLICANT

The Project Applicant is:

California Baptist University
8432 Magnolia Avenue
Riverside, CA 92504
(877) 228-3615

1.5 COMPLIANCE WITH CEQA

1.5.1 Environmental Procedures

The basic purposes of CEQA are to:

1. Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify the ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved (Section 15002).

The EIR document typically consists of three parts: (1) the Notice of Preparation (NOP); (2) Draft EIR; and (3) Final EIR. Pursuant to Section 15060(d) of the State CEQA Guidelines, the City initiated the environmental process without preparation of an Initial Study and proceeded directly to preparation of the NOP. The NOP was intended to encourage interagency and public communication concerning the proposed action and provide sufficient background information about the proposed action so that agencies, organizations, and individuals could respond with specific comments and questions on the scope and content of the Draft EIR. The NOP and a description of potential impacts were distributed to the State Clearinghouse (SCH), responsible agencies, adjacent property owners, and other interested parties on May 2, 2016. Pursuant to

Section 15082 of the CEQA Guidelines, recipients of the NOP were requested to provide responses within 30 days after their receipt of the NOP. After the 30-day public review period of the NOP, which ended on May 31, 2016, a total of six (6) response letters had been received by the City (Table 1.A), which includes a letter from the SCH confirming it received and forwarded the NOP materials to applicable State agencies for review. The SCH has given the Project SCH No. 2016051004. Copies of the NOP, NOP response letters, and the NOP distribution list are located in Appendix A. All comments received during the NOP public notice period were considered during the preparation of this Draft EIR.

Table 1.A
Summary of Comments Received in Response to the NOP

Date	Written or Verbal Comment	Commenting Agency or Property Owner	Summary of Comment	Relevant EIR Section
May 2, 2016	Written	California Office of Planning and Research, State Clearinghouse (SCH)	Confirmed receipt of NOP. Provided a list of state agencies that the NOP was transmitted to. Set the NOP review period from May 2 to May 31, 2016.	Chapter 1 - Introduction
May 5, 2016	Written	Native American Heritage Commission (NAHC)	The NAHC states the project is subject to California Government Code Sections 65040.2, 65352.3 et seq. The NAHC notes the following: • CEQA was modified via AB 52, and tribal consultation is now required under both AB52 and SB18. • Outlines the basic provisions of AB 52 consultation. • Outlines the basic provisions of SB 18 consultation. • Outlines basic recommendations for the preparation of Cultural Resource Assessments.	Section 4.5 - Cultural Resources
May 10, 2016	Written	California Department of Transportation (Caltrans), District 8, Planning	Caltrans states that the project will have no lasting effects on the State Highway System (SHS), and therefore has no further comments. Caltrans requests, however, that if the project is modified in any way that copies of revised plans be forwarded to Caltrans so that they may re-evaluate potential impacts to the SHS.	Section 4.16 - Transportation and Traffic

Table 1.A
Summary of Comments Received in Response to the NOP

Date	Written or Verbal Comment	Commenting Agency or Property Owner	Summary of Comment	Relevant EIR Section
May 11, 2016	Written	South Coast Air Quality Management District (SCAQMD)	SCAQMD outlines basic recommendations to reduce potential air quality impacts from the proposed project, and requests a copy of the Draft EIR upon its completion.	Section 4.3 - Air Quality
May 19, 2016	Written	The Metropolitan Water District of Southern California	Metropolitan owns and operates the 124-inch-inside-diameter Upper Feeder Pipeline within a 40-foot-wide easement along the western portion of the project site. Any proposed uses within or in proximity to Metropolitan's easement must be reviewed and approved by Metropolitan in writing.	Section 4.18 - Utilities and Service Systems
June 2, 2016	Written	Department of Toxic Substances Control	Structures build prior to 1978 must be tested for lead and asbestos prior to any construction and/or renovation of those structures. Any areas of the CBU campus previously used for agriculture must be tested for pesticides and fertilizers prior to development or redevelopment in those areas. Any response actions generated by the aforementioned investigations must be discussed in the EIR and mitigated to the extent feasible.	Section 4.8 - Hazards and Hazardous Material

An EIR is an informational document "which will inform public agency decision-makers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project" (Section 15121 of the CEQA Guidelines). The purpose of this Draft EIR is to present the evaluation of the anticipated significant environmental effects of the proposed Project, identify existing processes or measures to minimize the significant effects, and evaluate alternatives to the Project that would minimize the significant effects.

Having the authority to take action on the proposed Project, the City Planning Commission and City Council will consider the information in this EIR in their evaluations of the proposal. The findings and conclusions presented in the EIR regarding environmental impacts do not control the City's discretion to approve, deny, or modify the Project, but instead are presented as information to aid the decision-making process.

As set forth in Section 15021 of the State CEQA Guidelines, the City, as Lead Agency, has the duty to avoid or minimize environmental damage where feasible. Furthermore, Section 15021(d) of the State CEQA Guidelines states that:

> CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, environmental, and social factors and in particular the goal of providing a decent home and satisfying living environment for every Californian. An agency shall prepare a statement of overriding considerations as described in Section 15093 to reflect the ultimate balancing of competing public objectives when the agency decides to approve a project that will cause one or more significant effects on the environment.

In accordance with CEQA, the Lead Agency will be required to make findings for each environmental impact of the project that cannot be mitigated to a less than significant level. If the Lead Agency determines that the benefits of the proposed Project outweigh unmitigated, significant environmental effects, it will be required to adopt a Statement of Overriding Considerations stating the reasons supporting its action notwithstanding the project's significant environmental effects.

The Draft EIR will be made available for review to the public and public agencies for 45 days to provide comments on the "sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (14 CCR Section 15204).

1.5.2 Potentially Significant Environmental Effects

CEQA requires consideration and discussion of significant environmental effects. Sections 15126-15126.2 of the State CEQA Guidelines state that, "All phases of a project must be considered when evaluating its impacts on the environment: planning, acquisition, development, and operation […] an EIR shall identify and focus on the significant environmental effects of the proposed project." CEQA provides that a Draft EIR shall focus on all potentially significant effects created by the Project onto the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence. Effects dismissed in an Initial Study as insignificant and unlikely to occur need not be discussed further in the Draft EIR unless information inconsistent with the finding in the Initial Study is subsequently received. However, no Initial Study was prepared for this Project, and as such, no effects were determined to be less than significant prior to preparation of the Draft EIR.

Section 4 of the Draft EIR addresses each environmental effect that was determined to be potentially significant during preparation of the Project's NOP (Appendix A). Each effect is organized into an issue area; those that will be analyzed (and the section of the Draft EIR in which the analysis is contained) are listed below:

- Aesthetics (Section 4.1)
- Agricultural & Forestry Resources (Section 4.2)
- Air Quality (Section 4.3)
- Biological Resources (Section 4.4)
- Cultural Resources (Section 4.5)
- Geology & Soils (Section 4.6)
- Greenhouse Gas Emissions (Section 4.7)
- Hazards & Hazardous Materials (Section 4.8)
- Hydrology & Water Quality (Section 4.9)
- Land Use & Planning (Section 4.10)
- Mineral Resources (Section 4.11)
- Noise (Section 4.12)
- Population/Housing (Section 4.13)
- Public Services (Section 4.14)
- Recreation (Section 4.15)
- Transportation/Traffic (Section 4.16)
- Tribal Cultural Resources (Section 4.17)
- Utilities & Service Systems (Section 4.18)
- Energy Conservation (Section 4.19)

1.5.3 Format

This Draft EIR has been organized in several sections as follows:

Table of Contents to assist readers in locating the analysis of different subjects and issues as required by Section 15122 of the State CEQA Guidelines.

Executive Summary covers requirements of CEQA as required by Section 15123 of the State CEQA Guidelines and includes: the proposed Project location, a brief project description, a matrix containing a summary of environmental impacts and mitigation measures, Project objectives, approvals related to the proposed Project, areas of controversy, and a brief description of the Project alternatives.

Section 1 – Introduction describes the scope and purpose of the Draft EIR, identifies the Lead Agency and Project Applicant, provides a brief summary of the CEQA process to date,

summarizes and identifies the documents incorporated by reference in the Draft EIR, and identifies the location in the Draft EIR in which the comments are addressed.

Section 2 – Project Description contains the information required by Section 15124 of the State CEQA Guidelines including: a detailed description of the proposed Project, the Project objectives, a general description of the Project's environmental setting, the approvals needed to implement the Project, and a list of agencies expected to use the Draft EIR.

Section 3 – Environmental Effects Found Not To Be Significant summarizes the issues found to have no impact or less than significant impact as part of the EIR process, issues found to be less than significant with mitigation measures incorporated, and issues found to be significant even with mitigation measures incorporated.

Section 4 – Environmental Impact Analysis satisfies the requirements of Sections 15125, 15126, 15126.2, and 15126.4 of the State CEQA Guidelines by including an analysis of each environmental issue area determined to have potentially significant impacts during preparation of the NOP or as a result of comments received in response to the NOP. For each issue area analyzed, this section includes a discussion of the setting to which each issue area is analyzed against, defines the related regulations affecting the proposed Project, identifies the thresholds used to determine significance, describes any Project design features that would reduce impacts, analyzes the proposed Project's impacts, provides a description of the mitigation measures used to reduce or lessen potential impacts, and discusses the Project's impacts after mitigation.

Section 5 – Other CEQA Topics contains discussions of additional topics required by CEQA, including unavoidable effects of the proposed Project and significant irreversible environmental changes.

Section 6 – Cumulative Impact Analysis describes the Project's cumulative impacts for each environmental topic analyzed in Section 4.

Section 7 – Alternatives to the Proposed Project satisfies the requirements of Section 15126.6 of the State CEQA Guidelines by identifying and discussing the no Project Alternative in addition to alternatives to the proposed Project that lessen the severity of significant impacts and identifying the environmentally superior alternative.

Section 8 – Growth Inducing Impacts includes a discussion of how the proposed Project could induce economic or population growth, either directly or indirectly, in the surrounding environment.

Section 9 – References includes a listing of all reference materials, the organizations and persons contacted in preparing the Draft EIR, and a list of preparers as required by Section 15129 of the State CEQA Guidelines.

Section 10 – List of Preparers lists the organizations and persons consulted in preparation of the EIR.

Section 11 – Acronyms and Abbreviations lists acronyms and abbreviations used in the Draft EIR and definitions of terms used, including those specific to the proposed Project.

1.6 DOCUMENTS INCORPORATED BY REFERENCE

Section 15150 of the State CEQA Guidelines permits and encourages an environmental document to incorporate, by reference, other documents that provide relevant data. The documents summarized below are incorporated by reference, and the pertinent material is summarized throughout this Draft EIR, where the information is relevant to the analysis of potential of the Project. All documents incorporated by reference are available for review at, or can be obtained through, the City of Riverside Planning Division of the Community & Economic Development Department. Technical studies cited throughout the Draft EIR were specifically developed in conjunction with the proposed Project. Where noted as appendices, the reports are included in their entirety in the CD-ROM version of the Draft EIR, and are also included in the CD-ROM attached to the front cover of hard copy versions of the Draft EIR.

1.6.1 City of Riverside General Plan 2025 and General Plan 2025 Final Program Environmental Impact Report

The City of Riverside General Plan 2025, adopted November 2007, provides a framework for the physical development of the City and forms the basis of decisions concerning the development of property. To this end, the General Plan 2025 establishes City land use and development policies, and identifies planned land uses and supporting infrastructure systems. Elements in the General Plan 2025 include the Land Use and Urban Design, Circulation and Community Mobility, Housing, Arts and Culture, Education, Public Safety, Noise, Open Space and Conservation, Air Quality, Public Facilities and Infrastructure, Parks and Recreation, and Historic Preservation. Development within the General Plan Area will be shaped by the General Plan's Goals, Objectives, and Policies, which are integral to each of the General Plan Elements. The City of Riverside General Plan 2025 and General Plan 2025 Final Program EIR documents contain background information used in this Draft EIR. These General Plan documents are available at the City of Riverside website: https://www.riversideca.gov/planning/gp2025program/general-plan.asp.

1.6.2 California Baptist University Specific Plan (2013), Resolution No. 22511, Ordinance No. 7203

The 2013 CBUSP is a regulatory tool used to implement the City's General Plan 2025 and guide development on the CBU campus. The Planning Area covered by the 2013 CBUSP includes the campus core plus the four additional properties to the north along Magnolia Boulevard and east along Adams Street. The 2013 CBUSP focuses on the unique characteristics of the CBU campus by customizing land use regulations for that area. The expressed purpose of the 2013 CBUSP is "to establish a vision and context for future development at CBU that ensures an enduring and identifiable dynamic visual image for both the campus and the community, and recognizes the historic resources of the campus and the adjoining Magnolia Avenue Specific Plan (Magnolia Avenue SP)/Magnolia Heritage District that contribute to the cultural richness of the University."[2] The 2013 CBUSP is available at the City of Riverside website: http://www.riversideca.gov/planning/cityplans-csp-cbu.asp.

1.6.3 Initial Study and Mitigated Negative Declaration for the California Baptist University Specific Plan. City of Riverside, January 2012

In 2012, the City of Riverside adopted an Initial Study and Mitigated Negative Declaration (IS/MND) for the CBUSP. The MND evaluated potential impacts from the CBUSP associated with aesthetics, biological resources, greenhouse gas emissions, air quality, land use planning, population and housing, transportation, cultural resources, hazards and hazardous materials, utility services, public services, geology and soils, hydrology, noise, and recreation. The MND concluded all environmental impacts from implementation of the 2013 CBUSP would be reduced to less than significant levels with mitigation. The IS/MND for the 2013 CBUSP is available at Riverside City Hall, Community & Economic Development Department, Planning Division, 3900 Main Street, Third Floor, Riverside, CA 92522.

1.6.4 City of Riverside Municipal Code and Zoning Ordinance

The City of Riverside Zoning Ordinance (Municipal Code Title 19) codifies and complements the City's General Plan 2025. The Zoning Ordinance, in effect, provides the mechanism to implement and enforce the goals, objectives, policies and programs articulated in the General Plan. Chapter 19.820 (*Specific Plan/Specific Plan Amendments*) requires an application and fee submitted to the City Planning Division stating in detail the reason for the proposed CBUSP

[2] *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Page 1. City of Riverside. Adopted March 26, 2013.

Amendment. In addition, the CBUSP Amendment is subject to approval by the Approving Authority, per the Zoning Code, Chapter 19.650 Approving and Appeal Authority. The provisions of the CBUSP Amendment replace RMC Title 19 (*Zoning Code)* regarding the use, development, and entitlement of properties. Where the Specific Plan is silent with regard to any land use regulations, the provisions of RMC Title 19 (*Zoning Code)* shall apply. However, the standards and guidelines identified in the Specific Plan shall take precedence over the general standards and guidelines contained in the Zoning Code.

Title 20 - Cultural Resources of the City's Municipal Code provides for the identification, protection, enhancement, perpetuation, and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features, and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic, and/or artistic value in the City. Many of the potential environmental concerns considered in this Draft EIR are adequately addressed through application of objectives and policies contained in the proposed CBUSP Amendment and Title 20 - Cultural Resources of the City's Municipal Code. The City's Municipal Code is available for review at the following web page: https://www.riversideca.gov/municode/.

1.6.5 Santa Ana River Basin Water Quality Control Plan (Basin Plan)

The Santa Ana Regional Water Quality Control Board (RWQCB) has adopted a Water Quality Control Plan (Basin Plan) for its region of responsibility, which includes the City of Riverside. The RWQCB has delineated water resource area boundaries based on hydrological features. For purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

The Basin Plan has established narrative and numeric water quality objectives for inland surface streams, which include the Santa Ana River. If water quality objectives are exceeded, the RWQCB can use its regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. Relevant surface water quality objectives for the CBU Specific Plan Zone are detailed in Table 4.9.A, and relevant groundwater quality objectives are detailed in Table 4.9.B. The Basin Plan is available for review at the following web page: http://waterboards.ca.gov/santaana/water_issues/programs/basin_plan/.

1.6.6 City of Riverside Green Action Plan

In July 2005, the City of Riverside assembled a Clean and Green Task Force that developed guidelines for a cleaner, greener, and more sustainable city. Its sustainability policy statement highlighted the following categories: save water, keep it clean, make it solar, make it shady, clean the air, save fuel, make it smart, and build green. The task force created a 38-point Clean and Green Sustainable Riverside Action Plan (Green Action Plan) to transform the policy statement into an implementation plan. The Green Action Plan is an evolving document that outlines ways to improve air quality, reduce traffic congestion, increase accessibility and use of parks, and otherwise preserve the environment. The first Riverside Green Action Plan was approved by the City Council in December 2007. To ensure that the tasks of the Green Action Plan would be carried out successfully, the City formed a Green Accountability Performance Committee, and within just two years, nearly all of the plan's 38 tasks had been accomplished. In February 2009, the California Department of Conservation introduced Riverside as California's First Emerald City, and in September 2009, the City introduced a Green Action Plan–Emerald City update. The latest Green Action Plan (2012) includes 19 goals and more than 50 tasks within the following eight areas: energy, GHG emissions, waste, urban design, urban nature, transportation, water, and healthy communities. The Green Action Plan is available for review at the following web page: http://www.greenriverside.com/about-green-riverside/green-action-plan.

THIS PAGE INTENTIONALLY LEFT BLANK

CHAPTER 2.0
PROJECT DESCRIPTION

This Chapter describes the objectives of the proposed California Baptist University (CBU) Specific Plan Amendment (proposed Project) and provides a detailed description of Project characteristics. CBU proposes to amend the CBU Specific Plan (CBUSP) that was approved in 2013. For the purposes of this DEIR, the terms "Project," "proposed Project," "proposed CBUSP Amendment," and "CBUSP Amendment" are used interchangeabley. This section also discusses the proposed Project's objectives and discretionary actions required for the Project and gives a brief description of the environmental effects, which are evaluated in Chapter 3 - Effects Found Not to be Significant, through Chapter 6 - Cumulative Impact Analysis, of this Draft EIR.

2.1 PROJECT LOCATION AND SETTING

The CBU campus is generally located at 8432 Magnolia Avenue in the City of Riverside, Riverside County, California. The Project site consists of an approximately 167-acre Planning Area that comprises the CBUSP. The proposed CBUSP Planning Area includes the orginal campus core plus six additional properties to the north, east and west. The CBUSP Amendment proposes a single zoning district defined as the CBUSP Zone. The CBUSP Zone consists of the approximately 156.4-acre current CBUSP Planning Area (all CBU properties generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street plus the four properties to the north and east along Magnolia Avenue and Adams Street owned and operated by CBU) plus approximately 10.6 acres encompassing the Health Sciences Campus and Wellness Center. The additional areas are located adjacent to or within one block of the original campus core. Refer to Figure 1-1 – Regional and Project Location; Figure 1-2 –Aerial View of Project Area; and Figure 1-3 CBU Specific Plan Zone and Subareas.

The uses adjacent to the proposed Project site are a mixture of single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; and single-family and multi-family residential, commercial and school uses to the west. State Route (SR) 91 is located to the south. General commercial uses are located further south beyond SR-91, including car dealerships.

The CBUSP area consists of the following Assessor's Parcel Numbers:

Subdistrict 1

231-040-025	231-040-027	231-020-026	231-040-012
231-040-003	231-040-006	231-040-023	231-030-024
231-040-004	231-040-007	231-040-017	231-030-028

231-030-029	231-061-014	231-061-003	231-020-006
231-040-014	231-061-013	231-061-002	231-080-009
231-070-016	231-061-012	231-061-001	231-061-005
231-070-007	231-061-011	231-020-026	231-080-005
231-070-017	231-061-010	231-030-027	231-080-026
231-050-004	231-061-009	231-020-010	231-080-027
231-050-005	231-061-008	231-020-009	231-080-028
231-061-017	231-061-007	231-020-008	
231-061-016	231-061-006	231-020-007	
231-061-015	231-061-004	231-020-005	

Subdistict 2

233-120-010	193-253-013	193-321-035	231-090-067
233-110-045	193-322-028	193-321-034	

The latitude and longitude of the approximate center of the site is 33°55'41.50"N and 117°25'32.32"W. The site is within Sections 5 and 8 of Township 3 South, Range 5 West of the Riverside West, California 7.5-minute quadrangle, San Bernardino Baseline and Meridian, as mapped by the U.S. Geological Survey (USGS).

Magnolia Avenue Specific Plan. The College of Health Sciences (3532 Monroe Street) and Wellness Center (3626 Monroe Street) properties outside of the CBU Campus core are currently within the boundaries of the *Magnolia Avenue Specific Plan*. Upon Project approval, the two properties would be removed from the boundaries of the *Magnolia Avenue Specific Plan* via a Specific Plan Amendment.

The *Magnolia Avenue Specific Plan* consists of six Specific Plan Districts. The CBU Campus is located within the Magnolia Heritage District that extends along Magnolia Avenue from Jackson Street to Arlington Avenue. The Magnolia Heritage District is one of the two oldest communities, the other being Arlington Village, located along the original Magnolia Avenue Corridor. The CBU frontage along the Magnolia Heritage District consists of mixed use/academic, mixed use/residential, athletics, and open space. Properties within the Magnolia Heritage District and surrounding the Project site consist primarily of multi-family housing, with some single-family housing and commercial retail uses. According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University. The Design Guidelines outlined in the proposed CBUSP Amendment would replace the design guidelines of the *Magnolia Avenue Specific Plan*.

2.2 PROJECT BACKGROUND

2.2.1 California Baptist University Campus

In 1950, the Los Angeles Southern Baptist Association opened the doors of California Baptist College in the City of El Monte. In 1955, the college relocated to Riverside and became accredited by 1961. In 1998, the college officially became California Baptist University and has undergone extensive growth annually since that time. Today, CBU is one of the top private Christian liberal arts colleges and universities in Southern California offering bachelor's, master's, and credential programs in their Riverside and San Bernardino campuses and online. The 156.4-acre current CBUSP Planning Area contains Spanish-style buildings accommodating classrooms, campus housing, a library, offices, and maintenance and athletic facilities. In the midst of dynamic growth, CBU continues the tradition of education in a Christian environment.

2.2.2 Previous Approvals/History of Project Changes

In 2013, the City of Riverside adopted a Mitigated Negative Declaration (MND) for the CBUSP. The Planning Area covered by the 2013 CBUSP included the campus core plus the four additional properties to the north and east along Magnolia Avenue and Adams Street.

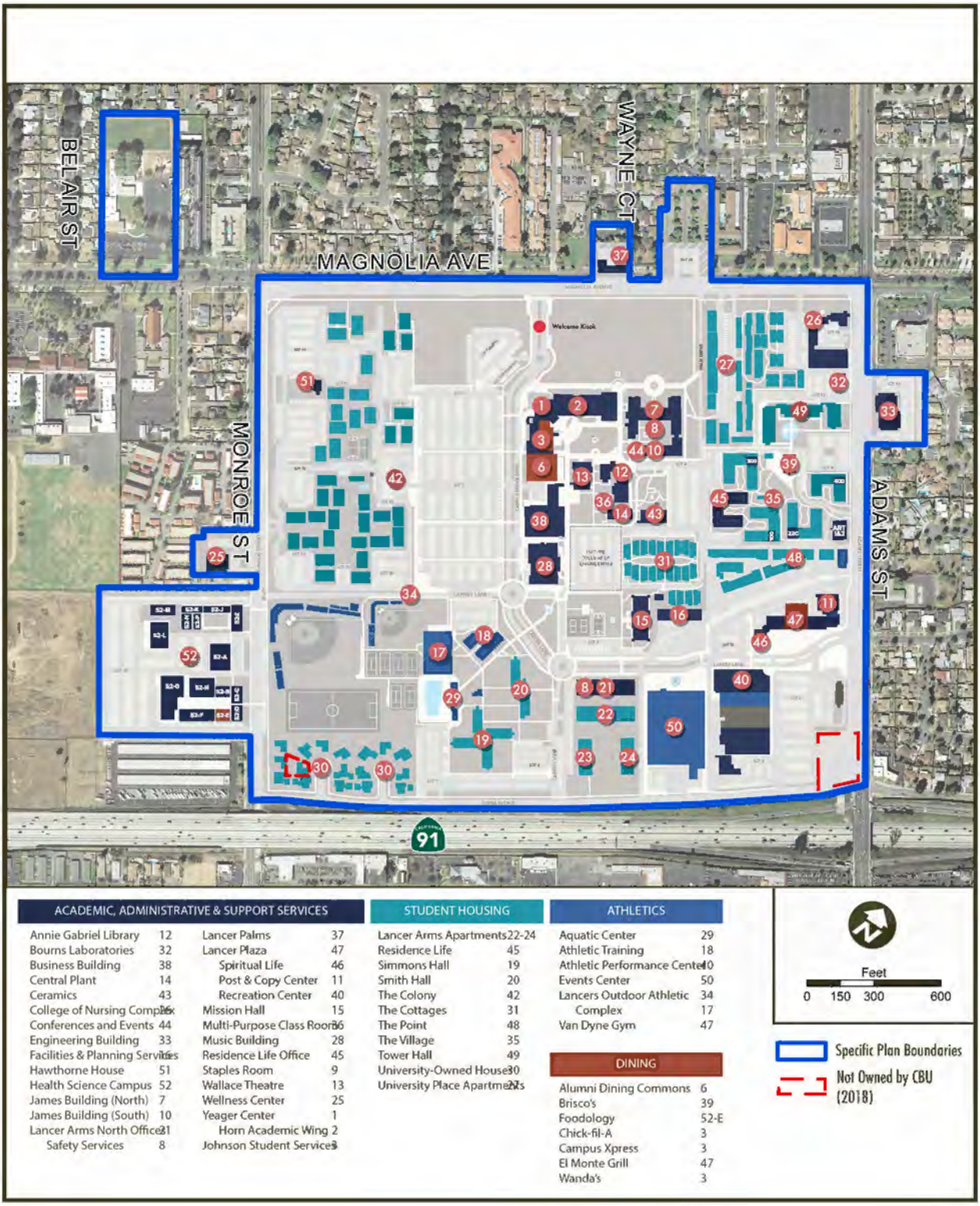
Since adoption of the CBUSP in 2013, the CBU campus has continued to grow both in area and student population.

2.2.3 Project Site – Existing Conditions

As discussed previously, the proposed Project site covers an approximately 167-acre CBUSP Planning Area. The CBU Specific Plan Zone consists of the approximately 156.4-acre current CBUSP Planning Area and approximately 10.6 acres of additional properties along the west side of Monroe Street (Figure 1-3).

The CBUSP Planning Area occupies approximately 815,114 square feet of administrative offices, classrooms, housing, indoor recreational facilities, and other ancillary building area. Previously referenced Figure 1-2 shows an aerial view of the existing conditions of the proposed Project site. Figure 2-1 identifies the names and locations of existing administrative, classroom, housing, indoor recreational, athletic, and open space areas. The existing CBU facilties located within the CBUSP Planning Area are identified in Table 2.A, along with information regarding building area and development quantities.

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

FIGURE 2-1

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Existing CBU Buildings and Recreation Areas 2016

SOURCE: *California Baptist University Specific Plan, Public Review Draft*, City of Riverside, July 2018.
I:\CTR1501\Reports\EIR\fig2-1_ExistingCBUBuildings+RecreationAreas_08-13-2018.psd

THIS PAGE INTENTIONALLY LEFT BLANK

Table 2.A
Existing CBU Facilities

APN	University Facility	Facility Type	CBUSP Subarea
231020005 231020006 231020007 231020008 231020010	Parking Lot 15	Parking	CBU SP-1
231061014	University Housing	Student Housing	CBU SP-1
231040006	Parking Lot 11	Parking	CBU SP-1
231020009	Hawthorne House	Academic and Administrative	CBU SP-1
231040026	• Art 1 & 2 • Resident Life Office • The Village at CBU • Brisco's Cafe	• Academic and Administrative • Student Housing	CBU SP-1
231061012	University Housing	Student Housing	CBU SP-1
231040012	University Place Apartments	Student Housing	CBU SP-1
231070016	• Mission Hall • Facilities and Planning Services • Mission Hall Lawn	• Academic and Administrative • Courtyards	CBU SP-1
231040004	Bourns Laboratories	Academic and Administrative	CBU SP-1
233110045	Riverside Christian Elementary School (Former site)	Academic and Administrative	CBU SP-2
231080012	• Recreation Center • Parking Lots 8-10	• Academic and Administrative • Parking	CBU SP-1
231080005	Wellness Center	Academic and Administrative	CBU SP-1
231061007	University Housing	Student Housing	CBU SP-1
231070007	Events Center	Athletic	CBU SP-1
231040025	• School of Nursing Complex • Lambeth Prayer Garden • Parking Lot 14	• Academic and Administrative • Courtyards • Parking	CBU SP-1

Table 2.A
Existing CBU Facilities

APN	University Facility	Facility Type	CBUSP Subarea
231030028	• Yeager University Center o Horn Academic Wing o Johnson Student Services Wing o Alumni Dining Commons o James Building (north) 2-Story o James Building (south) 4-Story o Music Building o Business Building o Conferences and Events o Staples Room o Smith Courtyard o Stamps Courtyard o Addink Plaza	• Academic and Administrative • Courtyards	CBU SP-1
231061013	University Housing	Student Housing	CBU SP-1
231080016	Spiritual Life	Academic and Administrative	CBU SP-1
231061008	University Housing	Student Housing	CBU SP-1
231061004	University Housing	Student Housing	CBU SP-1
231040023	University Place Apartments	Student Housing	CBU SP-1
231090067	• Architecture Building • Parking Lot 13	• Academic and Administrative • Parking	CBU SP-2
193321035	Parking Lot 24	Parking	CBU SP-2
231030024	Magnolia Lawn	Courtyards	CBU SP-1
231050005	• Lancers Outdoor Athletic Complex • Van Dyne Gym • Athletics Fitness & Training • Aquatic Center	Athletics	CBU SP-1
193322028	Lancer Palms Facilities Administration and Human Resources	Academic and Administrative	CBU SP-2
231061009	University Housing	Student Housing	CBU SP-1
231061011	University Housing	Student Housing	CBU SP-1
231070017	• Lancer Arms North Offices • Public Safety • Lancer Arms Apartments • Parking Lot 5	• Academic and Administrative • Student Housing • Parking	CBU SP-1
231040014	The Point [Apartments]	Student Housing	CBU SP-1
193253013	River Springs Charter School	Academic and Administrative	CBU SP-2

Table 2.A
Existing CBU Facilities

APN	University Facility	Facility Type	CBUSP Subarea
231061002	University Housing	Student Housing	CBU SP-1
231061016	University Housing	Student Housing	CBU SP-1
231080015	Lancer Plaza North	Academic and Administrative	CBU SP-1
231040007	Parking Lot 11	Parking	CBU SP-1
231040017	University Place Apartments	Student Housing	CBU SP-1
231040003	School of Nursing Complex	Academic and Administrative	CBU SP-1
231020026	The Colony at CBU	Student Housing	CBU SP-1
231061006	University Housing	Student Housing	CBU SP-1
231061015	University Housing	Student Housing	CBU SP-1
233120010	Health Science Campus	Academic and Administrative	CBU SP-2
231040027	Tower Hall	Student Housing	CBU SP-1
231050004	• Simmons Hall • Smith Hall	Student Housing	CBU SP-1
231030027	• Parking Lots 1 and 1 North • Parking Lot 2 • Visitor Parking	Parking	CBU SP-1
231030029	• Annie Gabriel Library • Wallace Theatre • Central Plant • Multi-Purpose Class Room • Ceramics • The Cottages • Harden Square • Parking Lots 3 and 4	• Academic and Administrative • Student Housing • Courtyards • Parking	CBU SP-1
231061010	University Housing	Student Housing	CBU SP-1
231061003	University Housing	Student Housing	CBU SP-1
231061017	University Housing	Student Housing	CBU SP-1
231061001	University Housing	Student Housing	CBU SP-1
193321034	Parking Lot 24	Parking	CBU SP-2

For purposes of the preparation of the CBUSP Amendment and analysis in the DEIR, existing development shown in Figure 2-1 and Table 2.A includes the CBU Events Center that was under construction at the time the NOP was distributed in June 2016. At the time of this DEIR, construction of the 149,260 square-foot Events Center has been completed and the facility is in

use. For these reasons, the CEQA baseline for this Draft EIR is the date of the NOP, or May 2, 2016, with the addition of the Events Center.

Development of the CBU campus is currently administered pursuant to the 2013 CBUSP. All CBU properties are served by adequate water, sewer, and dry utilities. Sufficient access and circulation are provided via the main entrance driveway on Campus Bridge Drive at Magnolia Avenue and secondary access from the Lancer Lane, Adams Street and Diana Avenue from Monroe Street and Adams Street. Since adoption of the CBUSP in 2013, the CBU campus has continued to grow both in area and student population.

CBU's student population consists of three student categories: traditional students, graduate students, and online students. The growth in student population is due to the expansion of the curriculum offered. As a matter of University policy, every student enrolled at CBU must live on campus until he or she reaches the age of 21 or if the student receives a specified level of financial aid from the University. Current total student enrollment as of 2015 is approximately 8,414 students. As a result of this policy—and the increasing enrollment demands at the University—student housing has become a priority.

Existing student housing consists of studio apartments, one-bedroom apartments, two-bedroom apartments, and townhomes as shown in Table 2.B. As of 2015, CBU had 2,964 o n-campus beds available for students.

Table 2.B
Existing Student Housing Capacity

Facility Name	Typical Student Bed Capacity
Lancer Arms	168
Smith Hall	153
Simmons Hall	262
The Cottages	189
Tower Hall	270
The Village	292
University Place	390
The Colony	1,024
The Point	216
Total	**2,964**

The number of students housed in the various housing unit types typically are up to two students per studio apartment, two to three students per one-bedroom apartment, up to four students per two-bedroom apartment, and up to five students per townhome.

2.2.4 Land Use Designation and Zoning

Figure 2-2 shows the existing General Plan land use designations for the CBUSP Planning Area and surrounding areas. As shown in Figure 2-2, the CBUSP Plannning Area is currently designated "CBU Specific Plan" by the General Plan with the exception of the Health Scienes Campus that is currenty designated "Public Facilities/Institutional." Figure 2-3 shows existing zoning for the CBUSP Planning Area and surrounding areas. As shown in Figure 2-3, the CBUSP Plannning Area is currently zoned CBUSP-MU/A – CBUSP Mixed-Use/Academic Planning Area, CBUSP-MU/R – CBUSP Mixed-Use/Residential Planning Area, CBUSP-MU/U – CBUSP Mixed-Use/Urban Planning Area, CBUSP-A – CBUSP Athletics Planning Area, CBUSP- OS –CBUSP Open Space Planning Area, and R-1-7000 (Single-Family Residential). Figure 2-4 shows existing CBUSP and *Magnolia Avenue Specific Plan* land use designations for the CBUSP Planning Area and surrounding areas. As shown in Figure 2-4, the CBUSP Plannning Area includes the properties in the existing CBUSP boundary plus the Health Sciences and Wellness Center properties currently in the Magnolia Specific Plan boundary that are proposed for inclusion in the revised CBUSP planning area.

2.3 PROJECT CHARACTERISTICS

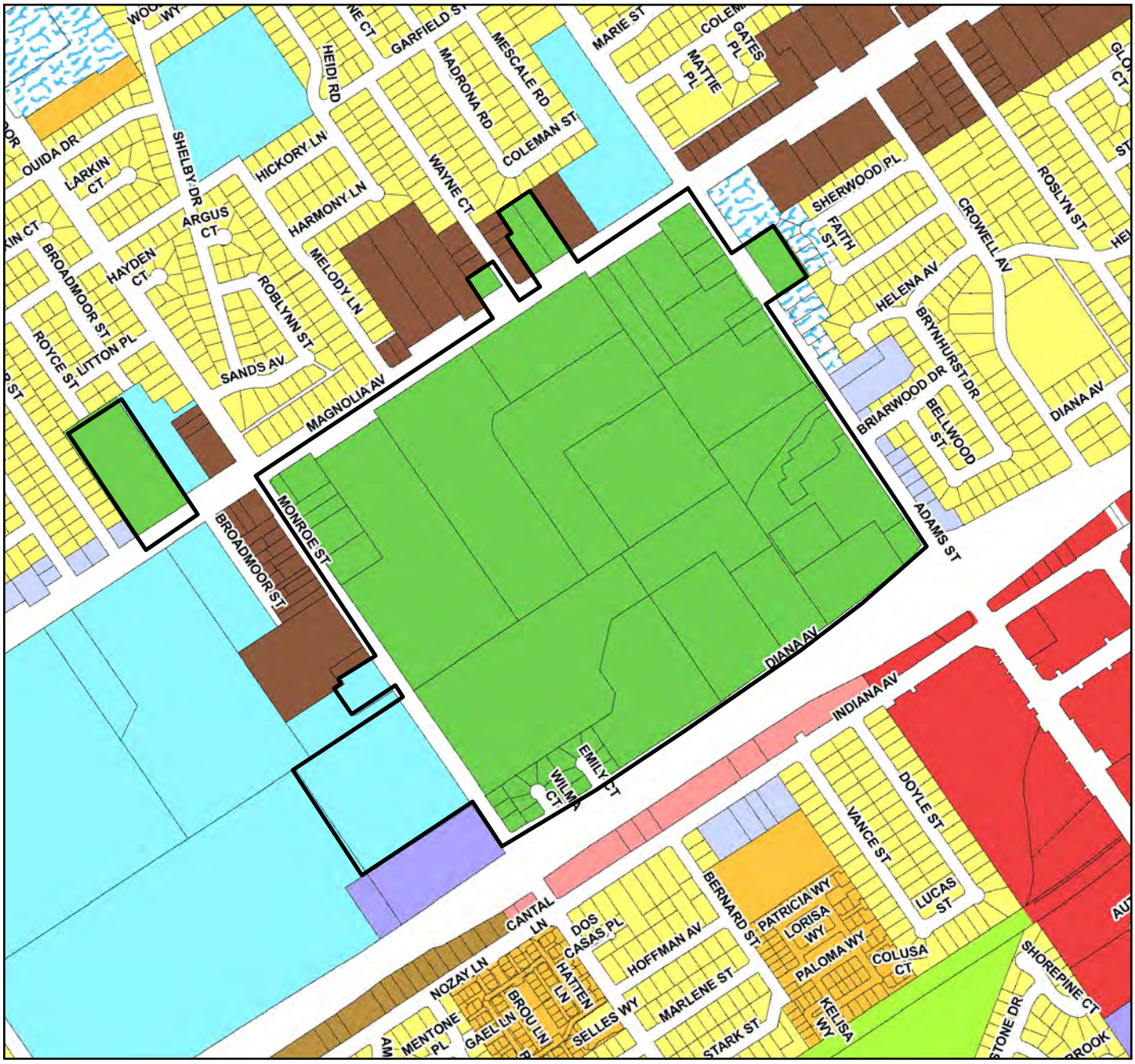
2.3.1 Need for Project

The primary reason to amend the CBUSP is to facilitate an anticipated increase in student enrollment from 8,414 total students in 2015 to 12,000 total students by 2025 due to an expansion of curriculum offered at CBU. The proposed CBUSP Amendment will establish a vision and context for the future development of CBU that ensures an enduring, identifiable, and dynamic image for the campus and the community as it transitions to an urban-style campus from the current suburban model under the existing CBUSP. As stated in the proposed CBUSP Amendment,[1] the Purpose and Intent is to:

- Guide and accommodate the anticipated future growth of the CBU campus;
- Enhance and support the CBU Community, including academics, student organizations, and athletics;
- Establish and maintain an appropriate and viable mix of land uses;
- Encourage sustainable development;

[1] *California Baptist University Specific Plan Amendment* Chapter 1, Section A. City of Riverside. Public Review Draft, August 2018.

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

FIGURE 2-2

- CBU Specific Plan Zone
- CBUSP
- MDR: Medium Density Residential
- MHDR: Medium High Density Residential
- HDR: High Density Residential
- VHDR: Very High Density Residential
- C - Commercial
- CRC - Commercial Regional Center
- O: Office
- B/OP: Business/Office Park
- MU-V - Mixed Use Village
- MU-U - Mixed Use Urban
- PF: Public Facilities/Institutional
- P: Public Park

N

0 400 800
FEET

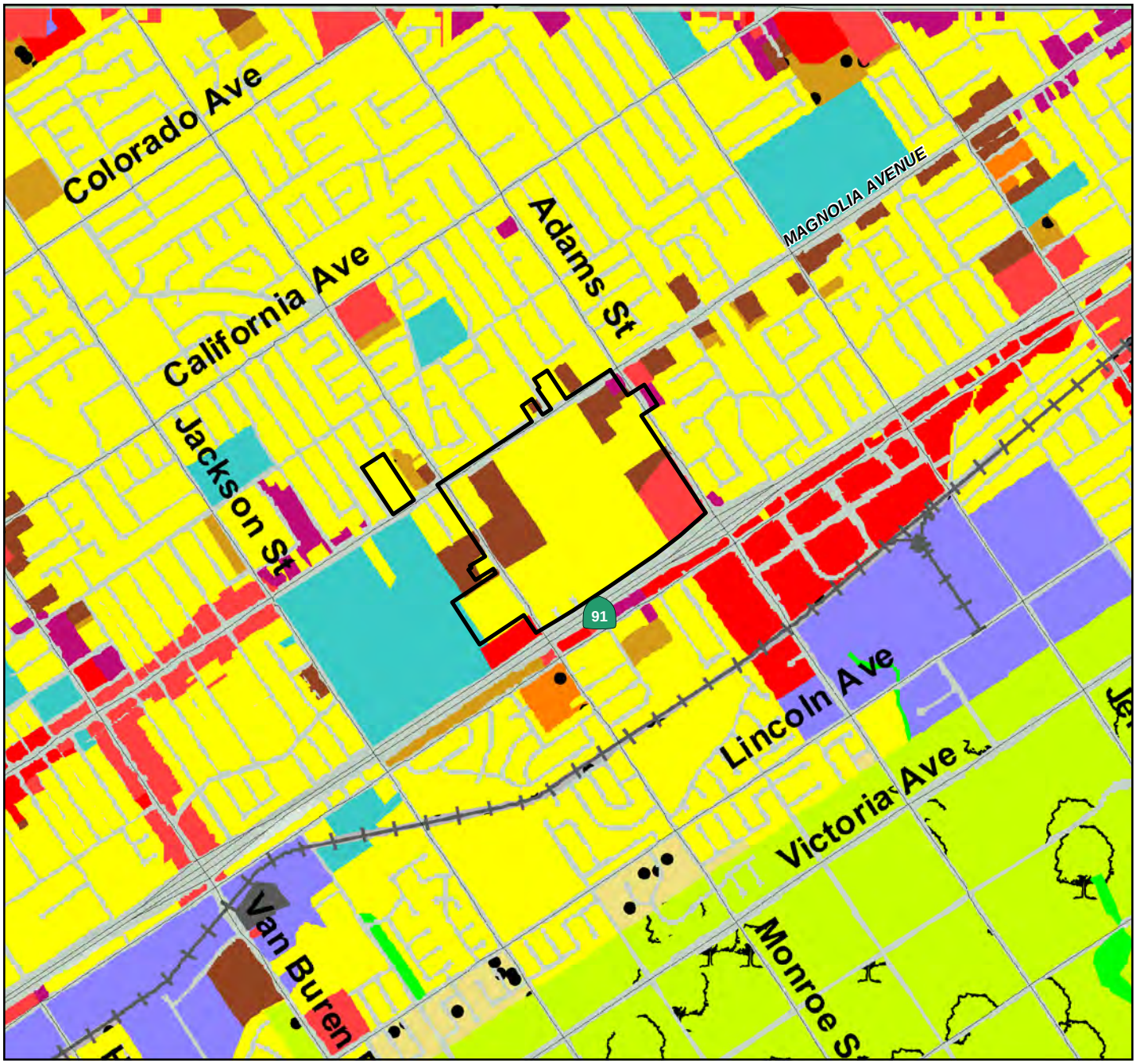
SOURCE: USGS 7.5' Quad: Riverside West (1980), CA; Riverside County, 2014

I:\CTR1501\Reports\EIR\fig2-2_GPLU.mxd (8/20/2018)

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Existing General Plan Land Use Designations for the CBUSP Planning Area and Surrounding Areas

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

FIGURE 2-3

CBU Specific Plan Zone

Residential Zones
- RA-5
- R-1-10500
- R-1-8500
- R-1-7000
- R-3-4-000
- R-3-3000
- R-3-2500
- R-3-2000
- R-3-1500

Commercial/Industrial Zones
- O
- CR
- CC
- BMP
- I

Other Zones
- PF

Overlay Zones
- WC

N

0 1000 2000
FEET

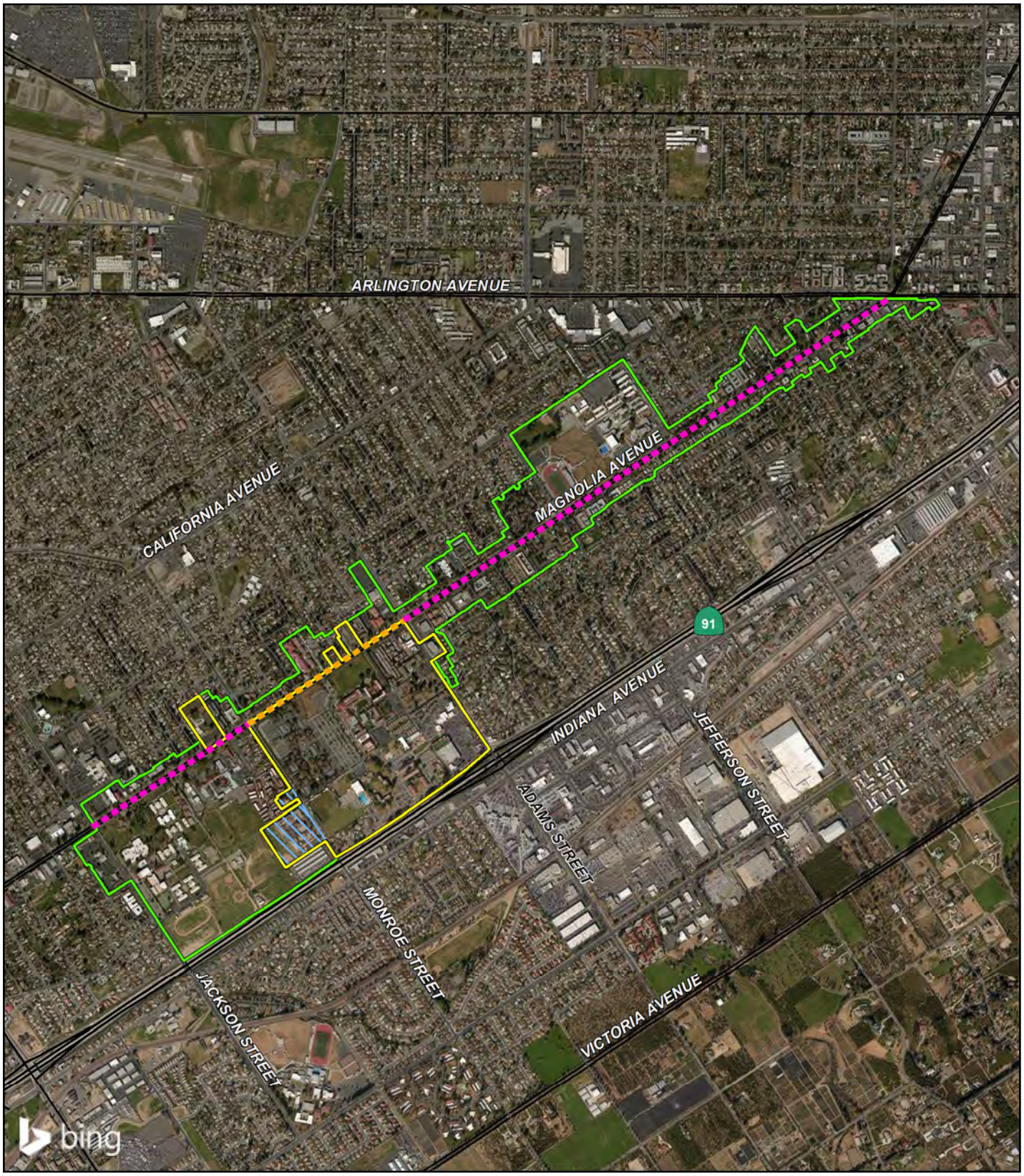
SOURCE: USGS 7.5' Quad: Riverside West (1980), CA; Riverside County, 2014

I:\CTR1501\Reports\EIR\fig2-3_Zoning.mxd (8/8/2018)

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Existing Zoning for the CBUSP Planning Area and Surrounding Areas

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

CBUSP Planning Area

Magnolia Specific Plan (Magnolia Heritage District)

To be Removed from Magnolia SP and Administered by CBUSP

132-foot Arterial, Scenic Boulevard, to be Administered under CBUSP

132-foot Special Boulevard, to Remain under Magnolia Avenue SP

N

0 1000 2000

FEET

SOURCE: Bing Aerial, 2015.

FIGURE 2-4

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

CBU and Magnolia Avenue
SP Planning Areas

I:\CTR1501\Reports\EIR\fig2-4_CBU_and_Mag_SP_zones.mxd (8/8/2018)

THIS PAGE INTENTIONALLY LEFT BLANK

- Enhance and increase mobility on and off campus;
- Provide pedestrian amenities and consistent design quality;
- Focus on safety and security;
- Preserve and maintain significant cultural resources;
- Strengthen campus identity through high quality development and aesthetics;
- Foster economic development; and
- Streamline the entitlement process for individual development projects within the campus that are consistent with the goals, standards, and guidelines of this Specific Plan.

2.3.2 Project Objectives

The overall Project goal is to develop and expand university facilities and facilitate anticipated increases in student enrollment/population under a more urban-intensive model. The Project objectives and policies are as follows:[2]

Objective 1:	Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.

Policy 1.1: Pursue the development program and campus improvements described in this Specific Plan while maintaining the flexibility needed to accommodate evolving academic and student needs and dynamic growth.

Objective 2:	Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined herein.

[2] *California Baptist University Specific Plan Amendment No. 1*. Chapter 2, Section C. C. City of Riverside. Public Review Draft, August 2018.

Policy 2.2: Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus.

Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.

Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.

Policy 3.1: Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum.

Policy 3.2: Provide a variety of safe and secure housing opportunities for students, including through the conversion of existing apartment units to student housing.

Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.

Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.

Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.

Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.

Policy 4.1: Ensure consistency with City of Riverside street standards, as may be modified, regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus.

Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus.

Policy 4.3: Accommodate the University's parking demand by providing parking in accordance with this Specific Plan.

Policy 4.4: Pursue the vacation of Diana Avenue to provide reasonable control over the access and vehicle speed along this southern campus edge.

Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission.

Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 3-3.

Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in this Specific Plan.

Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in this Specific Plan.

Policy 5.4: Establish a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.

Objective 6: Encourage environmentally sustainable development and operational practices.

Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside building code requirements.

Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals.

Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements.

Policy 6.4: Implement sustainability measures that complement and support the *City of Riverside Green Action Plan*.

Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside,

while highlighting the significance of the campus to the community.

Policy 7.1: Provide opportunities for University/City partnerships for programming of events on campus.

Policy 7.2: Maintain an open-door policy for the community to experience cultural events, competitive sports, conferencing, and other events on campus.

Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research.

Policy 8.1: Strive towards seamless access to information, resources, and services by creating and maintaining a vanguard converged network infrastructure supporting voice, video, and data.

Policy 8.2: Enhance student and faculty access by providing campus-wide wireless coverage.

Policy 8.3: Enrich student experience by leveraging technologies to improve operational efficiencies.

Policy 8.4: Stay abreast of emerging technologies by participating and partnering with relevant organizations in this ever-changing landscape.

2.3.3 Proposed Project

The proposed Project is designed to create a framework to guide development of campus boundary and facility expansions in order to facilitate the projected student enrollment in 2025 and provide a revised approach to regulate land use and development within the proposed CBUSP Planning Area to facilitate a transition from the current suburban model to a more urban-style campus.

Implementation of the proposed project will require the approval of the following entitlements:

The CBUSP Amendment establishes a CBUSP Zone to regulate land uses for the entire CBU campus. The CBUSP Zone includes two subareas, CBU SP-1 (Subarea 1) and CBU SP-2 (Subarea 2). They are intended to regulate density, building height, and setbacks throughout the campus. CBU SP-1 consists of approximately 147.25 acres developed with the original campus core, generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street. CBU SP-2 consists of approximately

19.75 acres outside of the original campus core and encompasses the six properties to the north, east, and west across Magnolia Avenue, Adams Street, and Monroe Street.

The uses adjacent to the proposed Project site are a mixture of single-family and multi-family residential, church, and convalescent uses to the north; single-family residential, retail, and office uses to the east; and single-family and multi-family residential, commercial and school uses to the west. State Route (SR) 91 is located to the south. General commercial uses are located further south beyond SR-91, including car dealerships.

2.3.3.1 CBU Land Use [Specific] Plan Amendment

The CBUSP Amendment proposes a single zoning district defined as the CBU Specific Plan Zone to encompass the approximately 156.4-acre current CBUSP Planning Area and approximately 10.6 acres encompassing two properties on the west side of Monroe Street owned and operated by CBU. Two subareas are defined, CBU SP-1 and CBU SP-2 (Figure 1-2). CBU SP-1 encompasses the 147.25 acre original campus core generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street. CBU SP-2 encompasses the six additional properties along the north frontage of Magnolia Avenue, the west frontage of Monroe Street, and the east frontage of Adams Street. Subareas 1 and 2 permit similar land uses, but provide different building height, density, and setback regulations in recognition of the different planning context each presents.

Development within the proposed CBU Specific Plan Zone will be subject to specific greenway buffers, setbacks, building heights, massing, and design requirements. Any future development on the CBU Specific Plan Zone will be subject to the standards, goals, and policies of the CBUSP, as amended, and in accordance with the mitigation measures specified in this Draft EIR.

Table 2.C identifies the primary and supportive uses allowed within the CBU Specific Plan Zone. These uses and all similar uses that are directly related to the operations of the University are permitted as a matter of right unless otherwise indicated in Table 2.C, subject to compliance with the development standards and design guidelines contained within the proposed CBUSP Amendment. All development permitted as a matter of right or conditionally permitted shall be subject to the requirements and processes established in CBUSP Chapter 8 Implementation.

In addition to uses associated with the University, temporary uses not operated by the University may be permitted to occur without any additional authorization, except for outdoor event if more than 2,500 attendees are expected. A Temporary Use Permit shall be obtain, pursuant to RMC Section 19.740 (Temporary Use Permit), for a temporary use or activity that requires an electrical permit, health permit, and/or fire permit.

Table 2.C
CBU Specific Plan Zone – Permitted Uses and Supportive Uses

Use Category P = Permitted by Right MCUP = Minor Conditional Use Permit CUP = Conditional Use Permit	CBU SP-1	CBU SP-2
Primary Uses		
Administrative Facilities	P	P
Amphitheaters, Performing Art Theaters, and Events Centers		
- Up to 2,499 seats	P	CUP
- 2,500 seats or more	MCUP	CUP
Athletic Facilities		
- Indoor	P	MCUP
- Outdoor	P	CUP
Aviation Instructional Facilities (classroom, simulators, and technology)	P	P
Bookstore/Gift Shop	P	P
Caretaker and Faculty Housing	P	P
Classrooms	P	P
Conference Facilities	P	P
Counseling Services	P	P
Dormitories/Student Housing	P	MCUP
Healthcare and Wellness Services	P	P
Laboratories and Research Facilities	P	P
Libraries	P	P
Maintenance Facilities (only associated with CBU operations)	P	MCUP
Museums and Galleries	P	P
Recreation Centers	P	P
Religious Facilities (related to CBU)	P	MCUP
Restaurant and Food Services (no drive-thru), and Retail Uses supporting campus activities	P	CUP
Single-family Residences	P	P
Storage Facilities - Stand-alone or Incidental to Primary Use		
- Incidental to the main campus	P	CUP
- Stand alone	P	PCUP
Supportive Uses		
Central Plant Expansion for heating, cooling, and similar functions for on-campus buildings (applies to upgrades to existing Central Plant and any new facility)	P	CUP
Monumentation and Signage	P	P
Open Space, Recreation Areas (casual), Courtyards and Plazas	P	P
Parking Facilities - Surface	P	P
Parking Facilities - Structured	MCUP	NP
Public Utilities and storm water management	P	P
Solar Power Generating Facilities		
- Rooftop Photovoltaic	P	P
- Solar Arrays	MCUP	MCUP

Table 2.C
CBU Specific Plan Zone – Permitted Uses and Supportive Uses

Use Category P = Permitted by Right MCUP = Minor Conditional Use Permit CUP = Conditional Use Permit	CBU SP-1	CBU SP-2
Wireless Communications Facilities	As set forth in RMC Chapter 19.530	As set forth in RMC Chapter 19.530
Rental, leasing, or other use of buildings, grounds, or recreational facilities for non-University affiliated events and activities.		
- Indoor Events	P	P
- Outdoor Events		
For events with 2,499 or fewer attendees	P	TUP
For events with more than 2,500 attendees	TUP	TUP

The proposed CBUSP Amendment establishes land use regulations, development standards, and design guidelines for development within the CBU Specific Plan Zone. The intent is to provide specificity with regard to permitted uses and expectations for the design and construction of new buildings and parking facilities, development and use of open spaces, internal roadway and other circulation improvements, lighting, landscaping, and the treatment of campus edge conditions. Subsequent development and improvement projects consistent with the CBUSP can be approved via an administrative entitlement process or by the Community and Economic Development Director, as outlined in the proposed CBUSP as amended, Chapter 6: Implementation.

2.3.3.2 Student Population

For the year 2025, the University has a total student enrollment goal of 12,000 students, an approximate 30 percent increase from the 2015 student population (Table 2.D).

Table 2.D
Student Population Projections

Year	Traditional Students	Graduate Students	Online Students	Intensive English Students	Total Enrollment
2015	5,201	1,268	1,921	24	**8,414**
2020	6,201	1,543	2,421	44	**10,209**
2025	7,201	1,813	2,921	65	**12,000**

The projected student population produces a number of challenges that CBU must address in the future. These include—but are not limited to—providing a sufficient level of academic and administrative facilities, student housing, parking, and student recreation amenities.

2.3.3.3 Student Housing

As previously stated, the University's student population consists of four student categories: traditional students, graduate students, online students, and intensive English students. Additionally, every student enrolled at CBU must live on campus until he or she is 21 years of age or if he or she receives a specified level of financial aid. This University policy combined with anticipated increases in student enrollment has resulted in the need to develop additional student housing. As shown in Table 2.B, student bed capacity in 2015 was 2,867 beds. The University's goal is to provide a bed-to-student ratio of 0.55 for traditional and graduate students. In 2025, the University anticipates that 3,961 beds would be needed to reach the proposed bed-to-student ratio (Table 2.E).

Table 2.E
Projected Student Housing Profile

Year	Traditional & Graduate Student Enrollment	Demand for Beds
2015	5,201	2,964
2020	6,201	3,411
2025	7,201	3,961

The University will provide additional housing as needed over time largely through acquisition of off-site residential properties. Acquisition of such properties would require a subsequent amendment to the CBUSP, and for that reason is not a part of the proposed Project.

2.3.3.4 Buildings and Facilities

In 2015, CBU provided 815,114 square feet of building area for academic purposes with another 100,000 square feet under construction in accordance with the 2013 CBUSP. In order to accommodate the anticipated 30 percent increase in student enrollment by 2025, the University anticipates providing an additional 400,000 square feet of building area for academic, recreational, and student housing purposes and 805,000 square feet of parking structures (Table 2.F). Additionally, new and reconfigured parking, housing, administrative support, athletic, and other facilities will be required within the CBU Specific Plan Zone.

Table 2.F
CBU Academic/Administrative Facility Capacity*

Facility	Square Footage
Academic/Recreation/Student Housing	400,000
Parking Structure with Office Space	805,000

* Projected construction through 2025

2.3.3.5 Circulation

The CBUSP Planning Area is generally bounded by Monroe Street to the west, Magnolia Avenue to the north, Adams Street to the east, and Diana Avenue and State Route 91 to the south. Existing circulation within the CBU campus core is shown in Figure 2-5.

Future circulation envisioned by Year 2025 within the original campus core has been organized via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes (Figure 2-6). Bicycle circulation will continue to share these routes. The original main entry from Magnolia Avenue will continue to provide key access to the campus core.

As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic on the local road network.

Monroe Street between Magnolia Avenue and Indiana Avenue is designated as an 88-foot Arterial in the City's General Plan. The University will coordinate with the City to implement detailed street plans to facilitate pedestrian crossing of Monroe Street to the campus core.

The General Plan designates Magnolia Avenue as a 120-foot Arterial, Scenic Boulevard, Parkway, and Special Boulevard. The section between Adams Street and Monroe Street is designated as a 132-foot Special Boulevard in the General Plan and the *Magnolia Avenue Specific Plan* (Magnolia Avenue SP) (Figure 2-3). The prescribed street width and treatment for Magnolia Avenue within boundaries of this Specific Plan will be implemented by the University in coordination with the Public Works Department.

The General Plan designates Adams Street between Magnolia Avenue and the SR-91 freeway as a 110-foot Major Arterial. A modified design for Adams Street is planned to address the location of existing buildings with variable setbacks along the street. The modified street sections have been designed to accommodate traffic volumes at full implementation of this Specific Plan Amendment and build-out of the General Plan. Some sections of Adams Street may exceed the 110-foot Major Arterial geometrics.

Diana Avenue between Adams Street and Monroe Street, and adjacent to SR-91, is a local 40-foot-wide (curb to curb) public street and will remain as such. The University may pursue traffic calming improvements on Diana Avenue. Any such pursuit will comply with the requirements of the City of Riverside's Neighborhood Traffic Management program. It is the University's ultimate goal to have Diana Avenue vacated. Any such consideration will require a formal

THIS PAGE INTENTIONALLY LEFT BLANK

LSA

FIGURE 2-5

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Existing External and Internal Roadways 2016

SOURCE: *California Baptist University Specific Plan, Public Review Draft*, City of Riverside, July 2018.
I:\CTR1501\Reports\EIR\fig2-5_ExistingExternal+Internal Roadways2016_08-13-2018.psd

THIS PAGE INTENTIONALLY LEFT BLANK

LSA

FIGURE 2-6

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Year 2025 External and Internal Roadways

SOURCE: *California Baptist University Specific Plan, Public Review Draft*, City of Riverside, July 2018.
I:\CTR1501\Reports\EIR\fig2-6_Year2025External+InternalRoadways_08-13-2018.psd

THIS PAGE INTENTIONALLY LEFT BLANK

request to the City and compliance with any requirements in place at the time of such request. No time frame has been established for the vacation of Diana Avenue.

Within the campus core are planned improvements to primary vehicular roads (Campus Drive/Lancer Lane) and secondary vehicular roads in order to improve overall driver and pedestrian circulation and retain a residential scale and quality regardless of the campus use served. Additionally, gated emergency vehicle access roads will be provided at multiple points from Magnolia Avenue, Adams Street, and Monroe Street and from the internal primary and secondary roadways. These roads will serve the dual purpose of pedestrian promenades and connections to academic buildings and interior courtyards, residential areas, athletic facilities, and open space areas. Emergency vehicle access roads will prohibit parking and comply with the California Fire Code and all City codes and regulations.

An internal, on-campus bus service system is planned to be implemented to serve CBU students and employees, with bus stops proposed along Lancer Lane within the campus core. This system will enhance the convenience of using bus service while avoiding potential traffic conflicts on Magnolia Avenue and Indiana Avenue.

The proposed Specific Plan Amendment provides for an improved campus bicycle, skateboard, and non-motorized scooter pathway system linked with the City system. With the anticipated growth of the campus, CBU will incorporate safe bicycle access and secured bicycle parking to create a bicycle-friendly campus. All primary and secondary roadways with the CBU campus will continue to permit cyclists either on shared facilities with cars or on dedicated bicycle lanes. Cyclists will also continue to be able to use the wider pedestrian paths and emergency vehicle access lanes. The University will implement multiple improvements over time, including appropriate lighting on roadways and pathways, signage, identification of bicycle pathways on campus directories, pavement markings on travel paths, and parking facilities, to improve conditions for and encourage cycling (as well as skateboarding, scootering, and similar mobility modes).

Pedestrian circulation consists of a network of internal pathways throughout the CBU campus. Sidewalks on both sides of the primary roadway have a minimum width of eight feet. Sidewalks provided on one or both sides of secondary roadways and through residential areas are six to eight feet wide. Primary sidewalks between academic buildings, courtyards, athletic facilities, and open spaces have a minimum width of 10 feet. Pedestrian level lighting will be provided on all walkways to eliminate poorly-lighted areas. Call boxes will be located at key points near parking lots, parking structures, residential areas, and throughout the campus. Finally, planting adjacent to walkways will be maintained at a reasonable height to ensure the safety and security of pedestrians.

Pedestrian connections will be provided between the parking facilities and the larger on-campus pedestrian circulation system. Where feasible, existing parking lots will be consolidated within the main campus for efficiency, and parking structures will be constructed to allow for greater parking density at central locations. At no time will the amount of available parking fall below the demand associated with current enrollment. Parking lots and structures may be located anywhere within the campus, provided parking lot and structure design conforms to the standards of the proposed CBU Specific Plan Amendment. Additionally, permanent parking to serve on-campus uses may be located off campus to meet CBU's parking requirements, consistent with the regulations set forth in Table 2.C. The University shall prepare an audit of parking demand and available parking every two years. The audit will be submitted to the Riverside City Planning Division to review and file. Should substantial parking deficiencies emerge, adjustments may be required to campus operations or physical changes to parking facilities to provide needed parking.

2.3.3.6 Open Space

The University owns several residential apartment complexes that this Specific Plan allows to transition to more traditional student residences. As part of such conversion, internal open space areas and balconies may be modified to reflect a development character more suitable to student life. Any loss of focused open spaces within the residential complexes would be offset by students' access to the common open space on the campus, which will be developed and improved in accordance with the landscaping requirements of the proposed Specific Plan Amendment (Figure 2-7). Specific landscape plans will be reviewed at the time of Site Plan and Design Review (as applicable) and shall be consistent with the Open Space Guidelines of the proposed Specific Plan Amendment.

The University's intent is to enhance campus views as the campus expands. Key features will include dense, attractive landscaping, uniform high-quality fencing materials, strong architectural design, a comprehensive sign program, and attractive campus gateways. The perimeter of the campus will have a formalized landscape treatment that unifies the contiguous campus boundaries. The treatment will vary to accommodate existing structures and planned development. Where no existing or planned open space facilities are provided, the buffer will be consistent with the greenway buffers described for each of the boundary roadways (Magnolia Avenue, Adams Street, and Monroe Street). A landscaped buffer treatment will be provided around all parking structures to soften the impact of the structure. Landscaped treatments within parking lots will include islands and tree wells to ease vehicular and pedestrian circulation and to provide shade. Finally, the landscape treatment along Magnolia Avenue will be compatible with the Magnolia Avenue Specific Plan and has already been established along Magnolia Avenue.

LSA

FIGURE 2-7

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Planned Open Space Network

SOURCE: *California Baptist University Specific Plan, Public Review Draft*, City of Riverside, July 2018.
I:\CTR1501\Reports\EIR\fig2-7_PlannedOpenSpaceNetwork_08-13-2018.psd

THIS PAGE INTENTIONALLY LEFT BLANK

Athletic open space shall provide for athletic fields appropriate to the competitive division of college athletics with which CBU is affiliated. Various upgrades to athletic facilities will be required to accommodate an increase in the number of spectators at sporting events, as well as satisfy NCAA Division II standards.

2.3.3.7 Cultural Resources

The University boasts National, State, and Local register-eligible cultural resources. The CBUSP Amendment provides an inventory of CBU properties surveyed for historical significance and prescribes treatment measures for any modifications, alterations, and/or improvements to Historical Resources in accordance with CEQA. Implementation of the proposed CBUSP Amendment, is intended to respect the historic context of cultural resources and not erode, degrade, or diminish the individual qualities and defining characteristics of any cultural resource in the Specific Plan area and surrounding neighborhoods, including the Magnolia Heritage District.

Any reconstruction or reuse of historic buildings or structures defined as Historical Resources pursuant to CEQA (§15064.5) or that are designated or eligible for designation in accordance with the criteria set forth in Title 20 (Cultural Resources) of the RMC will require a Certificate of Appropriateness. The Certificate of Appropriateness process is intended to ensure that the historic integrity of these properties is maintained whenever exterior improvements are made. As part of the process, impacts to Historical Resources are addressed in accordance with CEQA requirements.

2.3.3.8 Infrastructure

To meet the growth needs of the University and supply all planned facilities, improvements to the internal campus water system will be required. An eight-inch water line will be extended from Lancer Lane along the realignment of the primary access roadway (Campus Bridge Drive) to the existing water system in Adams Street to provide a loop system. This will occur during the construction of Lancer Lane. Local service connections to the buildings proposed to be constructed as part of the campus expansion will branch off the existing or proposed water line mains. Fire flow calculations will be required during final design for each building to ensure adequate protection. Final water line sizes will be determined at final building design during the plan check review process.

CBU owns and operates an on-site well used for irrigation purposes only. The existing well is equipped with a 60-horsepower pump with an approximate maximum capacity of 265 gpm. The size of the irrigation system pipes range from 0.5 to 6 inches in diameter. A second well will be installed on Lancer Lane to supplement the existing on-site well and help provide sufficient

irrigation water for the expanded landscape areas. With regard to use of reclaimed water, the University will consider connecting to the City of Riverside's reclaimed water infrastructure where appropriate. Additionally, the proposed CBUSP Amendment includes strategies to reduce water demand over the long term.

Wastewater is treated at the Riverside Regional Water Quality Control Plant located south of the Santa Ana River near Acorn Street. The plant has a design capacity of 52.2 million gallons per day, and an additional demand of nine million gallons per day is projected through the year 2025. Access and capacity fees will be charged by the City Public Works Department during implementation of the proposed CBUSP Amendment in order to fund additional capacity for the treatment plant.

The land use changes proposed by the CBUSP Amendment will create additional demand on sewer facilities surrounding the CBU Specific Plan Zone. Engineering studies prepared for the CBUSP Amendment determined the existing eight-inch sewer in Magnolia Avenue does not have capacity to serve the entire future development of the campus. Therefore, flows will be directed to existing sewer lines in Adams Street, Diana Avenue, and Monroe Street to relieve flows directed to the existing eight-inch sewer line on Magnolia Avenue. A 10-inch sewer connection is planned to connect with the existing 12-inch sewer line in Monroe Street. In 2014, a previously planned eight-inch sewer line was extended northeasterly along the proposed primary access road to Adams Street. The recently contructed Events Center is served by the existing eight-inch sewer line in Diana Avenue. Due to the configuration of the Events Center, a sewer pump was installed to drain the wastewater to the existing eight-inch line.

The campus is divided into four drainage areas due to the terrain and configuration of established storm drain facilities. These areas drain into regional storm drain facilities managed by the Riverside County Flood Control and Water Conservation District (District). The CBU campus is located within the Monroe Area, as indicated in the District's *Master Drainage Plan Existing and Proposed Storm Drain Facilities*. Three mainline drainage facilities serve the area:

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

According to engineering studies for the campus master plan, the Monroe Storm Drain Stage I Line has adequate capacity to accommodate all storm water flows associated with the CBU campus, as the onsite basin will be enhanced to capture and detain increased runoff to keep the outflow at or below existing storm flows.

University-owned storm drain facilities on the campus range in size from six to 42 inches. As new development occurs, localized storm drains will be constructed and connected to existing storm drain systems that flow to the basin. Existing drainage patterns will be respected throughout the campus to reduce the potential of diversion of flows. The existing 30-inch storm drain along Lancer Lane will be extended to provide drainage facilities for the realigned primary vehicular roadway.

To reduce flows to the regional storm drain system and capture drainage for beneficial reuse, features will be integrated in all new campus development to promote infiltration. Foremost, the existing detention basin will be redesigned to retain runoff and allow for its treatment to attain applicable water quality standards for the region and allow for some infiltration into the local aquifer. The outlet structure will be designed to detain the storm water runoff down to pre-Project conditions. The outlet structure will connect to the existing 30-inch storm drain in Magnolia Avenue and drain to the existing Monroe Street Channel.

Electrical service is provided by the City of Riverside through the Riverside Public Utilities Department, and natural gas service is provided by the Southern California Gas Company. The campus will have no unusual power or natural gas demands or service needs as build out occurs pursuant to the proposed CBUSP Amendment. The additional demand on electrical and natural gas facilities created will be reviewed and approved by the City and by the Gas Company, respectively, as individual projects are proposed. Any needed improvements to the larger City or gas provision systems over time will be funded through fees collected for each new development.

Solid waste collection and disposal are provided by private contractors. The University will continue to contract privately to meet its waste disposal needs and to ensure it complies with all regulations regarding waste diversion (recycling).

Telecommunications systems are provided to CBU by franchised service providers through contracts with the City. The University will have choices regarding which service providers are used and will coordinate any localized upgrade needs with the selected provider using a technology convergence model to build new infrastructures and help create environments and conditions that allow for the cultivation of creative and innovative ideas from students, faculty, staff, and visitors utilizing technology.

A centralized heating and cooling facility known as the Central Plant serves the core academic and administrative areas of the CBU campus. An expansion of the physical plant will be required in the future to meet anticipated needs of the campus's physical environment in addition to those facilities. The proposed CBUSP Amendment allows for such expansion, as well as the establishment of any new such facility as required to meet campus needs, in accordance with

Title V stationary source air pollution control rules and regulations administered by the South Coast Air Quality Management District.

2.3.3.9 Project Design Features and Construction Measures

CBU has incorporated Project design features and construction measures into the Project to reduce the potential for environmental effects. Construction will be performed by qualified contractors, and construction documents, plans, and specifications will incorporate stipulations regarding standard construction requirements and industry acceptable construction practices including, but not limited to traffic control during construction activities, noise, water quality protection, soil and sedimentation control, and construction-related solid waste. The proposed construction activities will be conducted in accordance with the RMC and other applicable requirements. These requirements are included in Table 2.G, Summary of Project Design Features and Construction Measures, and referenced throughout the impact discussions in Sections 4.1–4.18 of the Draft EIR.

Table 2.G
Summary of Project Design Features and Construction Measures

Subject Area	Construction Measure
Traffic control during construction activities	The applicant shall prepare a traffic control plan that will specifically address construction traffic and possible lane closures within the City's public rights-of-way. The traffic control plan shall be prepared and approved by the City prior to issuance of a demolition, grading, or building permit. The traffic control plan will include provisions for construction times and control plans for allowance of motorists, bicyclists, pedestrians, and bus access throughout construction. This traffic control plan will also include provisions to ensure emergency vehicle passage at all times, and will include signage and flagmen when necessary. The traffic control plan will include provisions for coordinating with local school hours and emergency service providers regarding construction times.
Noise	Construction activities shall occur Monday through Friday from 7:00 a.m.–7:00 p.m., on Saturdays from 8:00 a.m.–5:00 p.m., and shall not occur on state and federal holidays (in compliance with the City's Municipal Code, Section 7.35).
Water quality protection and erosion and sedimentation control	In compliance with the National Pollution Discharge Elimination System (NPDES), the applicant shall prepare a Storm Water Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) to be implemented during Project construction activities. The purpose of the SWPPP shall be to prevent construction-related pollutants from contacting storm water and to control erosion and sedimentation. The SWPPP will be prepared and submitted to the Regional Water Quality Control Board (RWQCB) for review and approval prior to the start of construction.
Construction-related solid waste	The Project applicant shall designate a solid waste management coordinator who will work with construction contractors to estimate quantities of each type of material that is to be salvaged, recycled, or disposed of as waste; oversee plans for separation of materials; and review procedures for periodic collection and transportation of materials.

2.4 DISCRETIONARY ACTIONS

Implementation of the proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions in order to strengthen the campus identity. Included in the CBUSP Amendment are design guidelines and elements to ensure an enduring, identifiable, and dynamic image for the CBU campus and the community as it transitions to an urban-style campus from the current suburban model. Although the Project does not propose a specific development project, it does propose a framework under which specific development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment.

Future development and improvements to the main CBU campus (Subarea-1) would entail 400,000 square feet of academic, recreation, and student housing facilities and 805,000 square feet of parking structure(s) with integrated office space. As future development and improvement projects, including improvements to or demolition of existing campus facilities, are proposed pursuant to the CBUSP, as amended, permits or other forms of approval from public agencies or other entities prior to construction would be required, as applicable to specific projects, prior to their construction. Various forms of approval are discussed in following Sections 2.4.1 through 2.4.4.

2.4.1 City of Riverside

The proposed Project requires amendments to several land use planning documents. First, the proposed Project includes a General Plan Amendment (City file no. P15-0989) to change the underlying General Plan land use designation for the Health Scienes Campus and Wellness Center from "Public Facilities/Institutional" to "CBU Specific Plan" (see Figure 2-2). Second, the proposed Project includes a Change of Zone request (City file no. P15-0987) to change the zoning on the CBUSP Planning Area to "CBU Specific Plan Zone" and a change of zone on the Health Scienes Campus and Wellness Center properties from R-1-7000 to CBU SP (see Figure 2-3). Third, the proposed Project includes two Specific Plan Amendments (City file nos P17-0543) to remove the Health Sciences Campus and Wellness Center from the *Magnolia Avenue Specific Plan* and to add these properties to the CBUSP. Lastly, the proposed Project requires certification of the EIR (Planning Case P15-0990).

2.4.2 Regional Water Quality Control Board, Santa Ana Region

A National Pollutant Discharge Elimination System (NPDES) Construction General Permit is required for grading activities of one acre or larger. Any development within the CBU Specific Plan Zone resulting in a disturbance of more than one acre of soil will require filing of a Notice of Intent with the Regional Water Quality Control Board, Santa Ana Region and acquisition of a

General Construction Activity Stormwater Permit pursuant to the NPDES regulations established under the Clean Water Act. This permit requires preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP), which is intended to prevent degradation of surface and ground waters during the grading and the demolition process.

2.4.3 South Coast Air Quality Management District

A fugitive dust control plan submitted to the South Coast Air Quality Management District for approval will be required prior to issuance of grading permits (SCAQMD Rule 403). A Title V stationary air pollution source permit will be required for future expansions or modifications to the Central Plant.

2.4.4 Riverside Municipal Airport Land Use Compatibility Plan

The Riverside County Airport Land Use Commission (RCALUC) has developed Land Use Compatibility Plans for each airport in the County of Riverside, including the Riverside Municipal Airport, which is located approximately two miles north of the CBU Specific Plan Zone. Portions of the CBU Specific Plan Zone lie within Zone D (Primary Traffic Patterns and Runway Buffer Area) and Zone E (Other Airport Environs) of the Land Use Compatibility Plan prepared for Riverside Municipal Airport,[3] as shown on Figure 4.8-1 in Chapter 4.8 of this Draft EIR. In Zone D, any development over 70 feet tall will be subject to airspace review by the RCALUC, and highly noise-sensitive outdoor nonresidential uses are prohibited. Additionally, children's schools, hospitals, and nursing homes are discouraged within Zone D. In Zone E, any development over 100 feet tall will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.

[3] *Riverside County Airport Land Use Compatibility Plan Policy Document.* Adopted by Riverside County Airport Land Use Commission. Adopted March 2005.

CHAPTER 3.0
ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

3.1 EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE EIR PROCESS

California Environmental Quality Act (CEQA) provides that an Environmental Impact Report (EIR) shall focus on the significant effects on the environment, discussing the effects with emphasis in proportion to their severity and probability of occurrence.

Section 21100 (c) of the Public Resources Code states that an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were, therefore, not discussed in detail in the Draft EIR (DEIR) (California Public Resources Code, Section 21000 et seq.). Section 15128 of the State CEQA Guidelines adds, "Such a statement may be contained in an attached copy of an Initial Study." Since an Initial Study was not prepared with the Notice of Preparation (NOP), the EIR evaluates all of the possible significant effects of the Project in accordance with Appendix G of the State *CEQA Guidelines*.

Chapter 4 of the DEIR concluded that the proposed Project will result in no impact, a less than significant impact, or a less than significant impact with the incorporation of mitigation measures to the following issue areas and thresholds as listed below. For those issue areas requiring mitigation to reduce the impact to less than significant, the specific mitigation measure has been cited.

Aesthetics

- Have a substantial adverse effect on a scenic vista;
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
- Substantially degrade the existing visual character or quality of the site and its surroundings; and;
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Agriculture and Forestry Resources

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract;

- Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g));

- Result in the loss of forest land or conversion of forest land to non-forest use; and

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Air Quality

- Conflict with or obstruct implementation of the applicable air quality plan;

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;

- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);

- Expose sensitive receptors to substantial pollutant concentrations; and

- Create objectionable odors affecting a substantial number of people.

Biological Resources

- Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service (MM BIO-1);

- Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service;

- Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;

- Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (MM BIO-2); and

- Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Cultural Resources

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 (MM CUL-1, CUL-2);

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 (MM CUL-3, CUL-4, CUL-5);

- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (MM CUL-6); and

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

Geology and Soils

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault;

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking;

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction (MM GEO-1);

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides;

- Result in substantial soil erosion or the loss of topsoil;

- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse (MM GEO-1);

- Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property (MM GEO-1); and

- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water.

Greenhouse Gas Emissions

- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases; and

- Be consistent with the CARB Scoping Plan and regulations adopted for the purpose of reducing the emissions of greenhouse gases (MM GHG-1, GHG-2).

Hazards and Hazardous Materials

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;

- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment (MM HAZ-1, HAZ-2);

- Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school (MM HAZ-2);

- Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment (MM HAZ-1, HAZ-2);

- Be located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, and result in a safety hazard for people residing or working in the project area (MM HAZ-3);

- Be located in the vicinity of a private airstrip, and result in a safety hazard for people residing or working in the project area ;

- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and

- Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Hydrology and Water Quality

- Violate any water quality standards or waste discharge requirements;
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site;
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;
- Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;
- Otherwise substantially degrade water quality;
- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and
- Expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

Land Use and Planning

- Physically divide an established community;

- Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; and

- Conflict with any applicable habitat conservation plan or natural community conservation plan.

Mineral Resources

- Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and

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

Noise

- Exposure of Persons or Generation of Noise in Excess of Standards Established by the General Plan or Noise Ordinance (MM NOI-1, NOI-2, NOI-3, NOI-4);

- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels (MM NOI-5);

- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project (MM NOI-1, NOI-2, NOI-3, NOI-4);

- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project (MM NOI-1, NOI-2, NOI-3, NOI-4);

- Be located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels; and

- Be located within the vicinity of a private airstrip, and expose people residing or working in the project area to excessive noise levels.

Population and Housing

- Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);

- Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and

- Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Public Services

- Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives;

- Result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives;

- Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives;

- Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios; and

- Result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, need for new or physically altered public facilities, the construction of which could cause significant environmental impacts.

Recreation

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and

- Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Transportation/Traffic

- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- Result in inadequate emergency access; and
- Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance of such facilities.

Tribal Cultural Resources

- Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
    - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k) (MM CUL-1, CUL-2, CUL-3); and
    - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Utilities and System Services

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;
- Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;

- Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed;
- Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;
- Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and
- Comply with federal, state, and local statutes and regulations related to solid waste.

Energy Conservation

- Result in wasteful, inefficient, or unnecessary consumption of energy;
- Conflict with existing energy standards and regulations; and
- Place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity.

THIS PAGE INTENTIONALLY LEFT BLANK

CHAPTER 4.0
ENVIRONMENTAL IMPACT ANALYSIS

THIS PAGE INTENTIONALLY LEFT BLANK

4.1 AESTHETICS

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential impacts to scenic vistas, scenic resources, and visual character or quality, and potential impacts from light or glare associated with of the proposed Project. No written comments regarding aesthetics were received in response to the NOP.

For the purposes of the following analyses, three general aesthetic terms are defined: "scenic vistas," "viewsheds," and "visual character."

- **Scenic Vistas:** A scenic vista can be categorized as either containing a panoramic view[1] or a focal view. Panoramic views are typically associated with publicly-accessible vantage points that provide a sweeping geographic orientation not commonly available (e.g., skylines, valleys, mountain ranges, or large bodies of water). Focal views are typically associated with views of natural landforms, public art/signs, and visually important structures, such as historic buildings. Aesthetic components of a scenic vista include three components: scenic quality, sensitivity level, and view access.

- **Viewsheds:** A viewshed is typically defined as the natural environment that is visible from one or more viewing points. CEQA documents most often define viewshed as what portions of the Project viewers can see from surrounding areas. A viewshed can be divided into three distinct components: the foreground, midground, and background.

- **Visual Character:** The visual character of a site is defined by its physical characteristics, such as landform, vertical relief, type of vegetation, textures, and patterns; the presence of clear or cascading water; range of color in the soil, rock, vegetation, or water; variety in landscape; man-made structures visually different from the natural environment; and other visually distinguishing elements.

4.1.1 Setting

Although the majority of the City is urbanized, the hills and ridgelines that surround the City provide scenic vistas to residents where they can experience long distance views of natural terrain. Vista points can be found throughout the City, both as viewed from urban areas toward the hills and from wilderness areas toward the City. The most notable scenic vistas in the City include the La Sierra/Norco Hills, Sycamore Canyon Wilderness Park, and Box Springs

[1] A panoramic view consists of visual access to a large geographic area, for which the field of view can be wide and extend into the distance.

Mountain Regional Park. The peaks of Box Springs Mountain, as well as Mt. Rubidoux, Arlington Mountain, Alessandro Heights and the La Sierra/Norco Hills provide scenic views of the City and the region (GP 2025 FPEIR, p. 5.1-2). The higher elevation hills shape the visual outline of the City and drainage areas of the City provide a visual backdrop as viewed from streets, buildings, and open spaces.[2] The Project site contains visual obstructions such as landscaping, street trees, signs, and existing buildings which substantially limit views of these surrounding hills, ridgelines and scenic vistas. There are several designated scenic and special boulevards and parkways within the City. The nearest Scenic Boulevard, Parkway, and Special Boulevard to the Project site is Magnolia Avenue, a tree-lined 120 foot arterial street on the north side of the CBU campus (GP 2025, Figure CCM-4). The City's GP 2025 considers each parkway part of a network to establish linkages among Riverside's neighborhoods, major elements of its natural environment and neighborhood parks, and schools. No officially designated state scenic highways or eligible state scenic highways traverse the City (GP 2025 FPEIR, p. 5.1-4).

Existing Conditions

Visual Character of the Project Site. The CBU Specific Plan area contains an eclectic collection of property developed with single-family and multi-family residential, dormitories, churches, warehouses, offices, classrooms, a gymnasium, theater, fraternal hall, library, and open spaces of varying sizes and for a variety of purposes. The campus embodies distinctive characteristics of Mission Revival and Spanish-style architecture and also portrays a rich history of agriculture, public service, and education through various historic districts within the campus. The Neighbors of Woodcraft historic district includes the James Building, the Annie Gabriel Library, the Central Plant, and landscapes that include the Magnolia Lawn, Palm Drive, and Harden Square. The late 19th century Hawthorne House, and associated eucalyptus tree are designated as a City Landmark. The CBU historic district includes the Smith & Simmons [dormitory] Halls, the Van Dyne Field House Gymnasium, and the Wallace Book of Life [theatre] Building.

Visual Character of the Surrounding Area. Land uses surrounding the CBU Specific Plan area include single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; single-family and multi-family residential, commercial, and school uses to the west; and State Route 91 freeway, multi-family residential, church, school, and commercial uses to the south. The northern boundary of the CBU Specific Plan area is fronts onto Magnolia Avenue, a tree-lined arterial street established in 1876 as a major thoroughfare and designated as a Scenic Boulevard, Parkway, and Special Boulevard in the Circulation and Community Mobility Element of the

[2] City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report, Section 5.1 Aesthetics*, December 2007.

General Plan (GP) 2025.[3] The western and northern boundaries of the Subarea-1 (along Monroe Street and Magnolia Avenue) and the southern and eastern boundaries of Subarea-2 (along Magnolia Avenue and Adams Street) are surrounded by the Magnolia Heritage District of the *Magnolia Avenue Specific Plan* (Figure 2-4).

The Magnolia Heritage District is one of the two oldest communities, the other being Arlington Village, located along the original Magnolia corridor.[4] The CBU campus frontage along the Magnolia Heritage District consists of mixed use/academic, mixed use/residential, athletics, and open space. Properties within the Magnolia Heritage District and surrounding the CBU Campus consist primarily of schools, multi-family housing, some single-family housing, and commercial retail uses.

Light, Glare, and Shading Characteristic of the Project Site and Surrounding Area. The Project site is located in a built-up urban area where lighting is a common feature. Existing light sources within the Project site include security and operational lighting associated with the existing campus academic/administrative, residential, and athletic facilities, as well as lighting from walkways, parking lots, and internal streets on campus. Existing light sources in the surrounding area include streetlights, building lighting, illuminated signs, security lighting, sidewalk lighting, parking lot lighting, and headlights/tail lights from vehicles traveling on State Route 91 freeway, along Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street. Other light sources include single-family and multi-family residential, church, and convalescent uses to the north; single-family residential, retail, and office uses to the east; and single-family and multi-family residential, commercial, and school uses to the west.

Glare is the result of sharply reflected light caused by sunlight or artificial light reflecting from highly polished surfaces such as window glass or metallic surfaces, and the direct view of a bright, unshielded light source. Glare can be uncomfortable (discomfort glare) or disabling (disability glare). Glare decreases visibility; the level of receptors' sensitivity to glare can vary widely. There is no substantial glare occurring in the Project area.

[3] Circulation and Community Mobility Element, *Riverside General Plan 2025.* Figures CCM-4 and 5.1-1, Tables 5.1-A and 5.1-B. City of Riverside. November 2007, Amended November 2012.

[4] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. Adopted November 10, 2009.

4.1.2 Related Regulations

Federal Regulations

There are no federal regulations regarding aesthetics that are applicable to the proposed Project.

State Regulations

California Scenic Highway Program. The California Scenic Highway Program was established in 1963 to "preserve and protect scenic highway corridors from change which would diminish any aesthetic value of lands adjacent to highways." The state laws governing the scenic highway program are found in the California Streets and Highways Code Section 260 et seq. The California Scenic Highway System includes a list of highways that either have already been designated as scenic highways or that are eligible for designation as scenic highways. No state-designated or eligible scenic highways exist within or near the Project site.

Local Regulations

Mount Palomar Lighting Policy Area. The Palomar Observatory is located on Palomar Mountain in north San Diego County. The continued urbanization of the areas surrounding this observatory, including southwestern Riverside County, contributes to reducing the nighttime usefulness of this facility due to lighting from streetlights, automobiles, residences, and businesses. In order for the night sky to be viewed clearly for astronomical research purposes from this observatory, unique nighttime lighting standards are required for development within the Mount Palomar Lighting Policy Area. The Mount Palomar Lighting Policy Area consists of two zones; Zone A, which includes property within a 15-mile radius of the observatory, and Zone B, which includes property within a 45-mile radius of the observatory. Because the Project site is more than 45 miles north of the observatory, it is not within the Mount Palomar Lighting Policy Area.

Riverside General Plan 2025. The following objectives and policies pertaining to aesthetics are drawn from the City's *General Plan 2025* and are applicable to the proposed Project. Although listed here, each of these objectives and policies are also presented in Table 4.10-1 of the Land Use and Planning Section of the EIR with an evaluation of the Project's consistency with the stated objectives and policies.

<u>Land Use Objectives and Policies</u>

Objective LU-11 Create a network of parkways to establish stronger linkages between Riverside's neighborhoods, major elements of its natural environment and neighborhood parks and schools, and.

Policy LU-11.1	Recognize parkways as distinctive elements of the City's circulation network.
Policy LU-11.3	Seek opportunities to provide enhanced bicycle and pedestrian usage along parkways through the development process.
Objective LU-12	Restore the Magnolia/Market Corridor to its historical role as a scenic "showcase roadway" that spans the City of Riverside, while updating its function as a key transit corridor to support future growth.
Policy LU-12.1	Through the Specific Plan process, further implement the earlier Polizoides Plan for the corridor, identify appropriate land uses, development opportunities and streetscape improvements along the Corridor that support the vision as a scenic roadway with distinct districts. Reinforce the desired land uses within the context of each district through development provisions and regulations.
Policy LU-12.2	Maintain the existing mature heritage landscaping and infill landscaping as appropriate to return the Corridor to being a grand tree-lined parkway.
Objective LU-78	Maintain Ramona's established residential character while allowing for higher-intensity, transit-oriented residential and mixed residential-commercial development on opportunity sites, particularly along Magnolia and California Avenues.
Policy LU-78.2	Preserve historic landscaping and increase green space along the Magnolia Corridor.

Open Space and Conservation Objectives and Policies

Objective OS-1	Preserve and expand open space areas and linkages throughout the City and its sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.
Policy OS-1.6	Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections.

Circulation and Community Mobility Element

Objective CCM-2	Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and

businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development.

Policy CCM-2.10 Emphasize the landscaping of parkways and boulevards.

CBUSP Amendment. Development of the CBU Campus and associated facilities is currently administered pursuant to the 2013 CBUSP, adopted March 26, 2013 under Resolution No. 22511 and Ordinance No. 7203 pursuant to specific objectives and policies designed to foster a positive relationship between CBU and the larger community in which it resides.[5] The proposed CBUSP Amendment will replace the 2013 CBUSP in its entirety to facilitate a more urban-style development schema, but the objectives and policies proposed in the CBUSP Amendment mirror those under which CBU development is currently administered.

Additionally, the proposed CBUSP Amendment will replace the *Citywide Design and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan* within the CBU Specific Plan Zone. Two properties west of Monroe Street (Assessors' Parcel Numbers 233-12-0010 and 233-11-0045) will be amended and removed out of the *Magnolia Avenue Specific Plan* and incorporated into the CBUSP Amendment as part of the proposed Project.

The following objectives and policies pertaining to aesthetics are drawn from the CBUSP Amendment and are applicable to the proposed Project.

Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined in the CBU Specific Plan, as amended.

Policy 2.2: Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus.

Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.

[5] *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. Pages 1, 27, and 29. City of Riverside. Adopted March 26, 2013.

Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.

Policy 3.1: Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum.

Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.

Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.

Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, supportive services, and academic uses.

Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission.

Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 4-5 [of the CBUSP Amendment].

Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in the CBU Specific Plan, as amended.

Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in the CBU Specific Plan, as amended.

Policy 5.4: Establish a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.

Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.

Riverside Municipal Code

City of Riverside Title 17: Grading Code

All applications for a grading permit shall be accompanied by grading plans, including an interim erosion control plan, preliminary soils report prepared by a registered soils engineer

(Geotechnical engineer), payment of a grading plan review fee as specified in the current Fees and Charges Resolution, as well as a National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges associated with construction activities that includes clearing, grading or excavation that results in the disturbance of at least one acre. In addition, documentation of New Development Best Management Practices (BMPs) is required by the Riverside County Drainage Area Management Plan to identify and control post-construction/discharge of pollutants to the Waters of the United States.

City of Riverside Title 19: Zoning Code

Chapter 19.710 Design Review

The City of Riverside design review procedures are necessary to preserve and promote the health, safety, and general welfare of the community by protecting and preserving the value of properties and encouraging high quality development; recognizing the interdependence of land values and aesthetics and providing a method to implement this interdependence in order to maintain the values of surrounding properties and improvements; ensuring that the public benefits derived from expenditures of public funds for improvement and beautification of streets and public facilities shall be protected by the exercise of reasonable controls over the character and design of private buildings, structures, and open spaces; ensuring the maintenance of high design standards in the vicinity of public buildings and grounds for the preservation of the architecture and general appearance in the areas of the City containing the buildings and grounds and to preserve the property values in the area; promoting maintenance of high design standards adjoining thoroughfares of Citywide importance to ensure that the community benefits from the natural growth and vegetation as much as possible; and ensuring design of landscaping and vegetation. In addition, the Design and Reviews procedures established by this Chapter shall be applied according to, and in compliance with, the following standards, if applicable:

1. Sites shall be graded and developed with due regard for the aesthetic qualities of the natural terrain and landscape, and trees and shrubs shall not be indiscriminately destroyed.

2. Buildings, structures, and signs shall be properly related to their sites and consistent with the character of the neighborhood and surrounding sites, and shall not be detrimental to the orderly and harmonious development of their surroundings and the City.

3. Open spaces, parking areas, pedestrian walks, signs, illumination, and landscaping (including water efficient irrigation facilities) shall be adequately related to the site and arranged to achieve a safe, efficient, and harmonious development.

4. Sites shall be developed to achieve a harmonious relationship with existing and proposed adjoining developments, avoiding both excessive variety and monotonous repetition, but allowing, when feasible, similarity of style or originality of decision.

5. When feasible, electrical and similar mechanical equipment, and trash and storage areas shall be effectively screened from public way. The use of harmonious or related colors and materials shall be encouraged.

6. The design review process shall endeavor to eliminate the ugly, the garnish, the inharmonious, the monotonous, and the hazardous, and shall endeavor to ensure that proposed improvements will not impact the desirability of investment or occupancy nearby; but originality in site planning, architecture, landscaping, and graphic design shall not be suppressed.

7. Review shall include exterior design, materials, textures, colors, means of illumination, signing, landscaping, and irrigation.

Chapter 19.556 (Lighting)

The following are the City's lighting design and development standards as established in Section 19.556.020 of the Municipal Code.

A. Lighting for safety purposes shall be provided at entryways, along walkways, between buildings, and within parking areas.

B. Lighting support structures shall not exceed the maximum permitted building height.

C. All on-site lighting shall provide an intensity of one foot-candle at ground level throughout the areas serving the public and used for parking.

D. Flickering or flashing lights shall not be permitted.

E. Light sources shall not be located in required buffer areas, except those required to illuminate pedestrian walkways.

F. All lights shall be directed, oriented, and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that would obstruct drivers' vision.

G. Light poles shall not exceed 20 feet in height, including the height of any concrete or other base material.

H. The City may require submittal of an exterior lighting plan as part of any development application or as a condition of approval of a project. (Ord. 6966 §1, 2007)

Section 19.590 Performance Standards

The following are the City's lighting and glare performance standards, as established in Section 19.590.070 of the City's Municipal Code (City of Riverside 2007b):

A. Lighting for safety purposes shall be provided at entryways, along walkways, between buildings, and within parking areas.

B. Except for stadium and playing field lighting, lighting support structures shall not exceed the maximum permitted building height of the zone where such lights are located. Furthermore, the height of any lighting shall be the minimum required to accomplish the purpose of the light. Freestanding pole lights shall not exceed a maximum height of fourteen feet within 50 feet of a residentially zoned property or residential use.

C. The candle-power of all lights shall be the minimum required to accomplish the purpose of the light.

D. Flickering, flashing, or strobe lights shall not be permitted. All lights shall be constant and shall not change intensity or color more often than once every 30 minutes.

E. Aircraft search lights normally used to draw attention to a business from off-site are prohibited.

F. Lighting where required for parking lots shall be provided at a level no less than one foot candle throughout the lot and access areas, and such lighting shall be certified as to its coverage, intensity, and adherence to Section 19.590.070 (Light and Glare) and Chapter 19.556 (Lighting) by a qualified lighting engineer.

G. All lights shall be directed, oriented, and shielded to prevent light from shining onto adjacent properties, onto public rights-of-way, and into driveway areas in a manner that will obstruct drivers' vision.

H. Lighting for advertising signs shall not cause light or glare on surrounding properties.

I. Lighting shall not be directed skyward or in a manner that interferes with the safe operation of aircraft.

4.1.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, the Project could have a significant impact on aesthetics if the proposed Project would:

- (Threshold A) Have a substantial adverse effect on a scenic vista;
- (Threshold B) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway;
- (Threshold C) Substantially degrade the existing visual character or quality of the site and its surroundings; and/or
- (Threshold D) Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area.

Methodology

Any evaluation of visual impacts is subjective; however, community aesthetic values can be used to evaluate changes in views within a particular community. These values are found in General [and Specific] Plan policies and zoning ordinances. Where specific policies are absent, general design theory and visual analysis methods can be incorporated to evaluate aesthetic impacts. For the purposes of CEQA compliance, this analysis of visual impacts will focus on changes in the visual character of the Project site that would result from implementation of the proposed CBUSP Amendment including the visual compatibility of on-site and adjacent uses, changes in vistas and viewsheds where visual changes would be evident, and the introduction of sources of light and glare. Impacts to the existing environment of the Project site are to be determined by the contrast between the site's visual setting before and after proposed implementation of the CBUSP Amendment. Although few standards exist to singularly define perceptions of aesthetic value, the degree of visual change can be measured and described in terms of visibility and visual contrast, dominance, and magnitude within an existing contextual framework.

4.1.4 Project Design Features

The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions in order to strengthen the campus identity. The land use regulations and development standards for the CBUSP Amendment provide CBU administration and CBU's contractors with the development and design criteria that apply to development governed by the Specific Plan, and to reinforce the desired building and distinct character of the Mission Revival and Spanish-style architectural influences. .

Specific Plan Amendment Design Elements

In accordance with these development standards, Chapter 5 of the CBUSP Amendment provides specific design elements to guide the architectural, landscape, site furnishings, campus streetscapes and medians, entrance and corner monumentation, fence and wall treatment, open space, lighting design, campus art, and sustainable design to ensure a cohesive, aesthetically pleasing, and safe campus.[6] For the CBU Specific Plan area, these design guidelines replace the *Citywide Design Guidelines and Sign Guidelines*, and the design guidelines of the *Magnolia Avenue Specific Plan.*

Architectural design will be cohesive throughout the CBU Specific Plan area. New construction and modifications to existing structures will consider the relationship and compatibility of a proposed project with their surroundings through an assessment of the existing site and neighborhood and historic context. To create a consistent aesthetic for the campus, the Yeager Center building, with its architectural style and quality that combine authentic details with contemporary execution, will be used as a base reference for architectural mass, scale, and detail needs to be identified. Prior to the schematic design of any project, a site analysis would be conducted to form the design parameters. Issues such as land use, interface with adjoining uses, visibility of facilities, cultural and historic resources, architectural character, and landscape and streetscape relationships will be considered. As part of context planning, the potential effect of the new edge development projects on the neighborhood and the *Magnolia Heritage District* will be assessed for projects along the perimeter of the Campus Zone that neighbor adjacent land uses.

Landscape design will be implemented to achieve unification encompassing the entire campus area while respecting the area's historic context. Continuity is achieved through the use of hardscape materials, plant materials, and planting character arranged in various scales and intensities.

Site furnishing design will include street elements such as decorative paving and fountains, and benches, bollards, and bicycle parking to enhance the pedestrian environment.

Campus streetscape/median design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians, bicyclists, and users of other non-motorized modes of transportation, the streetscape will be enhanced with distinctive street furnishings, lighting, and

[6] *California Baptist University Specific Plan Amendment.* Chapter 7 Section B, Subsection 1. Section C, Subsection 1. Section D, Subsection 1-2. Section E, Subsection 1. City of Riverside. Public Review Draft August 2018

paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Diana Avenue and State Route 91, Adams Street, and Monroe Street will require greater coordination with the City and other agencies (e.g., Caltrans) to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements.

Entrance and corner design will focus on the primary entries and major intersections of the campus-bounding streets that will serve to announce and identify the campus boundaries and entrances. These key features create a sense of arrival and provide an opportunity to make a lasting impression on first-time visitors.

Fence and wall design will be compatible with and consist of materials and color schemes similar to those of the campus architectural design. Additionally, the fence and wall concept is important to provide security, privacy, and a sense of enclosure and ownership.

Open space design includes a network of open spaces of varying sizes and for a variety of purposes. The open space network is anchored by a triangulated axis of expansive open space elements anchored by the Magnolia Lawn and athletic fields. Open space also includes natural landscaped areas and lawns, plazas, courtyards, and water quality basins. Throughout the campus, the open space design elements will ensure a park-like setting is maintained.

Lighting design will include warm, simple lighting geared to the CBU community's distinctive character. Decorative lighting fixtures will be designed to complement the architecture and landscaping of the campus during the day and become an integral part of the functionality and aesthetic quality of the campus during the night.

Campus art design will support the *Art on Campus Program*, which is designed to promote the involvement of artists in on-campus development and improvement projects. The program is intended to enhance the physical environment by celebrating CBU's unique character and identity, as well as create artistic harmony between the campus buildings, landscape, and open spaces. Examples of items qualifying as art include water features, decorative paving and mosaics, murals, sculptures, decorative carvings, ornamental benches, special light shows, and other items of a unique and high-quality nature that embody artistic elements.

Sustainable Design will meet the both the University's and the City of Riverside's commitment to use natural resources in thoughtful and responsible ways that recognize the needs of future generations. Environmental stewardship is to be emphasized in every new construction and reconstruction project, with the University committing to go beyond the requirements of the California Green Building Standards Code (CALGreen) as practical.

For the CBU Specific Plan Zone, these design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*. These guidelines are intended to ensure design consistency throughout the CBU Specific Plan Zone for an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model. However, the guidelines retain a degree of flexibility to accommodate various development types within the CBU Specific Plan Zone and facilitate a compatible transition between the CBU Specific Plan Zone and adjacent properties that would be subject to the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan.*

4.1.5 Environmental Impacts Before Mitigation

The CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions and support the CBUSP Amendment objectives and policies to ensure an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model.

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

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

The CBUSP Amendment identifies viewshed opportunities from the CBU Specific Plan Zone. In particular, Magnolia Avenue is designated a Scenic Boulevard, Parkway, and Special Boulevard, and development within the viewshed of Magnolia Avenue has the potential to impact its aesthetic appeal to the community. Accordingly, the CBUSP Amendment includes several

[7] *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. Page 5.1-2. City of Riverside. December 2007.

objectives and policies, as outlined in Section 4.1.42, which require all CBU-administered development to protect and improve the aesthetic qualities of Magnolia Avenue in accordance with the *General Plan 2025* and the CBUSP Amendment.

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

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

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

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

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

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

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

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

Future development will be required to adhere to the land use regulations and development standards (Chapter 4) and design guidelines (Chapter 5) outlined in the CBUSP Amendment, which will ensure that height, scale, and design elements will be aesthetically pleasing and complementary to existing development, the Magnolia Avenue corridor, and the *Magnolia Heritage District*. Although Magnolia Avenue is designated by the City as a Scenic Boulevard, Parkway, and Special Boulevard, there are no state scenic highways near the Project site as identified by the California Scenic Highway Program.[8] Therefore, the Project will have a less than significant impact to scenic resources within a State scenic highway. No mitigation is required.

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

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

Implementation of the proposed CBUSP Amendment will improve the aesthetic qualities of the CBU and surrounding community. The proposed Project would comply with the Land Use Regulations and Development Standards (Chapter 4) and Design Guidelines (Chapter 5) of the CBUSP that meet the objectives and policies of the *General Plan 2025* and will supplant the *Magnolia Avenue Specific Plan* and *2013 CBUSP*. Development within the CBU Specific Plan Zone will improve upon the existing visual character of the Project site while maintaining consistency with the existing visual character of the surrounding community. CBU is a major contributor to the existing visual character and historic fabric of Magnolia Avenue, as the Campus boasts several facilities dating to the late 19th and early 20th Centuries that contribute to the historic nature of the *Magnolia Heritage District.* Accordingly, the proposed CBUSP Amendment includes several policies designed to maintain the aesthetic and historical nature of the *Magnolia Heritage District* while facilitating the anticipated future development of the CBU campus.

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

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

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

these locations will include dense, attractive landscaping, uniform high-quality fencing materials, strong architectural design, a comprehensive sign program, and attractive campus gateways.

Future development will be required to adhere to the land use regulations and development standards (Chapter 4) and design guidelines (Chapter 5) outlined in the CBUSP Amendment which will ensure that height, scale, and design elements will be aesthetically pleasing and complementary to existing development, the Magnolia Avenue corridor, and the *Magnolia Heritage District*. These guidelines are intended to ensure design consistency throughout the CBU Specific Plan Zone for an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model. However, the Specific Plan retains a degree of flexibility to accommodate various development types within the CBU Specific Plan Zone and facilitate a compatible transition between the CBU Specific Plan Zone and adjacent properties that would be subject to the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan.*

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

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

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

Land use regulations and development standards (Chapter 4) and design guidelines (Chapter 5) outlined in the CBUSP Amendment will ensure light sources will not result in significant glare or adversely affect day or nighttime views in the area. General lighting guidelines in the CBUSP Amendment recommend concealed light sources to minimize glare. Additionally, outdoor lighting must be focused, directed, and arranged to prevent glare and illumination on public streets and any adjacent properties not owned by CBU. As necessary for each increment of

development resulting from implementation of the CBUSP Amendment, photometric light studies will be submitted by CBU and approved by Planning staff to ensure no light spillage onto public right-of-way or adjacent properties. High intensity lights are discouraged, except for use on athletic fields and student recreation facilities.[9]

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

- Installation and use of athletic field lighting shall be restricted to formal athletic facilities used for NCAA competition.
- Athletic field light standards shall be a maximum height of 99 feet. However, through the Administrative Minor Modification process, higher standards may be permitted as required for specific needs, subject to review by the Riverside County Airport Land Use Commission for compliance with the Riverside County Airport Land Use Compatibility Plan.
- All athletic field lighting shall be designed oriented to avoid spillover glare and illumination of any adjacent properties not within the Specific Plan area. This may require the use of cut-off shields or other approaches.

According to Riverside Municipal Code Chapter 19.590.070(B) (*Light and Glare*), stadium and playing field lighting height is not restricted to the maximum permitted building height of the zone where such lights are located. Therefore, athletic field lighting within the CBU Specific Plan Zone will be subject to height standards administered by the Land Use Compatibility Plan prepared for Riverside Municipal Airport (ALUCP).[10]

The CBU Specific Plan Zone is located approximately two miles south of the Riverside Municipal Airport. Portions of the CBU Specific Plan Zone lie within Compatibility Zone D (*Primary Traffic Patterns and Runway Buffer Area*) and Compatibility Zone E (*Other Airport Environs*) of the ALUCP as shown on Figure 4.8-1. In Zone D, any development over 70 feet tall

[9] *California Baptist University Specific Plan Amendment.* Chapter 7, Section I, Subsection 1. City of Riverside. Public Review Draft, August 2018.

[10] *Riverside County Airport Land Use Compatibility Plan*. Adopted by Riverside County Airport Land Use Commission. Table 2A. October 14, 2004.

will be subject to airspace review by the Riverside County Airport Land Use Commission (RCALUC). In Zone E, any development over 100 feet tall will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.

All future development administered by the CBU would be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the CBUSP Amendment, the *General Plan 2025*, and Riverside Municipal Code Chapter 19.556 (Lighting) and Chapter 19.590.070 (*Light and Glare*). Additionally, since the CBU Specific Plan Zone is within Compatibility Zone D (*Primary Traffic Patterns and Runway Buffer Area*) and Compatibility Zone E (*Other Airport Environs*) of the ALUCP, the Riverside County Airport Land Use Commission would review the proposed CBUSP Amendment for compliance with the Riverside County Airport Land Use Compatibility Plan pursuant to California Public Utilities Code Section 21676. Project-specific conditions imposed by the ALUCP will be implemented as applicable so that all future development facilitated under the CBUSP Amendment within Compatibility Zone D and Compatibility Zone E will occur in accordance with the ALUCP. Through compliance with design elements outlined in Chapter 5 of the CBUSP Amendment the *General Plan 2025*, Riverside Municipal Code Chapter 19.556 (*Lighting*) and Chapter 19.590.070 (*Light and Glare*), and the ALUCP, the Project will have a **less than significant impact** to light and glare. No mitigation is required.

4.1.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to aesthetics have been found to be potentially significant, no mitigation measures are required. Adherence to standard procedures, including applicable objectives and policies of the CBUSP Amendment, *Riverside General Plan 2025*, and Riverside Municipal Code Chapters 19.556 (*Lighting*), 19.580 (*Parking and Loading*), 19.590.070 (*Light and Glare*), and 19.730 (*Minor Conditional Use Permit*), will ensure all impacts related to aesthetics are less than significant.

4.1.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates that the Project will not exceed significance criteria for aesthetic impacts. Therefore, all aesthetic impacts are **less than significant**, and no mitigation measures are required.

4.1.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Department of Transportation, *California Scenic Highway Mapping System* Updated September 7, 2011. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm (Accessed August 8, 2017).

City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside. *City of Riverside General Plan 2025*. November 2007, Amended November 2012 and March 2013.

City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. December 2007.

City of Riverside, *Initial Study and Mitigated Negative Declaration for the California Baptist University Specific Plan.* January 2012.

City of Riverside, *Magnolia Avenue Specific Plan*. Resolution No. 21931. November 2009.

City of Riverside, Riverside Municipal Code Chapter 19.556 – Lighting. https://www.riversideca.gov/municode/pdf/19/article-8/19-556.pdf (Accessed May 9, 2016).

County of Riverside, *Riverside County Airport Land Use Compatibility Plan*. Adopted by Riverside County Airport Land Use Commission October 14, 2004.

THIS PAGE INTENTIONALLY LEFT BLANK

4.2 AGRICULTURE AND FORESTRY RESOURCES

Based on Appendix G of the State of California Environmental Quality Act (CEQA) Guidelines, the following analysis addresses the Project's potential to: convert or rezone farmland, forest land, or timberland; conflict with existing zoning for agricultural uses, Williamson Act contracts, forest land, timberland, or timberland zoned for timberland production; or result in the loss of forest land or convert forest land to a non-forest use with implementation of the proposed Project. No written comments regarding agriculture and forestry resources were received in response to the NOP.

4.2.1 Setting

The area encompassed by the CBU Specific Plan Zone developed slowly during the late 19th and early 20th Centuries as small citrus groves and associated farm- and ranch-steads.[1] As development of the region continued, the Neighbors of Woodcraft, a fraternal organization, acquired a portion of the subject property and converted an on-site existing structure into a retirement home, later constructing an adjacent hospital. In 1955, the then-California Baptist College acquired the Neighbors of Woodcraft complex and converted the on-site buildings to educational facilities, and the subject property has been used for educational purposes ever since.

Existing Conditions

The site is developed with a university and associated facilities and is surrounded by urban development. Surrounding land uses include single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; and single-family and multi-family residential, commercial, and school uses to the west. State Route 91 (SR-91) is located to the south. General commercial uses comprised primarily of automotive dealerships and service centers are located farther south beyond SR-91.

According to the Farmland Mapping and Monitoring Program (FMMP), as shown on Figure 4.2-1, the Project site consists of Urban and Built-Up Land.[2,3] According to the California (DOC) and the City's *General Plan 2025*, there are no Williamson Act contracts on or within the

[1] *California Baptist University Specific Plan, Administrative Draft* Chapter 6, Section A.City of Riverside. August 2018.

[2] Open Space and Conservation Element, *Riverside General Plan 2025*. Figure OS-2. City of Riverside. November 2007, Amended November 2012.

[3] California Department of Conservation, Farmland Mapping and Monitoring Program. *Riverside County Important Farmland 2016 (Sheet 1 of 3)*. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx (Accessed August 17, 2017).

general vicinity of the Project site.[4] Additionally, the Project site does not contain forest land, timberland, or Timberland Production areas (as defined in the Public Resources Codes 12220(g) and 4526 or Government Code 51104(g)).

4.2.2 Related Regulations

Federal Regulations

There are no federal regulations regarding agriculture or forestry resources that are applicable to the proposed Project.

State Regulations

The California Government Code (Section 65570) requires the collection and reporting of agricultural land use acreage and conversion by June 30 of each even-numbered year. Utilizing data from the U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey and current land use information, the California DOC, and FMMP[5] compiles important farmland maps for each county within the State. Maps and statistics are produced biannually using a process that integrates aerial photo interpretation, field mapping, a computerized mapping system, and public review. These maps delineate land use in eight mapping categories (and one overlay category) and represent an inventory of agricultural soil resources within Riverside County. Through the FMMP, agricultural resources are separated into the following categories:[6]

- **Prime Farmland:** Lands with the best combination of physical and chemical features and able to sustain long-term production of agricultural crops. This land must have been used to produce irrigated crops at some time during the two update cycles prior to the mapping date.

- **Farmland of Statewide Importance:** Land similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. This land must have been used to produce irrigated crops at some time during the two update cycles prior to the mapping date.

---

4 Open Space and Conservation Element, *Riverside General Plan 2025*. Figure OS-3. City of Riverside. November 2007, Amended November 2012.

5 *A Guide to the Farmland Mapping and Monitoring Program*, California Department of Conservation, Division of Land Resources Protection, 2004 Edition.

6 Section 5.2-Agricultural Resources, *City of Riverside General Plan and Supporting Documents Environmental Impact Report*. Pages 5.2-4 and 5.2-5. City of Riverside. November 2007.

- **Unique Farmland:** Lands with lesser quality soils used to produce leading agricultural crops. Includes non-irrigated orchards or vineyards.

- **Farmland of Local Importance:** Lands of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.

- **Grazing Land:** Lands on which existing vegetation is suited to livestock grazing. This category was developed in cooperation with the California Cattlemen's Association and U.C. Cooperative Extension.

For purposes of reporting changes in land use as required for FMMP's biennial farmland conversion report, the DOC also categorizes land as Urban and Built-Up Land or Other Land, which are defined as:

- **Urban and Built-Up Land:** Lands occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes.

- **Other Land:** Lands not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land.

The Project site is designated "Urban and Built-Up Land" by the DOC FMMP.

California Land Conservation Act (Williamson Act) of 1965. The California Land Conservation Act of 1965, also referred to as the Williamson Act, is a non-mandated State program administered by counties and cities for the preservation of agricultural land. This program enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space use. In return, landowners receive much lower property tax assessments than normal because the assessments are based upon farming and open space uses rather than full market value.

Public Resources Code Section 12220(g) – Forest Land. Public Resources Code (PRC) Section 4526 defines timberland as:

> Land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

Public Resources Code Section 4526 – Timberland. Section 12220(g) of the PRC defines forest land as:

> Land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

Government Code Section 51004(g) – Timberland Production. Government Code Section 51104(g) defines timberland zoned as timberland production as:

> An area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber with compatible uses, as defined in subdivision (h).

Local Regulations

Riverside General Plan 2025. The City's *General Plan 2025* Environmental Impact Report outlines several General Plan objectives and policies pertaining to agricultural resources throughout the City.[7] However, none of these objectives and policies pertain to the proposed Project because of the lack of agricultural uses on or near the Project site.

Urban Forestry Policy Manual. The City's Urban Forestry Policy Manual is a guideline for the plating, pruning, preservation and removal of all trees in the City rights-of-way and recreational facilities. The manual does not apply to trees located on private property. For any future development within the CBU Specific Plan Zone, edge effects to existing off-site landscaping would be addressed in accordance with Chapter 5 (Design Guidelines) of the CBUSP Amendment.

For example, a continuation of CBU's picturesque, park-like campus setting is required, and all landscaping near Magnolia Avenue, Adams Street, and Monroe Avenue would be designed to reinforce visual and thematic connections to the landscaping along these streets. The boundaries of the CBU Specific Plan Zone along Magnolia Avenue, Adams Street, Monroe Street, and

[7] Section 5.2-Agricultural Resources, *City of Riverside General Plan and Supporting Documents Environmental Impact Report*. Pages 5.2-16 to 5.2-18. City of Riverside. November 2007.

Diana Avenue/SR-91 would be treated with recurring plant materials to visually unify the campus, while being mindful of the surrounding neighborhoods.

Additionally, if implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual.

4.2.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on agriculture and forestry resources if it would:

- (Threshold A) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP) of the California Resources Agency, to non-agricultural use;

- (Threshold B) Conflict with existing zoning for agricultural use, or a Williamson Act contract;

- (Threshold C) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]);

- (Threshold D) Result in the loss of forest land or conversion of forest land to non-forest use; and/or

- (Threshold E) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use.

Methodology

The methodological analysis underlying this section of the EIR consists of the following:

- Identify the FMMP designation of the site;

- Identify existing and proposed General Plan 2025 land use designations and zoning for the site and adjacent areas to determine potential conflicts between agricultural and non-agricultural uses; and
- Use NRCS data to further analyze any potential impacts to agricultural resources.

For forest land analysis, the City's General Plan 2025 and Zoning Ordinance were considered in order to determine whether the Project would conflict with forest or timberland zoning.

4.2.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through design. Because there are no agricultural or forestry resources on the Project site, the proposed Project does not include any design features with regard to these resources.

4.2.5 Environmental Impacts Before Mitigation

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

The Project site is developed with CBU-related facilities comprised of academic buildings, student housing, athletic facilities, arts and culture venues, parking lots, and an open space network of lawns, athletic fields, plazas, courtyards, and water quality basins within an urbanized area. Additionally, non-CBU-related commercial uses operated under license or lease arrangement with CBU are located within the Project site. The proposed Project includes rezone of the site from CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000 SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones to CBU SP-1 California Baptist University Specific Plan - Subdistrict 1 and CBU SP-2 – California Baptist University Specific Plan – Subdistrict 2.

The Project site is designated "Urban and Built-Up Land" by the California DOC FMMP and as depicted in Figure OS-2, Agricultural Suitability, in the City's *General Plan 2025*.[8,9] Since the site is already developed with university-related facilities and is not located on any Farmland designations, no conversion of Farmland to non-agricultural use would occur. Therefore, the Project will have **no impact** to Farmland. No mitigation is required.

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

The Project site is zoned CBUSP and *Magnolia Avenue Specific Plan.* There are no existing agricultural uses on or in the vicinity of the Project site. The Project site is currently zoned CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000 SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones, and is not zoned for agricultural use. According to the DOC's Williamson Act map and Figure OS-3, Williamson Act Preserves, in the City's *General Plan 2025,* there are no Williamson Act contracts on the Project site.[10,11] Therefore, the Project will have **no impact** to agricultural zoning or Williamson Act contract lands. No mitigation is required.

Threshold C: Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])?

The Project site is zoned CBUSP and *Magnolia Avenue Specific Plan.* The Project site is currently zoned CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/ Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/ Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban,

---

8 Open Space and Conservation Element. *Riverside General Plan 2025.* Figure OS-2. City of Riverside. November 2007, Amended November 2012.

9 California Department of Conservation, Farmland Mapping and Monitoring Program. *Riverside County Important Farmland 2016 (Sheet 1 of 3).* http://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx (Accessed August 17, 2017).

10 Open Space and Conservation Element. *Riverside General Plan 2025*. Figure OS-3. City of Riverside. November 2007, Amended November 2012.

11 California Department of Conservation, The Land Conservation Act. *Riverside County Williamson Act FY 2015/2016 (Sheet 1 of 3).* ftp://ftp.consrv.ca.gov/pub/dlrp/wa/ (Accessed August 17, 2017).

CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000 SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones. No forest land, timberland, or Timberland Production areas (as defined in the PRC 12220(g) and PRC 4526 or Government Code 51104(g)) are located within or adjacent to the Project site. Therefore, **no impact** to forest land or timberland will occur from this Project. No mitigation is required.

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

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

Threshold E: Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

The Project site is developed with CBU-related facilities comprised of academic buildings, student housing, athletic facilities, arts and culture venues, parking lots, and an open space network of lawns, athletic fields, plazas, courtyards, and water quality basins within an urbanized area. Additionally, non-CBU-related commercial uses operated under license or lease arrangement with CBU are located within the Project site. The Project site is currently zoned CBUSP-MU/A – California Baptist University Specific Plan - Mixed Use/Academic, CBUSP-MU/R – California Baptist University Specific Plan - Mixed Use/Residential, CBUSP-MU/U – California Baptist University Specific Plan - Mixed Use/Urban, CBUSP-A – California Baptist University Specific Plan - Athletics, CBUSP-OS – California Baptist University Specific Plan - Open Space and R-1-7000 SP – Single-Family Residential Zone and Specific Plan (*Magnolia Avenue*) Overlay Zones. The Project site is designated "Urban and Built-Up Land" by the California DOC FMMP and as depicted in Figure OS-2, Agricultural Suitability, in the City's *General Plan 2025*.[12,13] Since the site is already developed with university related facilities and is

[12] Open Space and Conservation Element, *Riverside General Plan 2025*. Figure OS-2. City of Riverside. November 2007, Amended November 2012.

[13] California Department of Conservation, Farmland Mapping and Monitoring Program. *Riverside County Important Farmland 2016 (Sheet 1 of 3)*. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx (Accessed August 17, 2017).

not located on any Farmland designations, no conversion of Farmland to non-agricultural use would occur. The Project site contains no forest land or timberland. Therefore, **no impacts** related to the conversion of Farmland to non-agricultural use or to the loss of forest land and/or timberland will occur with implementation of the proposed Project. No mitigation is required.

4.2.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to agriculture and forestry resources would occur, no mitigation measures are required. Due to the lack of any agricultural or forest land or Williamson Act contracts within the CBU Specific Plan Zone, California Government Code (Section 65570), the California Land Conservation Act (Williamson Act) of 1965, and agricultural-related policies of the *Riverside General Plan 2025* do not apply to the proposed Project.

4.2.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates the Project will have no impacts to agriculture and forestry resources. Therefore, no mitigation measures are required.

4.2.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Department of Conservation, Division of Land Resources Protection. *A Guide to the Farmland Mapping and Monitoring Program*. 2004 Edition.

California Department of Conservation, Farmland Mapping and Monitoring Program. *Riverside County 2016 Field Report, Western Riverside County*. http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/2014-2016/field_reports/riv16.pdf (Accessed August 17, 2017).

California Department of Conservation, Farmland Mapping and Monitoring Program. *Riverside County Important Farmland 2016 (Sheet 1 of 3)*. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Riverside.aspx (Accessed August 17, 2017).

California Department of Conservation, The Land Conservation Act. *Riverside County Williamson Act FY 2015/2016 (Sheet 1 of 3)*. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/ (Accessed August 17, 2017).

City of Riverside. *California Baptist University Specific Plan Public Review Draft.* August 2018.

City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside, *City of Riverside General Plan 2025*. November 2007, Amended November 2012 and March 2013.

City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. December 2007.

City of Riverside, *Initial Study and Mitigated Negative Declaration for the California Baptist University Specific Plan.* January 2012.

4.3 AIR QUALITY

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the potential air quality impacts associated with the implementation of the proposed Project. The City received a comment letter from the South Coast Air Quality Management District (SCAQMD) that summarizes its recommendations and guidance regarding preparation of an air quality analysis for the proposed Project. The analysis contained in this section is based upon the following report:

- *Air Quality and Greenhouse Gas Impact Analysis, California Baptist University Specific Plan Update,* LSA. December 2017 (EIR Appendix B).

4.3.1 Setting

Climate and Meteorology

The Project site is located within the South Coast Air Basin (Basin), which includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality in the Project area is affected not only by various emission sources (e.g., mobile or industry), but also by atmospheric conditions such as wind speed, wind direction, temperature, and rainfall. The Basin's combination of topography, low mean mixing height, abundant sunshine, and emissions from one of the largest urban areas in the United States has historically resulted in some of the worst air pollution in the nation.

Although the Basin has a semiarid climate, air near the surface is generally moist because of the presence of a shallow marine layer. With very low average wind speeds, there is a limited capacity to disperse air contaminants horizontally. The dominant daily wind pattern is an onshore daytime breeze of 8–12 miles per hour (mph) and an offshore nighttime breeze of 3–5 mph. The typical wind pattern fluctuates only with occasional winter storms or strong northeasterly Santa Ana winds from the mountains and deserts northeast of the Basin. Summer wind patterns represent worst-case conditions because this is the period of higher temperatures and more sunlight, which results in more ozone (O_3) formation.

The City of Riverside's climate is characterized by relatively low rainfall, with warm summers and mild winters. Average temperatures range from a high of 95 degrees Fahrenheit (°F) in

August to a low of 40°F in December. Annual precipitation averages about 2.3 inches, falling mostly from December through March.[1]

During spring and early summer, pollution produced during any one day is typically blown out of the Basin through mountain passes or lifted by warm, vertical currents adjacent to mountain slopes. The vertical dispersion of air pollutants in the Basin is limited by temperature inversions in the atmosphere close to the Earth's surface. The combination of stagnant wind conditions and low inversions produces the greatest pollutant concentrations. On days of no inversion or high wind speeds, ambient air pollutant concentrations are lowest. During periods of low inversions and low wind speeds, air pollutants generated in urbanized areas are transported predominantly onshore into Riverside and San Bernardino Counties. In the winter, the greatest pollution problems are carbon monoxide (CO), particulate matter ($PM_{2.5}$ and PM_{10}), and nitrogen dioxide (NO_2) because of extremely low inversions and air stagnation during the night and early morning hours. In the summer, the longer daylight hours and the brighter sunshine combine to cause a reaction between hydrocarbons and oxides of nitrogen (NO_x) to form photochemical smog.

Sensitive Receptors

Air quality varies as a direct function of the amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions. Air quality problems arise when the rate of pollutant emissions exceeds the rate of dispersion. Reduced visibility, eye irritation, and adverse health impacts upon those persons termed "sensitive receptors" are the most serious hazards of existing air quality conditions in the area. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. People most likely to be affected by air pollution, as identified by the California Air Resources Board (ARB), may include children, the elderly, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors may include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes.

The nearest sensitive receptors to the Project site are existing on-campus student housing and academic facilities on the Project site itself. Land uses surrounding the CBU campus include single-family and multi-family residential, church, and convalescent uses to the north; single-family residential, church, retail, and office uses to the east; single-family and multi-family residential, commercial, church and school uses to the west; and State Route 91 to the south.

[1] City-Data.com. 2017. http://www.city-data.com/city/Riverside-California.html. Website Accessed December 19, 2017.

Regional Air Quality

Both the State of California and the Federal government have established health-based Ambient Air Quality Standards (AAQS) for seven air pollutants. As detailed in Table 4.3.A, these pollutants include ozone (O_3), CO, nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter less than 10 microns in size (PM_{10}), particulate matter less than 2.5 microns in size ($PM_{2.5}$), and lead. In addition, the State has set standards for sulfates, hydrogen sulfide (H2S), vinyl chloride, and visibility-reducing particles. These standards are designed to protect the health and welfare of the populace with a reasonable margin of safety.

Table 4.3.B summarizes the primary health effects and sources of common air pollutants. Because federal and State concentration standards were set at levels that protects public health with an adequate margin of safety, these health effects will not occur unless the standards are exceeded by a large margin or for a prolonged period of time. State AAQS are more stringent than federal AAQS. Among the pollutants, O_3 and particulate matter ($PM_{2.5}$ and PM_{10}) are considered pollutants with regional effects, while the others have more localized effects.

The California Clean Air Act (CCAA) provides the SCAQMD and other regional air quality districts with the authority to manage transportation activities at indirect sources of pollution. Such sources include any facility, building, structure, or installation, or combination thereof, that attracts or generates mobile source activity that results in emissions of any pollutant. In addition, area source emissions that are generated when minor sources collectively emit a substantial amount of pollution are also managed by the regional air quality districts. Examples of this would be the motor vehicles at an intersection, a mall, and on highways. The SCAQMD also regulates stationary sources of pollution throughout its jurisdictional area. Direct emissions from motor vehicles are regulated by ARB.

In addition to setting out primary and secondary AAQS, the State has established a set of episode criteria for O_3, CO, NO_2, SO_2, and PM_{10}. These criteria refer to episode levels representing periods of short-term exposure to air pollutants that threaten public health. Health effects are progressively more severe as pollutant levels increase from Stage One to Stage Three. An alert level is that concentration of pollutants at which initial stage control actions are to begin. An alert will be declared when any one of the pollutant alert levels is reached at any monitoring site and when meteorological conditions are such that the pollutant concentrations can be expected to remain at these levels for 12 or more hours or to increase; or, in the case of oxidants, the situation is likely to recur within the next 24 hours unless control actions are taken.

Table 4.3.A
Ambient Air Quality Standards

Pollutant	Average Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
O_3	1 hour	0.09 ppm (180 µg/m^3)	—	Same as primary standard
	8 hours	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)	
CO	8 hours	9.0 ppm (10 mg/m^3)	9 ppm (10 mg/m^3)	None
	1 hour	20 ppm (23 mg/m^3)	35 ppm (40 mg/m^3)	
NO_2	Annual arithmetic mean	0.030 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)	Same as primary standard
	1 hour	0.18 ppm (339 µg/m^3)	0.100 ppm (188 µg/m^3)	
SO_2	1 hour	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)	—
	3 hours	—	—	0.5 ppm (1300 µg/m^3)
	24 hours	0.04 ppm (105 µg/m^3)	0.14 ppm (for certain areas)[7]	—
	Annual	—	0.030 ppm (for certain areas)[7]	—
PM_{10}	24 hours	50 µg/m^3	150 µg/m^3	Same as primary standard
	Annual arithmetic mean	20 µg/m^3	—	
$PM_{2.5}$	24 hours	No separate State standard	35 µg/m^3	Same as primary standard
	Annual arithmetic mean	12 µg/m^3	12.0 µg/m^3	15.0 µg/m^3
Lead[f]	30-day average	1.5 µg/m^3	—	—
	Calendar quarter	—	1.5 µg/m^3 (for certain areas)[g]	Same as primary standard
	Rolling 3-month average	—	0.15 µg/m^3	
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m^3)	—	—
Vinyl chloride[f]	24 hours	0.01 ppm (26 µg/m^3)	—	—
Sulfates (SO_4)	24 hours	25 µg/m^3	—	—

Table 4.3.A
Ambient Air Quality Standards

Pollutant	Average Time	California Standards[a]	National Standards[b]	
		Concentration[c]	*Primary*[c,d]	*Secondary*[c,e]
Visibility -reducing particles	8 hours (10:00 a.m. to 6:00 p.m. PST)	Insufficient amount to produce an extinction coefficient of 0.23 per kilometer due to particles when the relative humidity is less than 70%	—	—

Source: ARB Fact Sheet: Air Pollution and Health. Website: http://www.arb.ca.gov/research/health/fs/fs1/fs1.htm (accessed December 2017).

ppm = parts per million by volume; $\mu g/m^3$ = micrograms per cubic meter; mg/m^3= milligrams per cubic meter

[a] California standards for O_3, CO, SO_2 (1-hour and 24-hour), NO_2, suspended particulate matter—PM_{10}, $PM_{2.5}$, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. CAAQS are listed in the Table of Standards in 17 CCR 70200.

[b] National standards (other than O_3, NO_2, SO_2, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth-highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard.

[c] Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius (°C) and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

[d] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

[e] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[f] ARB has identified lead and vinyl chloride as TACs with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[g] In 2010, a new 1-hour SO_2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO_2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment of the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

Table 4.3.B
Summary of Health Effects of the Major Criteria Air Pollutants

Pollutant	Health Effects	Examples of Sources
Particulate Matter ($PM_{2.5}$ and PM_{10}: less than or equal to 2.5 or 10 microns, respectively)	Hospitalizations for worsened heart diseases Emergency room visits for asthma Premature death	Cars and trucks (especially diesels) Fireplaces, wood stoves Windblown dust from roadways, agriculture, and construction

Table 4.3.B
Summary of Health Effects of the Major Criteria Air Pollutants

Pollutant	Health Effects	Examples of Sources
Ozone (O_3)	Cough, chest tightness Difficulty taking a deep breath Worsened asthma symptoms Lung inflammation	Precursor sources[1]: motor vehicles, industrial emissions, and consumer products
Carbon Monoxide (CO)	Chest pain in heart patients[2] Headaches, nausea[2] Reduced mental alertness[2] Death at very high levels[2]	Any source that burns fuel, such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Nitrogen Dioxide (NO_2)	Increased response to allergens	See carbon monoxide sources
Toxic Air Contaminants	Cancer Chronic eye, lung, or skin irritation Neurological and reproductive disorders	Cars and trucks (especially diesels) Industrial sources such as chrome platers Neighborhood businesses such as dry cleaners and service stations Building materials and products

Source: ARB Fact Sheet: Air Pollution and Health. Website: http://www.arb.ca.gov/research/health/fs/fs1/fs1.htm (accessed August 2017).
[1] Ozone is not generated directly by these sources. Rather, chemicals emitted by these precursor sources react with sunlight to form ozone in the atmosphere.
[2] Health effects from CO exposures occur at levels considerably higher than ambient.
ARB = California Air Resources Board

Pollutant alert levels:

- O_3: 392 micrograms per cubic meter ($\mu g/m^3$) (0.20 parts per million [ppm]), 1-hour average.
- CO: 17 milligrams per cubic meter (mg/m^3) (15 ppm), 8-hour average.
- NO_2: 1,130 $\mu g/m^3$ (0.6 ppm), 1-hour average; 282 $\mu g/m^3$ (0.15 ppm), 24-hour average.
- SO_2: 800 $\mu g/m^3$ (0.3 ppm), 24-hour average.
- Particulates measured as PM_{10}: 350 $\mu g/m^3$, 24-hour average.

Local Air Quality

The SCAQMD, together with the ARB, maintains ambient air quality monitoring stations in the Basin. For evaluation purposes, SCAQMD has divided the Basin into 36 Source Receptor Areas (SRAs) that operate monitoring stations. SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. The closest SCAQMD air quality monitoring station to the Project site is the Riverside-Rubidoux station, which monitors criteria air pollutant data. The air quality trends from this station are used to represent the ambient air quality in the Project area. The pollutants monitored

are CO, O_3, PM_{10}, $PM_{2.5}$, and NO_2.[2, 3] The criteria pollutants monitored at this station are identified in Table 4.3.C.

Table 4.3.C
Ambient Air Quality Monitored in the Project Vicinity

Pollutant	Standard	2014	2015	2016
Carbon Monoxide (CO)				
Maximum 1-hour concentration (ppm)		2.4	4.1	1.7
Number of days exceeded:	State: > 20 ppm	0	0	0
	Federal: > 35 ppm	0	0	0
Maximum 8-hour concentration (ppm)		1.9	1.7	1.3
Number of days exceeded:	State: ≥ 9.0 ppm	0	0	0
	Federal: ≥ 9 ppm	0	0	0
Ozone (O_3)				
Maximum 1-hour concentration (ppm)		0.1	0.1	0.1
Number of days exceeded:	State: > 0.09 ppm	29	**31**	33
Maximum 8-hour concentration (ppm)		0.10	0.11	0.10
Number of days exceeded:	State: > 0.07 ppm	66	55	69
	Federal: > 0.070 ppm	**66**	**35**	**69**
Coarse Particulates (PM_{10})				
Maximum 24-hour concentration (µg/m^3)		100	69	84
Number of days exceeded:	State: > 50 µg/m^3	119	87	60
	Federal: > 150 µg/m^3	0	0	0
Annual arithmetic average concentration (µg/m^3)		44.8	40.0	NA
Exceeded for the year:	State: > 20 µg/m^3	Yes	Yes	NA
Fine Particulates ($PM_{2.5}$)				
Maximum 24-hour concentration (µg/m^3)		49	55	52
Number of days exceeded:	Federal: > 35 µg/m^3	2	**9**	5
Annual arithmetic average concentration (µg/m^3)		16.8	15.4	12.6
Exceeded for the year:	State: > 12 µg/m^3	Yes	Yes	Yes
	Federal: > 15 µg/m^3	Yes	Yes	No
Nitrogen Dioxide (NO_2)				
Maximum 1-hour concentration (ppm)		60	57	73
Number of days exceeded:	State: > 0.18 ppm	0	0	0
Annual arithmetic average concentration (ppm)		15	14	14
Exceeded for the year:	State: > 0.030 ppm	No	No	No
	Federal: > 0.053 ppm	No	No	No

[2] United States Environmental Protection Agency. Air Quality Data. Website: https://www.epa.gov/outdoor-air-quality-data (accessed December 2017).

[3] California Air Resources Board (ARB). iADAM: Air Quality Data Statistics. Website: http://www.arb.ca.gov/adam (accessed December 2017).

Table 4.3.C
Ambient Air Quality Monitored in the Project Vicinity

Pollutant	Standard	2014	2015	2016

Source 1: U.S. Environmental Protection Agency. Air Quality Data. Website: https://www.epa.gov/outdoor-air-quality-data (accessed December 2017).
Source 2: California Air Resources Board. iADAM Air Quality Data Statistics. Website: http://www.arb.ca.gov/adam (accessed December 2017).

$\mu g/m^3$ = micrograms per cubic meter
O_3 = ozone
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ND = no data available
PM_{10} = particulate matter less than 10 microns in size
ppm = parts per million

The federal and State 24-hour PM_{10} standard and the federal 24-hour $PM_{2.5}$ standard were exceeded at least nine times in the past three years. The State 1-hour O_3 standard was exceeded three to 31 times per year in the past three years. The federal 8 hour O_3 standard was exceeded 55 to 69 days a year in the past three years, and the State 8 hour O_3 standard was exceeded 35 to 69 times per year in the past three years.

Data collected at permanent monitoring stations are used by the EPA to classify regions as "attainment" or "nonattainment," depending on whether the regions met the requirements stated in the primary National Ambient Air Quality Standards (NAAQS). Nonattainment areas are imposed with additional restrictions as required by the EPA. Table 4.3.D identifies the attainment status of the Basin.

Table 4.3.D
Attainment Status of Criteria Pollutants in the South Coast Air Basin

Pollutant	State	Federal
O_3 1-hour	Nonattainment	Extreme Nonattainment
O_3 8-hour	Nonattainment	Extreme Nonattainment
PM_{10}	Nonattainment	Attainment/Maintenance
$PM_{2.5}$	Nonattainment	Serious Nonattainment
CO	Attainment	Attainment/Maintenance
NO_2	Attainment	Unclassified/Attainment (1-hour) Attainment/Maintenance (annual)
SO_2	Attainment	Unclassified/Attainment
Lead	Attainment[1]	Attainment[1]
All others	Attainment/Unclassified	Attainment/Unclassified

Source: Table E – Air Quality and Greenhouse Gas Emissions, LSA, December 2017.

[1] Except in Los Angeles County.

CO = carbon monoxide
N/A = not applicable
NO_2 = nitrogen dioxide
O_3 = ozone
PM_{10} = particulate matter less than 10 microns in size
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
SO_2 = sulfur dioxide

NOP Comments

The SCAQMD provided a written letter, dated May 11, 2016, to the City during the NOP comment period. In the letter, the SCAQMD outlines basic guidance regarding the preparation of an air quality impact analysis, provides recommendations to reduce potential air quality impacts associated with the proposed Project, and requests a copy of the Draft EIR upon its completion.

4.3.2 Related Regulations

Federal Regulations

Clean Air Act. Pursuant to the Federal Clean Air Act (CAA) of 1970, the EPA established NAAQS. The NAAQS were established for six major pollutants, termed "criteria" pollutants. Criteria pollutants are defined as those pollutants for which the Federal and State governments have established AAQS, or criteria, for outdoor concentrations in order to protect public health. In April 2003, the EPA was cleared by the White House Office of Management and Budget (OMB) to implement the eight-hour ground-level O3 standard. The EPA issued the proposed rule implementing the eight-hour O3 standard in April 2003. The EPA completed final eight-hour nonattainment status on April 15, 2004. The EPA issued the final PM2.5 implementation rule in fall 2004. The EPA issued final designations on December 15, 2004.

State Regulations

Mulford-Carrell Act. The State first set California Ambient Air Quality Standards (CAAQS) in 1969 under the mandate of the Mulford-Carrell Act. The CAAQS are generally more stringent than the NAAQS. In addition to the six criteria pollutants covered by the NAAQS, there are CAAQS for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Originally, there were no attainment deadlines for CAAQS; however, the CCAA of 1988 provided a time frame and a planning structure to promote their attainment. The CCAA required nonattainment areas in the State to prepare attainment plans and proposed to classify each such area on the basis of the submitted plan, as follows: moderate, if CAAQS attainment could not occur before December 31, 1994; serious, if CAAQS attainment could not occur before December 31, 1997; and severe, if CAAQS attainment could not be conclusively demonstrated at all. The attainment plans are required to achieve a minimum 5 percent annual reduction in the emissions of nonattainment pollutants unless all feasible measures have been implemented. The EPA has designated the Southern California Association of Governments (SCAG) as the Metropolitan Planning Organization (MPO) responsible for ensuring various air quality and transportation stakeholders in Southern California comply with the requirements of the CAA for the Basin.

California Code of Regulations Title 24, Part 6. Enacted in 1978, this part of the California Code of Regulations established energy efficiency standards for residential and nonresidential buildings in

response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and incorporation of new energy efficiency technologies and methods.

Regional Regulations

Lewis-Presley Air Quality Management Act. The 1976 Lewis Air Quality Management Act established the SCAQMD and other air districts throughout the State. The Federal Clean Air Act Amendments of 1977 required that each state adopt an implementation plan outlining pollution control measures to attain the Federal standards in nonattainment areas of that state. The California Air Resources Board is responsible for incorporating air quality management plans for local air basins into a State Implementation Plan (SIP) for EPA approval. Significant authority for air quality control within air quality basins has been given to regional air quality districts (e.g., the SCAQMD) that regulate stationary source emissions and develop local nonattainment plans.

Regional Air Quality Management Plan (AQMP). The SCAQMD and SCAG are responsible for formulating and implementing the AQMP for the Basin. The main purpose of an AQMP is to bring the area into compliance with Federal and State air quality standards. Every three years, the SCAQMD prepares a new AQMP, updating the previous plan and 20-year horizon. The SCAQMD adopted the 2016 AQMP in March 3, 2017 (SCAQMD 2017). The ARB approved the plan on March 10, 2017, and forwarded the AQMP to the EPA.

The Final 2016 AQMP incorporates the latest scientific and technological information and planning assumptions, including the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and updated emission inventory methodologies for various source categories. The Final 2016 AQMP included the new and changing federal requirements, implementation of new technology measures, and continued development of economically sound, flexible compliance approaches.

Key elements of the 2016 AQMP include:

- Calculating and taking credit for co-benefits from other planning efforts (e.g., climate, energy, and transportation).
- A strategy with fair-share emission reductions at the Federal, State, and local levels.
- Investment in strategies and technologies meeting multiple air quality objectives.
- Seeking new partnerships and significant funding for incentives to accelerate deployment of zero and near-zero technologies.
- Enhanced socioeconomic assessment, including an expanded environmental justice analysis.

- Attainment of the 24-hour $PM_{2.5}$ standard in 2019 with no additional measures.
- Attainment the annual $PM_{2.5}$ standard by 2025 with implementation of a portion of the ozone strategy.
- Attainment of the 1-hour ozone standard by 2022 with no reliance on "black box" future technology (CAA Section 182(e)(5) measures).

The Final 2016 AQMP proposes attainment demonstration of the federal $PM_{2.5}$ standards through a more focused control of sulfur oxides (SO_x), directly-emitted $PM_{2.5}$, and NO_x. The Final 2016 AQMP proposes policies and measures currently contemplated by responsible agencies to achieve federal standards for healthful air quality in the Basin and those portions of the Salton Sea Air Basin that are under SCAQMD jurisdiction. This Final Plan also addresses several Federal planning requirements and incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools.

Local Regulations

City of Riverside General Plan 2025.

The GP 2025 contains objectives and policies to protect air quality within the City in the Air Quality Element. Section 4.10 Land Use and Planning of this Draft EIR summarizes the Project's consistency with the applicable air quality related GP 2025 policies. The following objectives and policies are applicable to the proposed Project:

Objective AQ-1: Adopt land use policies that site polluting facilities away from sensitive receptors and vice versa; improve jobs-housing balance; reduce vehicle miles travelled and length of work trips; and improve the flow of traffic.

Policy AQ-1.8: Promote "Job/Housing Opportunity Zones" and incentives to support housing in job-rich areas and jobs in housing-rich areas, where the jobs are located at non-polluting or extremely low polluting entities.

Policy AQ-1.21: Cooperate and participate in regional air quality management plans, programs, and enforcement measures.

Policy AQ-1.21: Implement the required components of the Congestion Management Plan (CMP) and continue to work with Riverside County Transportation Commission on annual updates to the CMP.

Policy AQ-2.8: Work with Riverside Transit Authority (RTA) to establish mass transit mechanisms for the reduction of work-related and non-work-related vehicle trips.

Policy AQ-2.11: Develop ways to incorporate the "Good Neighbor Guidelines for Siting New and/or Modified Warehouse/Distribution Facilities" into the Development Review process and Citywide air quality education programs.

Policy AQ-3.6: Support "green" building codes that require air conditioning/filtration installation, upgrades or improvements for all buildings, but particularly for those associated with sensitive receptors.

Policy AQ-4.4: Support programs that reduce emissions from building materials and methods that generate excessive pollutants through incentives and/or regulations.

Policy AQ-4.5: Require the suspension of all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.

Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

4.3.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development Project may result in significant impacts. Based on Appendix G, the Project could have a significant impact on air quality if the Project would:

- (Threshold A) Conflict with or obstruct implementation of the applicable air quality plan;
- (Threshold B) Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- (Threshold C) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- (Threshold D) Expose sensitive receptors to substantial pollutant concentrations; and/or
- (Threshold E) Create objectionable odors affecting a substantial number of people?

In addition, Appendix G of the CEQA Guidelines indicates that, where available, the significance criteria established by the applicable AQMD or pollution control district may be

relied upon to determine whether the Project would have a significant impact on air quality. The most recent version of the SCAQMD *CEQA Air Quality Handbook* (SCAQMD 1993) sets forth quantitative emission significance thresholds, below which a project would not have a significant impact on ambient air quality. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented in Table 4.3.E, SCAQMD Air Quality Significance Thresholds, are exceeded.

A project would result in a substantial contribution to an existing air quality violation of the NAAQS or CAAQS for O_3, which is a nonattainment pollutant, if the Project's construction or operational emissions would exceed the SCAQMD VOC or NO_x thresholds shown in Table 4.3.E. These emissions-based thresholds for O_3 precursors are intended to serve as a surrogate for an "ozone significance threshold" (i.e., the potential for adverse O_3 impacts to occur) because O_3 itself is not emitted directly (see discussion of O_3 and its sources in Section 4.3.1), and the effects of an individual project's emissions of O_3 precursors (VOC and NO_x) on O_3 levels in ambient air cannot be determined through air quality models or other quantitative methods.

Table 4.3-E
SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	*Construction*	*Operation*
NO_x	100 lb/day	55 lb/day
VOCs	75 lb/day	55 lb/day
PM_{10}	150 lb/day	150 lb/day
$PM_{2.5}$	55 lb/day	55 lb/day
SO_x	150 lb/day	150 lb/day
CO	550 lb/day	550 lb/day
Toxic Air Contaminants and Odor Thresholds		
TACs (including carcinogens and noncarcinogens)	Maximum incremental cancer risk ≥ 10 in 1 million Hazard index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
Ambient Air Quality for Criteria Pollutants[b]		
NO_2 1-hour average NO_2 annual average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (State) 0.030 ppm (State) and 0.0534 ppm (Federal)	
PM_{10} 24-hour average PM_{10} annual arithmetic mean	10.4 μg/m^3 (construction)[c] and 2.5 μg/m^3 (operation) 1.0 μg/m^3	
$PM_{2.5}$ 24-hour average	10.4 μg/m^3 (construction)[c] and 2.5 μg/m^3 (operation)	
SO_2 1-hour average SO_2 24-hour average	0.25 ppm (State) and 0.075 ppm (Federal – 99th percentile) 0.04 ppm (State)	
Sulfates (SO_4) 24-hour average	25 μg/m^3 (State)	

Table 4.3-E
SCAQMD Air Quality Significance Thresholds

Criteria Pollutants Mass Daily Thresholds		
Pollutant	*Construction*	*Operation*
Ambient Air Quality for Criteria Pollutants[b]		
CO 1-hour average CO 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (State) and 35 ppm (Federal) 9.0 ppm (State/Federal)	
Lead 30-day average[a] Lead rolling 3-month average[a] Lead quarterly average[a]	1.5 µg/m^3 (State) 0.15 µg/m^3 (Federal) 1.5 µg/m^3 (Federal)	

Source: Air Quality and Greenhouse Gas Impact Analysis, LSA, December 2017.
lb/day = pounds per day; ppm = parts per million; µg/m^3 = microgram per cubic meter; ≥ = greater than or equal to
[a] The phasing out of leaded gasoline started in 1976; gasoline no longer contains lead.
[b] Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, Table A-2, unless otherwise stated.
[c] Ambient air quality threshold based on SCAQMD Rule 403.

The phasing out of leaded gasoline started in 1976. As gasoline no longer contains lead, vehicles used in construction and operation activities are not anticipated to emit lead.

The SCAQMD *CEQA Air Quality Handbook* also sets forth additional indicators of potential air quality impacts that should be used as screening criteria indicating the need for further analysis. The additional indicators are as follows:

- Project could interfere with the attainment of the federal or State ambient air quality standards by either violating or contributing to an existing or projected air quality violation.
- Project could result in population increases within the regional statistical area that would be in excess of that projected in the AQMP and in other than planned locations for the project's build-out year.
- Project would have the potential to create or be subjected to an objectionable odor over 10 dilutions to thresholds (D/T) that could impact sensitive receptors.[4]
- Project would have hazardous materials on-site and could result in an accidental release of air toxic emissions or acutely hazardous materials posing a threat to public health and safety.
- Project could emit an air toxic contaminant regulated by SCAQMD rules or that is on a federal or State air toxic list.

[4] This threshold would be applied to industrial and similar sources that would emit odorous substances, such as wastewater treatment plants and some chemical plants.

- Project could involve burning of hazardous, medical, or municipal waste as waste-to-energy facility.
- Project could be occupied by sensitive receptors within a quarter mile of an existing facility that emits air toxics identified in SCAQMD Rule 1401 or near CO hotspots.
- Project could emit carcinogenic or toxic air contaminants that individually or cumulatively exceed the maximum individual cancer risk of 10 in 1 million (SCAQMD 1993).

In addition to the above-listed emissions-based thresholds, the SCAQMD recommends the evaluation of localized air quality impacts to sensitive receptors in the immediate vicinity of the Project. Such an evaluation is referred to as a localized significance threshold (LST) analysis. LSTs are based on the ambient concentrations of pollutants within the Project Source Receptor Area (SRA) and the distance to the nearest sensitive receptor. LSTs represent the maximum emissions from a Project site that are not expected to result in an exceedance of the national or State AAQS. For this Project, the appropriate SRA for the localized impacts analysis is the Metropolitan Riverside County area (SRA 23).

In the case of CO and NO_2, if ambient levels are below the NAAQS and CAAQS a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a State or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$, both of which are nonattainment pollutants (SCAQMD 2006). For these two, the significance criteria are the pollutant concentration thresholds presented in SCAQMD Rules 403 and 1301. The Rule 403 threshold of 10.4 µg/m3 applies to construction emissions. The Rule 1301 threshold of 2.5 µg/m3 applies to operational activities.

Even if the total project site area is greater than 5 acres, if the total daily acreage disturbed is less than or equal to five acres per day, then the SCAQMD's screening look-up tables can be utilized to determine if a project has the potential to result in a significant construction impact. Based on the SCAQMD recommended methodology and the construction equipment planned, no more than 4 acres would be disturbed on any one day, thus the 2 and 5 acre thresholds have been interpolated to derive 4 acre LST thresholds for construction emissions. For operational emissions, the localized significance for a project greater than 5 acres can be determined by performing the screening-level analysis before using the dispersion modeling because the screening-level analysis is more conservative, and if no exceedance of the screening-level thresholds is identified then the chance of operational LSTs exceeding concentration standards is small.

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

Construction LST Thresholds, 4 acre, 82 foot (25-meter) distance

- 237 lbs/day of NO_x
- 1,346 lbs/day of CO
- 11 lbs/day of PM_{10}
- 7 lbs/day of $PM_{2.5}$

Operation LST Thresholds, 5-acre, 82-foot (25 meter) distance

- 270 lbs/day of NO_X
- 1,577 lbs/day of CO
- 4.0 lbs/day of PM_{10}
- 2.0 lbs/day of $PM_{2.5}$

4.3.4 Project Design Features

The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions. All future developments and major renovations to CBU will incorporate the following sustainable design elements, as they apply to reducing impacts to air quality, in accordance with the proposed CBUSP Amendment:

- Nonessential exterior lighting shall be turned off by automatic controllers from 11:00 P.M. to the following evening at dusk. Where feasible, essential lighting shall be equipped with occupancy-sensing controls to reduce power to provide lighting at minimum safety thresholds when areas are unoccupied. Lighting shall be ramped up to full power (based on zones) when motion is detected in the vicinity.
- New construction projects shall be designed to maximize daylight access for interior occupied spaces. Top lighting and side lighting strategies shall be combined to optimize daylight access for building occupants. Daylighting strategies to be investigated for feasibility include, but are not limited to exterior/interior light shelves, skylights and monitors, clerestory windows, tubular skylights, and light wells.

- Where feasible, waste heat recovery systems will be incorporated to capture heat from drainage water to pre-heat domestic water supplies.
- All new projects shall be designed to perform, at a minimum, per the 2016 Title 24 Energy Code base case.
- All new development and retrofit projects shall include opportunities for energy efficiency incentive funding through the Riverside Public Utilities Programs and Services.
- The installation and use of on-site renewable energy systems shall be investigated to reduce demand on existing energy grid infrastructure and to support the *City of Riverside Green Action Plan* goals.
- New development projects will incorporate high-efficiency mechanical systems as warranted. The University will investigate the potential for incorporation of highly efficient systems and passive or mixed mode (mechanical and natural ventilation) systems.
- The University will reduce energy consumption through ongoing monitoring and re/retro commissioning of building systems to ensure optimal operation.
- To achieve *City of Riverside Green Action Plan* goals, the University will consider introducing renewable energy such as photovoltaic and solar water heating into new construction projects and in the renovation of academic and residential facilities. Installations on roofs and inconspicuous areas can minimize the visual impact to the campus architecture while still providing energy offsets to essential areas within the campus.

4.3.5 Environmental Impacts Before Mitigation

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

The Project site is located within the Basin under the jurisdiction of the SCAQMD, which is the local agency responsible for administration and enforcement of air quality regulations for the area. Implementation of the Project would result in short-term construction and long-term operational pollutant emissions that have the potential to create or contribute to air quality impacts.

Projects are considered consistent with the AQMP if the growth in socioeconomic factors (e.g., population, employment) is consistent with the underlying regional plans used to develop the AQMP. The future emissions forecasts are primarily based on demographic and economic

growth projections provided by SCAG. Thus, demographic growth forecasts for various socioeconomic categories developed by SCAG for their 2016 RTP/SCS were used to estimate future emissions in the Final 2016 AQMP (SCAQMD 2016).

Pursuant to the methodology provided in Chapter 12 of the 1993 SCAQMD CEQA Air Quality Handbook, consistency with the Basin 2016 AQMP is affirmed when a project (1) does not increase the frequency or severity of an air quality standards violation or cause a new violation and (2) is consistent with the growth assumptions in the AQMP. Although the Project would generate short-term and long-term pollutant emissions, all emissions are less than the CEQA significance emissions thresholds established by SCAQMD. Therefore, the Project could not result in an increase in the frequency or severity of any air quality standards violation and will not cause a new air quality standard violation.[5]

The CEQA Air Quality Handbook indicates that consistency with AQMP growth assumptions must be analyzed for new or amended General Plan elements, Specific Plans, and significant projects. Significant projects include airports, electrical generating facilities, petroleum and gas refineries, designation of oil drilling district, water ports, solid waste disposal sites, and offshore drilling facilities. The proposed Project is not defined as a significant project. Because the Project's short-term and long-term pollutant emissions are lower than the CEQA significance threshold established by SCAQMD, and the proposed growth associated with CBU is anticipated in the SCAG growth forecasts. In the unlikely event all new students resulting from the proposed Project originate from outside the City, the forecast enrollment could increase the City's population by 3,578 persons (a 1.0 percent over 2017 estimates). For these reasons, the proposed Project is considered to be consistent with the AQMP resulting in a **less than significant** impact related to conflicts or obstruction of the applicable air quality plan. No mitigation is required.

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

The proposed Project will consist of an increase in student enrollment from 8,414 total students in 2015, to 12,000 total students by 2025 due to an expansion of curriculum offered at CBU. In order to accommodate the anticipated 30 percent increase in student enrollment by 2025, the University anticipates providing an additional 400,000 square feet of building area for academic, housing, recreational, and administrative purposes, and 805,000 square feet of parking structures.

In summary, the key assumptions used to estimate Project air pollution emissions during Project construction included the following:

[5] Air Quality and Greenhouse Gas Emissions Analysis, LSA, December 2017.

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

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

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

Regional Construction Emissions

Construction activities produce combustion emissions from various sources, such as demolition, grading, site preparation, utility engines, and motor vehicles transporting the construction crew. The use of construction equipment on site would result in localized exhaust emissions. In addition, fugitive dust (PM_{10} and $PM_{2.5}$) emissions would primarily result from grading and site preparation activities. Consistent with SCAQMD guidelines, the Project would not disturb more than five acres daily. Because emissions from demolition activities envisioned on-site would vary daily, the following analysis is based on peak-day emissions. Because the CBUSP Amendment is a planning program analyzed under this programmatic EIR, specific details regarding the location or type of future development that will result from implementation of the proposed Project are not known. General assumptions reflecting construction of a large structure on the University were used to generate construction related air pollutant emissions. These assumptions resulted in the mix of equipment and durations described in Table 4.3.F.

Table 4.3.F
Phase I Construction Equipment

Construction Phase	Equipment	Quantity	Hours/Day	Horsepower	Load Factor
Demolition	Concrete/industrial saws	1	8	81	0.73
	Excavators	3	8	158	0.38
	Rubber-tired dozers	2	8	247	0.40
Site Preparation	Rubber tired dozers	3	8	247	0.40
	Tractors/loaders/backhoe	4	8	97	0.37
Grading	Excavators	2	8	158	0.38
	Graders	1	8	187	0.41

Table 4.3.F
Phase I Construction Equipment

Construction Phase	Equipment	Quantity	Hours/Day	Horsepower	Load Factor
	Rubber-tired dozers	1	8	247	0.40
	Scrapers	2	8	367	0.48
	Tractors/loaders/backhoes	2	8	97	0.37
Building Construction	Cranes	1	7	231	0.29
	Forklifts	3	8	89	0.20
	Generator Sets	1	8	84	0.74
	Tractors/loaders/backhoes	3	7	97	0.37
	Welders	1	8	46	0.45
Paving	Pavers	2	8	130	0.42
	Paving equipment	2	8	132	0.36
	Rollers	2	8	80	0.38
Architectural Coatings	Air compressors	1	6	78	0.48

Source: Table G – Air Quality and Greenhouse Gas Emissions Analysis, LSA, December 2017.

The most recent version of the CalEEMod model (Version 2016.3.2) was used to calculate the construction emissions based on construction of a large structure. Required construction emission control measures, required by the SCAQMD and routinely implemented by construction contractors in the Basin, have been applied to the emissions rates show in Table 4.3.G. These control measures include compliance with regional rules that assist in reducing short-term air pollutant emissions. SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance at adjacent or off site locations. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. The California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program requires measures to promote recycling.

The applicable SCAQMD control measures are as follows:

- Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more).
- Water active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving).
- Cover all trucks hauling 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.

- Pave construction access roads at least 30 meters (100 feet) onto the site from the main road.
- Reduce traffic speeds on all unpaved roads to 15 miles per hour or less.

The applicable CalRecycle measures are:

- Recycle/reuse at least 50 percent of the construction material (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard).
- Use "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.

The emissions rates shown in the table are from the CalEEMod output tables listed as "Mitigated Construction," although the only measures that have been applied to the analysis are the construction emissions control measures, or standard conditions, required by SCAQMD. The emissions are the combination of the on- and off-site emissions.

Table 4.3.G
Project Estimated Maximum Daily Construction Emissions (pounds/day)

Construction Phase	Total Pollutant Emissions (lbs/day)					
	VOCs	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Demolition	4	38	23	0	3	2
Site Preparation	4	46	23	0	10	7
Grading	5	55	34	0	6	4
Building Construction	22	94	170	1	41	12
Paving	1	11	15	0	1	1
Architectural Coating	44	3	23	0	7	2
Maximum daily emissions	**44**	**94**	**170**	**1**	**41**	**12**
Regional threshold	***75***	***100***	***550***	***150***	***150***	***55***
Localized Significance Threshold	—	*237*	*1,346*	—	*11*	*7*
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Table H and I – Air Quality and Greenhouse Gas Emissions Analysis, LSA, December 2017.
Note: These estimates reflect control of fugitive dust required by SCAQMD Rule 403.
The values shown are the maximum summer or winter daily emissions results from CalEEMod.

CO = carbon monoxide
lbs/day = pounds per day
NO_X = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur oxides
VOC = volatile organic compounds

Table 4.3.G indicates that construction emissions would not exceed the daily thresholds of any criteria pollutant emission thresholds established by the SCAQMD. The Project's air pollutant emissions during on-site demolition activities and rough grading do not exceed any of the thresholds of significance established by the SCAQMD or other thresholds set forth in CEQA Appendix G. Project construction emissions will not generate substantial pollutant emissions or violate any air quality standards with implementation of the standard construction emission control measures discussed previously. However, in order to ensure these standard construction practices are followed, mitigation is required. **Mitigation Measures AQ-1** through **Mitigation Measure AQ-7** would reduce construction air pollution emissions to the levels shown in Table 4.3.G. Therefore, Project construction air quality impacts are considered **less than significant with mitigation incorporated**.

Operational Emissions

Long-term air pollutant emissions impacts are those associated with stationary sources and mobile sources involving project-related changes. The proposed Project would result in net increases in both stationary- and mobile-source emissions. The stationary-source emissions would come from many sources, including the use of consumer products, landscaping equipment, general energy, and solid waste.

Based on the Traffic Impact Analysis (Rick Engineering September 2018), for year 2025, the CBU Campus is anticipated to generate 17,280 average daily trips (ADT), representing an increase of 5,291 daily trips over existing conditions.

The proposed Project is required to comply with Title 24 of the California Code of Regulations established by the California Energy Commission regarding energy conservation and green building standards. In accordance with Title 24, various energy efficiency, renewable energy, water conservation, solid waste reduction, transportation and motor vehicle, on-site equipment and loading docks, and construction measures into the construction and operation each increment of development resulting from the proposed Project.

The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions. All future developments and major renovations to CBU will incorporate the following sustainable design elements, as they apply to reducing impacts to air quality:

- Nonessential exterior lighting shall be turned off by automatic controllers from 11:00 P.M. to the following evening at dusk. Where feasible, essential lighting shall be equipped with occupancy-sensing controls to reduce power to provide lighting at minimum safety thresholds when areas are unoccupied. Lighting shall be ramped up to full power (based on zones) when motion is detected in the vicinity.

- New construction projects shall be designed to maximize daylight access for interior occupied spaces. Top lighting and side lighting strategies shall be combined to optimize daylight access for building occupants. Daylighting strategies to be investigated for feasibility include, but are not limited to exterior/interior light shelves, skylights and monitors, clerestory windows, tubular skylights, and light wells.
- Where feasible, waste heat recovery systems will be incorporated to capture heat from drainage water to pre-heat domestic water supplies.
- All new projects shall be designed to perform, at a minimum, per the 2016 Title 24 Energy Code base case.
- All new development and retrofit projects shall include opportunities for energy efficiency incentive funding through the Riverside Public Utilities Programs and Services.
- The installation and use of on-site renewable energy systems shall be investigated to reduce demand on existing energy grid infrastructure and to support the City of Riverside Green Action Plan goals.
- New development projects will incorporate high-efficiency mechanical systems as warranted. The University will investigate the potential for incorporation of highly efficient systems and passive or mixed mode (mechanical and natural ventilation) systems.
- The University will reduce energy consumption through ongoing monitoring and re/retro commissioning of building systems to ensure optimal operation.
- To achieve City of Riverside Green Action Plan goals, the University will consider introducing renewable energy such as photovoltaic and solar water heating into new construction projects and in the renovation of academic and residential facilities. Installations on roofs and inconspicuous areas can minimize the visual impact to the campus architecture while still providing energy offsets to essential areas within the campus.

Area sources include architectural coatings, consumer products, hearth, and landscaping. Energy sources include natural gas consumption for heating and cooking. Mobile sources include all vehicular trips associated with students, facility, administrative staff, and deliveries. Table 4.3.H presents the operational emissions estimated for the proposed Project. As provided in Table 4.3.H, none of the criteria pollutants would exceed SCAQMD emission thresholds during operation/occupation of the Project; therefore, Project-related long-term air quality impacts would be **less than significant**. No mitigation is required.

Table 4.3.H
Regional Operational Emissions

Source	Pollutant Emissions, lbs/day					
	VOC	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	19	4	328	<1	2	2
Energy	2	16	7	<1	1	1
Mobile	17	23	154	<1	34	9
Total Project Emissions	**38**	**42**	**488**	**0**	**37**	**12**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Localized Significance Threshold	**---**	**270**	**1,577**	**---**	**4**	**2**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: Table J and K – Air Quality and Greenhouse Gas Emissions Analysis, LSA, December 2017.

CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
SCAQMD = South Coast Air Quality Management District
SO_2 = sulfur oxides
VOC = volatile organic compounds

As shown in Table 4.3.H, none of the criteria pollutants would exceed SCAQMD emissions thresholds during operation/occupation of the Project. Project operational emissions will not generate substantial pollutant emissions or violate any air quality standards with implementation of the sustainable design elements discussed previously. However, in order to ensure these sustainable design elements are followed, mitigation is required. **Mitigation Measures AQ-8** through **Mitigation Measure AQ-10** would reduce operational air pollution emissions to the levels shown in Table 4.3.H. Therefore, Project-related operational (long-term) air quality impacts would be **less than significant with mitigation incorporated**.

Threshold C: Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

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

The Basin has been designated as Federal nonattainment area for O_3 and $PM_{2.5}$ and a State nonattainment area for O_3, NO_2, PM_{10}, and $PM_{2.5}$. PM_{10} and $PM_{2.5}$ emissions associated with construction generally result in near-field impacts. The nonattainment status is the result of cumulative emissions from all sources of these air pollutants and their precursors within the Basin.

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

As discussed above, the Project would not emit any criteria air pollutants above regional significance thresholds. The Project has also been determined to be consistent with the AQMP, since it is consistent with the underlying land use as determined by the CBUSP. Because the cumulative projects considered in this EIR (see Figure 6-1) are not adjacent to the CBU Campus, it is not anticipated that other projects would be constructed and in operation in the vicinity of the Project whose emissions would comingle with the proposed Project. For this reason, the proposed Project would not result in a cumulatively considerable impact associated with regional emissions. Therefore, the Project would not have a cumulatively considerable contribution to nonattainment status in the Basin. Operational impacts are cumulatively **less than significant**. No mitigation is required.

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

Localized Significance Thresholds Analysis

Sensitive receptors are those more susceptible to the effects of air pollution than are the population at large. The SCAQMD considers that sensitive receptors may include residences, schools, playgrounds, childcare centers, long-term healthcare facilities, rehabilitation centers, convalescent centers, and retirement homes (SCAQMD 1993). The nearest sensitive receptors to the Project site are existing on-campus student housing, as well as existing single-family and multi-family residences located adjacent to the properties within the CBUSP Planning Area (i.e., CBUSP-1 and CBUSP-2 subareas), some of which are between 10 and 25 feet from select CBU properties. Additional receptors include a church (Seventh Day Adventist), middle school

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

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

The nearest sensitive receptors to the Project site are existing on-campus student housing and academic facilities on the Project site itself, as well as existing single-family and multi-family residences located adjacent to the properties within the CBUSP Planning Area (i.e., CBUSP-1 and CBUSP-2 subareas), some of which are between 10 and 25 feet from select CBU properties. SCAQMD LST Methodology (SCAQMD 2003) specifies "Projects with boundaries located closer than 25 meters to the nearest receptor should use the LSTs for receptors located at 25 meters." The results are shown in Tables 4.3.I and 4.3.J for construction and operational impacts, respectively.

Table 4.3.I
Construction Localized Impact Analysis

Construction Source	Onsite Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Construction Equipment	55	33	11	**7**
LST Thresholds	237	1,346	11	**7**
Significant Emissions?	No	No	No	**No**

Source: Table I – Air Quality and Greenhouse Gas Emissions Analysis, LSA, December 2017.

Note: Source Receptor Area – Metropolitan Riverside County area, 5-acre, 82-foot distance, on-site traffic 5 percent of total.

CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance thresholds
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

Table 4.3.J
Operational Localized Impact Analysis

Construction Source	Onsite Emissions (lbs/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
On-site Emissions	5	335	4	**2**
LST Thresholds	270	1,577	4	**2**
Significant Emissions?	No	No	No	**No**

Source: Table K – Air Quality and Greenhouse Gas Emissions Analysis, LSA, December 2017.

Note: Source Receptor Area – Metropolitan Riverside County area, 5-acre, 82-foot distance, on-site traffic 5 percent of total.

CO = carbon monoxide
lbs/day = pounds per day
LST = localized significance thresholds
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size

As indicated in Tables 4.3.I and 4.3.J, all criteria pollutants from the Project would be below localized significance thresholds for construction and operations with implementation of **Mitigation Measures AQ-1** through **AQ-10**. LSTs were established in order to protect the health of sensitive receptors. As the Project will generate emissions below LST criteria, it would not have a significant impact to human health. Therefore, with implementation of mitigation, the Project would not contribute to significant localized emissions of criteria air pollutants during both construction and operations. Localized ambient air quality impacts are **less than significant with mitigation**.

Carbon Monoxide Hotspots

Vehicular trips associated with the proposed Project would contribute to congestion at intersections and along roadway segments in the Project vicinity. Localized air quality impacts would occur when emissions from vehicular traffic increase as a result of the proposed Project. The primary mobile-source pollutant of local concern is CO, a direct function of vehicle idling time and, thus, of traffic flow conditions. CO transport is extremely limited; under normal meteorological conditions, CO disperses rapidly with distance from the source. However, under certain extreme meteorological conditions, CO concentrations near a congested roadway or intersection may reach unhealthful levels, affecting local sensitive receptors (e.g., residents, school children, the elderly, and hospital patients).

Typically, high CO concentrations are associated with roadways or intersections operating at unacceptable levels of service (LOS) E or worse, or with extremely high traffic volumes. In areas with high ambient background CO concentrations, modeling is recommended, to determine a project's effect on local CO levels.

When the SCAQMD CEQA Air Quality Handbook (SCAQMD 1993) was published, the Basin was designated nonattainment under the CAAQS and NAAQS for CO. With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology on industrial facilities, CO concentrations in the Basin have steadily declined. In 2007, the Basin was redesignated as attainment for CO under both the CAAQS and NAAQS. As identified within SCAQMD's 2003 AQMP (SCAQMD 2003) and the 2005 Carbon Monoxide Resignation Request and Maintenance Plan (SCAQMD 2005), peak carbon monoxide concentrations in the Basin were a result of unusual meteorological and topographical conditions and not a result of congestion at a particular intersection.

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

As described in the California Baptist University Traffic Impact Analysis (Rick Engineering, September 2018) prepared for the proposed Project, all study area intersections currently operate at satisfactory LOS with the exception of the Adams Street/SR-91 Eastbound ramps intersections currently operating at LOS E during the p.m. peak hour. Intersections operating at higher LOS levels mean vehicles spend more time idling, thus causing higher CO emissions. With addition of the Project in the existing condition with recommended improvements, all study area intersections would operate at satisfactory LOS with the exception of LOS F at the Adams Street/SR-91 Eastbound ramps. An independent CO hot spot analysis was conducted at four intersections in Los Angeles County that are much busier than any in the Project vicinity at the peak morning and afternoon periods and none were predicted to violate any CO standards.[6]

Therefore, the Project can be implemented with no significant CO hot spot impacts created by peak-hour intersection congestion. Given the extremely low level of CO concentrations in the Project area, and no substantial Project-traffic related impacts at any intersections, project-related vehicle emissions are not expected to result in the CO concentrations exceeding the

[6] The four intersections were Long Beach Boulevard/Imperial Highway; Wilshire Boulevard/Veteran Avenue; Sunset Boulevard/Highland Avenue; and La Cienega Boulevard/Century Boulevard. The busiest intersection evaluated (Wilshire Boulevard/Veteran Avenue) had a daily traffic volume of approximately 100,000 vehicles and LOS E in the morning peak hour and LOS F in the evening peak hour.

State or federal CO standards. Impacts associated with CO concentrations are considered **less than significant**. No mitigation is required.

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

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

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

4.3.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires DEIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measures have been evaluated for feasibility and are incorporated in order to reduce potentially significant air quality impacts.

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

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

MM-AQ-3: All project construction plans shall include a specification requiring the covering of all haul trucks transporting dirt, sand, soil, or other loose materials, or maintain at least 0.6 meters (2 feet) of freeboard (vertical space between the top of the load

and top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114.

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

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

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

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

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

- 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 equipment.

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

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

- 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.

4.3.7 Environmental Impacts After Mitigation Is Incorporated

Air Quality impacts can be mitigated to less than significant levels by incorporating mitigation measures MM-AQ-1 through MM-AQ-10 as described in Section 4.3.6. No significant impacts would remain after mitigation.

4.3.8 References

14 CCR 15000–15387 and

dices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Air Resources Board (ARB). 2009. *ARB Fact Sheet: Air Pollution and Health.* http://www.arb.ca.gov/research/health/fs/fs1/fs1.htm, accessed December 2017.

ARB. *iADAM: Air Quality Data Statistics.* www.arb.ca.gov/adam/index.html, accessed December 2017.

LSA, Air Quality and Greenhouse Gas Emissions Analysis, California Baptist University, December 2017.

Rick Engineering Company, Traffic Impact Analysis, California Baptist University, September 2018.

South Coast Air Quality Management District (SCAQMD). 2017. CEQA Air Quality Handbook website: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook, accessed December 2017.

———, 2016. Final 2016 Air Quality Management Plan. February. Website: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp, accessed December 2017.

———, 2010. Minutes for the GHG CEQA Significance Threshold Stakeholder Working Group No. 15. September 28. Website: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-15/ghg-meeting-15-minutes.pdf, accessed December 2017.

United States Environmental Protection Agency (EPA). *Air Quality Data.* https://www.epa.gov/outdoor-air-quality-data, accessed December 2017.

4.4 BIOLOGICAL RESOURCES

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential impacts to biological resources. The EIR will evaluate the potential impacts related to listed species, riparian and/or sensitive habitats, wetlands, wildlife movement, local policies or ordinances related to biological resources and habitat conservation plans, resulting from implementation of the proposed Project. No written comments regarding biological resources were received in response to the NOP. The analysis contained in this section is based upon the following report:

- *Biological Resources Assessment on California Baptist University Campus, California Baptist University Specific Plan Update. LSA*, April 19, 2018 (EIR Appendix C).

4.4.1 Setting

The approximately 167-acre CBU Specific Plan Zone (CBUSP Subarea-1 and Subarea-2) is located in the City of Riverside and surrounded by existing urban uses. Land uses surrounding the CBU Specific Plan Zone include single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; single-family and multi-family residential, commercial, and school uses to the west; and State Route 91 freeway, multi-family residential, church, school, and commercial uses to the south.

The entire CBU Specific Plan Zone has been previously graded and generally slopes from south to north, with an approximate elevation range between 770 and 830 feet above mean sea level. The natural topography of the regional area consists of valley lowland intersected by rolling hills and surrounded by mountain ranges. Most of the regional area has been developed or disturbed, and the nearest remaining large areas of native habitats occur along the Santa Ana River and the hills of Alessandro Heights two miles to the north and south, respectively.

Five soil types are mapped at the Project site: Arlington fine sandy loam, deep, with 2 to 8 percent slopes; Arlington loam, deep, with 0 to 5 percent slopes; Hanford coarse sandy loam with 0 to 2 percent slopes; Hanford fine sandy loam with 0 to 2 percent slopes; and Buchenau loam, slightly saline-alkali, with 0 to 2 percent slopes.[1] However, due to on-site development, the site may contain fill that is inconsistent with the mapped soils.

The latitude and longitude of the approximate center of the site is 33°55'41.50"N and 117°25'32.32"W. The site is within Sections 5 and 8 of Township 3 South, Range 5 West of the

[1] Web Soil Survey. U.S. Department of Agriculture, Natural Resources Conservation Service. 2013. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx (Accessed August 23, 2017).

Riverside West, California 7.5-minute quadrangle, San Bernardino Baseline and Meridian, as mapped by the U.S. Geological Survey (USGS).

Existing Conditions

The proposed Project site is developed with the CBU Campus. The site contains improvements consisting of academic and student housing, buildings, paved parking lots, grassy athletic fields and open space lawns, a water quality detention basin, concrete walkways, ornamental landscaping, and roadways. Total vegetation cover on the Project site is approximately 15 percent consisting of grassy athletic fields and open space lawns, ornamental trees, shrubs, and planters, and a constructed storm water detention basin with potential to support riparian/riverine resources (previously referenced Figure 2-7 and Figure 4.4-1). However, minimal native vegetation remains within the Project site or surrounding properties.

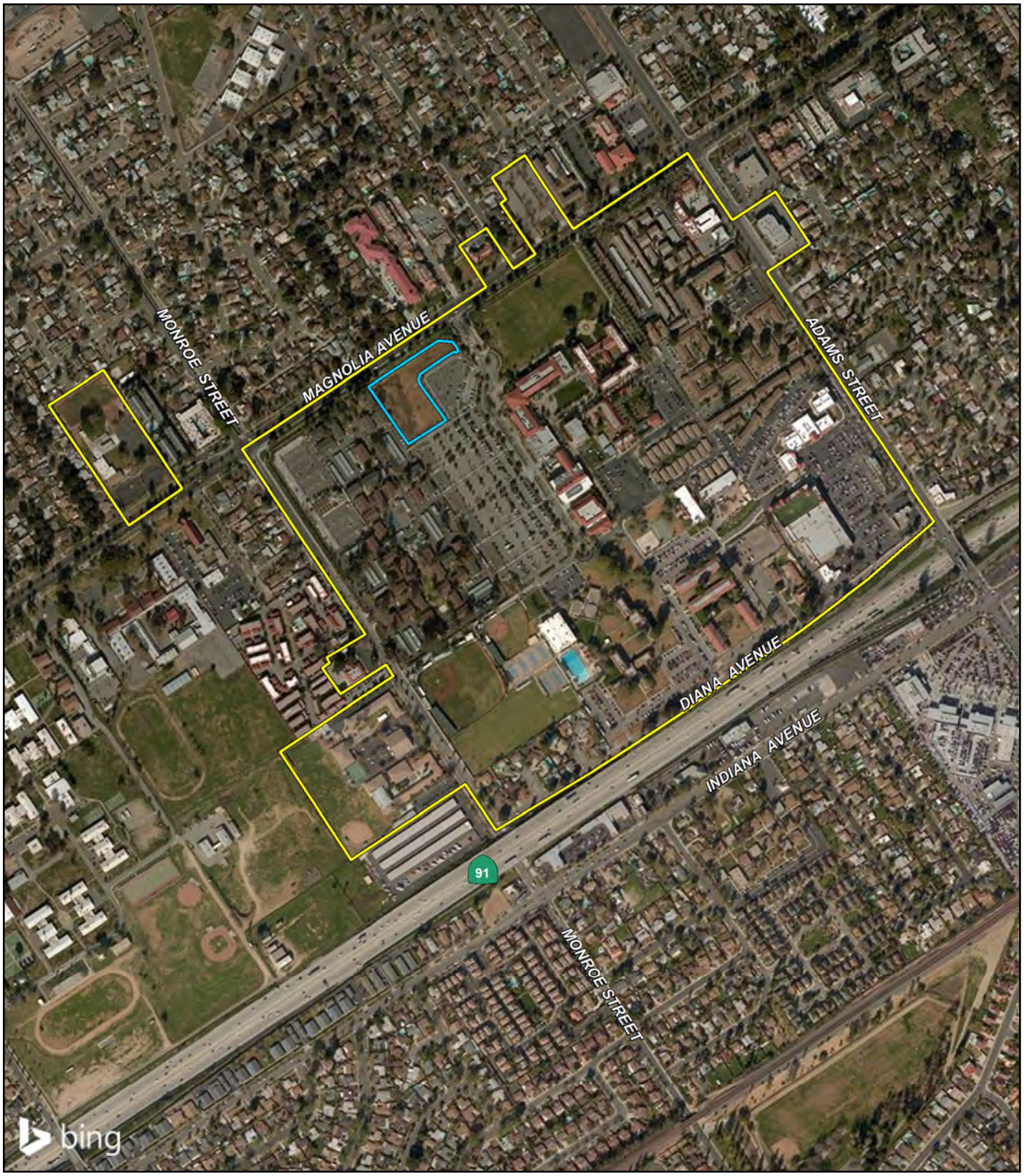
The Project site is located within the Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP) area. The City is a Permittee to the MSHCP; therefore, the proposed Project is required to comply with applicable provisions of the MSHCP. Additionally, the Project is within the Stephens Kangaroo Rat Habitat Conservation Plan (SKRHCP) mitigation fee area; therefore, the proposed Project is required to comply with applicable provisions of the SKRHCP (See Section 4.4.2, Local Regulations, below).

4.4.2 Related Regulations

Federal Regulations

Federal Endangered Species Act of 1973. The Federal Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.) and subsequent amendments (FESA), provide for the conservation of endangered and threatened species and the habitats on which they depend. A federally endangered species is one facing extinction throughout all or a significant portion of its geographical range. A federally threatened species is one likely to become endangered within the foreseeable future throughout all or a significant portion of its range. The presence of any federally threatened or endangered species on a site generally imposes severe constraints on development; particularly if development would result in a "take" of the species or its habitat. The term "take" means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct. Harm in this sense can include any disturbance to habitats used by the species during any portion of its life history. The proposed Project is fully developed and lacks listed plants and habitat able to support listed wildlife species.

Clean Water Act. The United States Army Corps of Engineers (USACE) regulates discharges of dredged or fill material into waters of the United States. These waters include wetlands and non-wetland bodies of water that meet specific criteria, including a direct or indirect connection



LSA

LEGEND

CBU Specific Plan Zone

Stormwater Detention Basin

N

0 350 700

FEET

SOURCE: Bing Aerial, 2015.

FIGURE 4.4-1

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Existing On-site Detention Basin

I:\CTR1501\Reports\EIR\fig4-4-1_DetentionBasin.mxd (8/16/2018)

THIS PAGE INTENTIONALLY LEFT BLANK

to interstate commerce. The USACE regulatory jurisdiction pursuant to Section 404 of the Federal Clean Water Act (CWA) is founded on a connection, or nexus, between the water body in question and interstate commerce. This connection may be direct (through a tributary system linking a stream channel with traditional navigable waters used in interstate or foreign commerce) or may be indirect (through a nexus identified in the USACE regulations). The USACE typically regulates as non-wetland waters of the U.S. any body of water displaying an ordinary high water mark. In order to be considered a jurisdictional wetland under Section 404, an area must possess three wetland characteristics: hydrophytic vegetation, hydric soils, and wetland hydrology. Each characteristic has a specific set of mandatory wetland criteria that must be satisfied in order for that particular wetland characteristic to be met.

In 2006, the United States Supreme Court in the consolidated cases *Rapanos v. United States* and *Caravell v. United States*, Nos. 04-1034 and 04-1384 (*Rapanos*: June 19, 2006) addressed CWA jurisdiction over wetlands adjacent or abutting navigable, non-navigable and ephemeral tributaries and jurisdiction over permanent and relatively permanent non-navigable tributaries. According to the United Sates Supreme Court, the CWA does not assert jurisdiction over upland erosional features, gullies, and roadside ditches that have infrequent, low volume, and short duration of water flow. The USACE uses a significant nexus analysis. A water body is considered to have a "significant nexus" with a traditional navigable water (TNW)[2] if its flow characteristics and functions in combination with the ecologic and hydrologic functions performed by all wetlands adjacent to such a tributary, affect the chemical, physical, and biological integrity of a downstream traditional navigable water. Additional information is provided in the Environmental Protection Agency (EPA) memorandum titled "Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in *Rapanos v. United States* & *Caravell v. United States*,"[3] and also the *U.S. Army Corps of Engineers Jurisdictional Determination Form Instructional Guidebook.*[4]

The Regional Water Quality Control Board (RWQCB) is responsible for the administration of Section 401 of the CWA through water quality certification of any activity that may result in a discharge to jurisdictional waters of the U.S. The RWQCB may also regulate discharges to "waters of the State," including wetlands, under the California Porter-Cologne Water Quality Control Act. There is currently no approved guidance for delineating areas potentially subject to

[2] A "traditional navigable water" includes all of the "navigable waters of the United States," defined in 33 C.F.R. § 329 and by numerous decisions of the Federal courts, plus all other waters that are navigable-in-fact.

[3] Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in Rapanos v. United States & Caravell v. United States. June 6, 2007 and revised December 2, 2008. https://www.epa.gov/sites/production/files/2016-02/documents/cwa_jurisdiction_following_rapanos120208.pdf. (Accessed August 24, 2017).

[4] U.S. Army Corps of Engineers Jurisdictional Determination Form Instructional Guidebook. http://www.usace.army.mil/Portals/2/docs/civilworks/regulatory/cwa_guide/jd_guidebook_051207final.pdf. (Accessed August 24, 2017).

RWQCB jurisdiction. Generally, areas subject to RWQCB regulation are typically determined to coincide with areas subject to USACE jurisdiction, as recommended by the RWQCB's September 2004 Workplan.[5]

Migratory Bird Treaty Act. According to the Migratory Bird Treaty Act (MBTA) administered by the United States Fish and Wildlife Service (USFWS), the removal of active nests, eggs, or nestlings is unlawful. A violation of the MBTA may occur on, but is not limited to, projects that involve clearing or grubbing of migratory bird nest habitat during the nesting season, and demolition or reconstruction where bird nests are present. The nesting season time period is especially important due to the heightened presence of eggs or young that are essential to the survival of the species. The proposed Project will comply with the MBTA and Fish and Game Code by recommending pre-construction nesting bird surveys if habitat removal is proposed during the nesting season and implementing avoidance measures if active nests are identified in the Project area.

State Regulations

California Endangered Species Act (CESA). California (Fish and Game Code 2050 et seq.) establishes that it is the policy of the State to conserve, protect, restore, and enhance threatened or endangered species and their habitats. CESA mandates that State agencies should not approve projects that would jeopardize the continued existence of threatened or endangered species if reasonable and prudent alternatives are available that would avoid jeopardy. CESA requires State lead agencies to consult with the California Department of Fish and Wildlife (CDFW) during the CEQA process to avoid jeopardy to threatened or endangered species. CESA prohibits any person from taking or attempting to take a species listed as endangered or threatened (Fish and Game Code Section 2080). Section 2080 of the Fish and Game Code provides the permitting structure for CESA. The "take" of a State-listed endangered or threatened species or candidate species will require incidental take permits as authorized by the CDFW.

The proposed Project, however, is not expected to require such authorizations since it is not expected to result in "take" of a listed species. The proposed Project is fully developed and lacks listed plants and habitat able to support listed wildlife species.

California Fish and Game Code. Various sections of the California Fish and Game Code provide protection to nesting birds, birds of prey, and species protected under the MBTA. Section 3503 of the California Fish and Game Code prohibits the destruction of the nest or eggs of any bird as otherwise provided for in the Fish and Game Code. Section 3503.5 specifically

[5] Workplan: Filling the Gaps in Wetland Protection. 2004. State Water Resources Control Board. https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/wrkplan_filing_gaps_wet_prot_9_24_04.pdf. (Accessed August 24, 2017).

extends this protection to the nests or eggs of any bird of prey (species of the Orders *Falconiformes* [falcons, hawks, eagles, ospreys] *or Strigiformes* [owls]). The unlawful take, sale, or purchase (whole or in part) of any aigrette or egret, osprey, bird of paradise, goura, or numidi is prohibited under Section 3505. Section 3513 prohibits the unlawful to take or possession of any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

Native Plant Protection Act (NPPA). Sections 1900–1913 of the California Fish and Game Code (Native Plant Protection Act) direct the CDFW to carry out the Legislature's intent to "… preserve, protect and enhance endangered or rare native plants of this state." The NPPA gives the California Fish and Game Commission the power to designate native plants as "endangered" or "rare" and protect endangered and rare plants from take.

Local Regulations

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). To address regional biological resources and habitat sustainability, the MSHCP was developed in 2001 by the County of Riverside in cooperation with State and federal agencies. The MSHCP applies to unincorporated and incorporated Riverside County land, excluding Native American tribal land, west of the crest of the San Jacinto Mountains to the Orange County line. It applies to a total area of approximately 1.26 million acres (approximately 1,997 square miles) and is one of the largest conservation plans in the U.S. The MSHCP covers multiple species and multiple habitats within multiple jurisdictions.

The MSHCP was conceived, developed, and is being implemented specifically to address the direct, indirect, cumulative, and growth-related effects on covered species resulting from build out of planned land use and infrastructure, including the proposed CBUSP Amendment. The MSHCP involves efforts by the County, State, and federal governments, the fourteen cities in western Riverside County, and private and public entities engaged in construction activities that potentially affect the species covered under the MSHCP. The plan specifies an obligation of local projects, both public and private, to mitigate their impacts on species. The MSHCP includes incentives for conservation or the purchase of properties from willing sellers and will eventually result in a Conservation Area in excess of 500,000 acres, focusing on conservation of 146 species. The MSHCP Conservation Area includes approximately 347,000 acres of existing Public/Quasi-Public Lands and approximately 153,000 acres of Additional Reserve Land.

The MSHCP Conservation Area is made up of existing and proposed "Core" areas, or large assemblages of public land that contain important habitat and listed or sensitive species populations. The core areas are connected by a series of "linkages" or "corridors" identified across public and private lands to allow wildlife movement and genetic connectivity and

diversity among the core areas. The MSHCP identifies conservation areas through a series of "criteria cells" within which certain biological resources (i.e., vegetation and/or physical features) should be preserved over the long term. The MSHCP also establishes various processes to evaluate land development proposals in light of its goals and requirements. The MSHCP also identifies when studies need to be performed within certain criteria cells to determine the presence or absence of listed or otherwise sensitive species of plants or animals. In accordance with the CESA, the MSHCP establishes a mitigation strategy based on establishment of reserves for species listed under the MSHCP aided by a per-acre mitigation fee levied by the City pursuant to Ordinance No. 6709 of the City Municipal Code[6] and by Riverside County pursuant to Ordinance No. 810.2.[7]

Stephen's Kangaroo Rat Habitat Conservation Plan (SKR-HCP). The City is located within the boundary of the adopted Habitat Conservation Plan (HCP) for the endangered Stephens' kangaroo rat (SKR-HCP) administered by the Riverside County Habitat Conservation Agency (RCHCA). The SKR-HCP mitigates impacts from development on the SKR by establishing a network of preserves and a system for managing and monitoring them. The SKR-HCP initially established Core Reserves for the conservation of key SKR populations. Outside of the Core Reserves, the SKR-HCP established a fee assessment area by which individual projects are granted coverage under the HCP by payment of SKR fees. The MSHCP, through its goals for SKR, reaffirms the conservation goals of the SKR-HCP, while expanding the coverage area outside of the original coverage boundaries of the SKR-HCP. Neither the SKR-HCP nor MSHCP requires project-specific SKR surveys for sites located outside of the existing Core Reserves. Instead, payments of SKR fees are sufficient to obtain take authorization for SKR, unless specific lands are targeted for conservation by SKR-HCP or MSHCP. The City's SKR fees are required to be paid at the time of grading permit issuance, pursuant to Riverside Municipal Code Section 16.40.040.

Urban Forestry Policy Manual. The City's Urban Forestry Policy Manual is a guideline for the planting, pruning, preservation and removal of all trees in the City rights-of-way and recreational facilities. The manual does not apply to trees located on private property. The specifications in the Riverside Urban Forestry Policy Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. If implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department

[6] Western Riverside Multiple Species Habitat Conservation Plan Fee Program, Chapter 16.72. City of Riverside Municipal Code. https://www.riversideca.gov/municode/pdf/16/16-72.pdf (Accessed August 23, 2017.

[7] Ordinance No. 810.2.County of Riverside. http://www.rivcocob.org/ords/800/810.htm (Accessed August 23, 2017).

would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual.

City of Riverside General Plan 2025. The Riverside General Plan 2025 Environmental Impact Report outlines several General Plan goals and policies pertaining to biological resources throughout the City.[8] However, most of these policies do not pertain to the proposed Project because of the developed nature of the CBU Specific Plan Zone and general lack of biological resources (i.e. natural habitat, native plant communities, arroyos, hillsides, agricultural uses, wildlife/endangered species, etc.) on or near the Project site.

The following policies pertaining to biological resources are obtained from the City's General Plan 2025 and are applicable to the proposed Project. Although listed here, each of these policies are presented in Table 4.10-1 of the Land Use and Planning Section of the EIR with an evaluation of the Project's consistency with the stated policies.

Open Space and Conservation Policies

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

Policy OS-5.3: Continue to participate in the Stephens' Kangaroo Rat (SKR) Habitat Conservation Plan including collection of mitigation fees.

Policy OS-6.3 Preserve the integrity of Riverside's arroyos and riparian habitat areas through the preservation of native plants.

Historic Preservation Policies

Policy HP-1.4 The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

4.4.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on biological resources if the proposed Project would:

[8] Section 5.4-Biological Resources, City of Riverside General Plan and Supporting Documents Environmental Impact Report. Pages 5.4-32 to 5.2-37. City of Riverside. December 2007.

- (Threshold A) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- (Threshold B) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service;
- (Threshold C) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
- (Threshold D) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites;
- (Threshold E) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- (Threshold F) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.

Methodology

The Project site was assessed via the Western Riverside County Regional Conservation Authority Summary Report Generator[9] to determine consistency with the requirements of the SKR-HCP and MSHCP including Criteria Cells; Conservation Areas and wildlife movement corridors and linkages; Criteria Area Species Survey Areas (CASSA) for plant, bird, mammal, and amphibian species; Narrow Endemic Plants Survey Areas (NEPSSA); and survey requirements for inadequately covered species. A biological resource assessment was prepared to determine suitable habitat for the western burrowing owl as well as surveying the detention basin for potential resources of concern to the CDFW and a nexus for U.S. Army Corps of Engineers (USACE) jurisdiction under Federal Clean Water Act Section 404.[10]

[9] Summary Report Generator. Western Riverside County Regional Conservation Authority. https://www.wrc-rca.org/rcamaps/conservation-summary-report-generator/ (Accessed August 24, 2017).

[10] Biological Resources Assessment, LSA, September 12, 2017.

4.4.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through the design. The proposed CBUSP Amendment outlines design elements that guide development to be sensitive to biological resources.

Specific Plan Amendment Design Elements

Chapter 5 of the proposed CBUSP Amendment provides specific design elements to guide the architectural, landscape, site furnishing, streetscape, entrance and corner, fence and wall, open space, lighting, signage, and campus art design to ensure a cohesive, aesthetically pleasing, and safe campus in accordance with the CBUSP Amendment objectives and policies.[11] For the CBU Specific Plan Zone, these design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*.

Landscape design will be implemented to achieve unification encompassing the entire campus area while respecting the area's historic context. Continuity is achieved through the use of hardscape materials, plant materials, and planting character arranged in various scales and intensities. The landscape design guidelines in this section apply to all new construction, infill, and edge development within the CBU Specific Plan Zone. CBU has also developed the CBU Tree Campus USA Urban Forest Management Guidelines to manage landscaping within the campus.

Streetscape design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces.

Specific Plan Amendment Implementation Methods

Chapter 8 of the proposed CBUSP Amendment provides methods, programs, and financing mechanisms to be used to implement the objectives, policies, development standards, and design elements in the CBUSP.[12] CBU serves as the responsible party, meaning the University's Finance and Administration Department or other department as designated by the Finance and Administration Department, and the implementation timeframe will be ongoing as individual projects are proposed throughout the 2025 horizon of the Specific Plan. These implementation

[11] *California Baptist University Specific Plan Amendment, Public Review Draft,* Chapter 7, Section C. Section E, Subsection 1. City of Riverside. August 2018.

[12] *California Baptist University Specific Plan Amendment, Public Review Draft,* Chapter 8, Section A. City of Riverside. August 2018.

methods serve as self-mitigating project design features required for all future development and improvement projects to or in proximity to biological resources.

Hawthorne House & Eucalyptus Tree is a designated City Landmark dating to the late 19th Century. The Eucalyptus tree is located in an adjacent parcel to the south but has been determined contemporaneous and associated with the Hawthorne House. CBU is required to assess the health and stability of the tree. If the tree is found stable and healthy, CBU shall:

- Care and maintain the tree in its campus landscape program;
- Incorporate the tree in situ into all future proposed projects for this site;
- Design nearby additions/alterations or roadway improvements to avoid or limit disturbance to the tree such as nearby excavation/grading; and
- If necessary, realign the existing roadway or convert the drive to a pedestrian pathway or open space area/network to accommodate the tree.
- If the tree is found unstable or unhealthy, or if the tree dies of natural causes or an act of God, the tree will be removed pursuant to City staff review and direction.

Green Space. The existing green space and geometrically patterned turf-walkway alignment between and among the gym, dormitories and current athletic bungalows shall be preserved to the extent possible and emulated, where appropriate, in new development. Additions, alterations, and new construction to the dormitories, expansion of Lots 6 and 7, and the realignment of Campus Drive shall be designed to incorporate retention of green space, maintain geometric pattern of concrete walkways and lawn around and among the buildings, and minimize removal of mature trees.

4.4.5 Environmental Impacts Before Mitigation

Threshold A: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The vast majority of vegetation on the Project site consists of ornamental landscaping, and the Project area is fully developed with university and associated facilities and completely surrounded by urban development. Therefore, no suitable habitat exists for species identified as a candidate, sensitive, or special-status species occur on the Project site. A search of the MSHCP database and other appropriate databases identified no potential for candidate, sensitive, or special status species; suitable habitat for such species on site; Federal Species of Concern; California Species of Special Concern; and California Species Animal or Plants on lists 1-4 of

the California Native Plant Society (CNPS) Inventory.[13,14] However, trees and shrubs on site may provide nesting habitat for nesting birds. Therefore, future development on the Project site facilitated by implementation of the proposed Project may have direct and indirect effects to migratory birds. Direct effects may result from the removal and destruction of nesting bird habitat (e.g., trees and shrubs), and indirect effects may result from increased noise and human presence during construction activities that may cause birds to abandon nests or that may negatively affect nestlings.

Common native urban bird species that may nest in ornamental landscaping include lesser goldfinch (*Spinus psaltria*), Brewer's blackbird (*Euphagus cyanocephalus*), northern mockingbird (*Mimus polyglottos*), common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*), Anna's hummingbird (*Calypte anna*), house finch (*Carpodacus mexicanus*), and hooded oriole (*Icterus cucullatus*). In addition, there is reasonable potential for existing and future buildings to support nesting opportunities for native birds that are common in urbanized areas, such as American kestrel (*Falco sparverius*), house finch (*Haemorhous mexicanus*), black phoebe (*Sayornis nigricans*), cliff swallow (*Petrochelidon pyrrhonota*), northern rough-winged swallow (*Stelgidopteryx serripennis*), and white-throated swift (*Aeronautes saxatalis*). A few species, primarily killdeer (*Charadrius vociferus*), may choose to nest on bare ground within the Project site.

Because portions of the Project site are within the MSHCP survey area for burrowing owl (BUOW), a biological resource assessment was prepared for the Project (see Figure 2 in biological resource assessment report for survey locations).[15].No burrowing owls were observed during the focused survey. In addition, no owl signs (i.e., whitewash, owl pellets, feathers, burrows) were observed during the site survey due to numerous trees, limited open areas within and adjacent to the campus, regularly mowed and manicured lawns, and high pedestrian and vehicle traffic nearby. Based on this evidence, the Project site does not contain suitable habitat for burrowing owls. The MSHCP Burrowing Owl Survey Guidelines, Section 6.3.2, indicate a pre-construction burrowing owl survey will not be required due to the lack of habitat within the campus grounds.

The ornamental trees and shrubs that occur in the developed area of the site may support nests utilized by birds protected under MBTA or the California Fish and Game Code (Sections 3503, 3503.5, and 3515), as discussed previously. Therefore, any future development that would occur in accordance with the CBUSP Amendment could result in direct and indirect construction-

[13] *Ibid.*

[14] *Inventory of Rare and Endangered Plants. 2017.* California Native Plant Society, Rare Plant Program. http://www.rareplants.cnps.org/advanced.html#ccl=RIV&quad=3311784:3311783 (Accessed August 24, 2017).

[15] *Biological Resources Assessment*, LSA, September 12, 2017.

related disturbance for nesting birds. **Mitigation Measure BIO-1 (MM-BIO-1)** requires nesting bird surveys to be conducted prior to any ground-disturbing activities that would accompany future development within the CBU Specific Plan Zone. Impacts to biological resources would be **less than significant with mitigation incorporated.**

Threshold B: Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The Project site has been previously graded, is fully developed with university and associated facilities, and is completely surrounded by urban development. No riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the USFWS occurs on the Project site due to the developed nature of the CBU Specific Plan Zone.

The Project site is within the Cities of Riverside and Norco Area Plan of the MSHCP. The Project site is not within or adjacent to an MSHCP Criteria Cell, Public/Quasi Public lands, NEPSSA, CASSA, or additional species survey areas. A constructed storm water detention basin is located between Lot 1 and Magnolia Avenue and has the potential to support riparian/riverine resources (Figure 4.4-2); however, pursuant to Volume 1, Section 6.1.2, *Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*, the detention basin is exempt from the MSHCP's definition of a Riparian/Riverine Area.

The MSHCP definition of Riparian/Riverine Areas given in Volume 1, Section 6.1.2. of the MSHCP is as follows: "*lands which contains Habitat dominated by trees, shrubs, persistent emergents, or emergent mosses and lichens, which occur close to or which depend upon soil moisture from a nearby fresh water source; or an area with fresh water flow during all or a portion of the year."*[16] However, the MSHCP goes on to state, "*With the exception of wetlands created for the purpose of providing wetlands Habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, areas demonstrating characteristics as described above which are artificially created are not included in these definitions.* Since the detention basin is constructed for the purposes of storm water capture, retention, infiltration, and drainage for beneficial reuse to attain applicable water quality standards, and not for the purposes of providing wetlands habitat, open waters, or association with natural stream courses, this definition of Riparian/Riverine Areas does not apply to the

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

constructed stormwater detention basin within the CBU Specific Plan Zone, and it is not subject to administration in accordance with the MSHCP.[17]

Impacts to riparian/riverine resources would be **less than significant** and no mitigation is required.

Threshold C: Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The Project site has been previously graded, is fully developed with university and associated facilities, and is completely surrounded by urban development. A constructed storm water detention basin is located between Lot 1 and Magnolia Avenue and has the potential to support riparian/riverine resources (Figure 4.4-2). However, the regularly maintained basin is a local storm water management facility not located on land previously part of a natural streambed or drainage area and is exempt from Section 404 of the CWA because it is constructed for the purposes of storm water capture, retention, infiltration, and drainage for beneficial reuse to attain applicable water quality standards, and not for the purposes of providing wetlands habitat, open waters, or association with natural stream courses. Therefore, the storm water basin is subject to the United States Environmental Protection Agency's (EPA) definition of, "*Artificial lakes or ponds created by excavating and/or diking dry land and used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing*" [for aquatic areas] generally not protected by the Clean Water Act.[18]

As previously stated, there is currently no approved guidance for delineating areas potentially subject to RWQCB jurisdiction. Generally, areas subject to RWQCB regulation are typically determined to coincide with areas subject to USACE jurisdiction as recommended by the RWQCB's September 2004 Workplan.[19] Since the storm water detention basin is exempt from USACE jurisdiction, RWQCB jurisdiction in this case is coincident with USACE jurisdiction for purposes of CWA Section 401 certification.

---

17 Biological Resources Assessment, *LSA*, September 12, 2017.

18 *Guidance to Identify Waters Protected by the Clean Water Act. United States Environmental Protection Agency.* September 15, 2016. https://www.epa.gov/cwa-404/guidance-identify-waters-protected-clean-water-act. (Accessed August 23, 2017).

19 *Workplan: Filling the Gaps in Wetland Protection. 2004.* State Water Resources Control Board. https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/wrkplan_filing_gaps_wet_prot_9_24_04.pdf. (Accessed August 24, 2017).

For these reasons, impacts to federally protected wetlands would be **less than significant**, and no mitigation is required.

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

The Project site has been previously graded, is fully developed with university and associated facilities, and is surrounded by urban development on all sides. The Project site is not within or adjacent to an MSHCP Criteria Cell, Core, or Linkages, Public/Quasi Public lands, NEPSSA or CASSA, or additional species survey areas.[20,21,22] Therefore, the Project site is not within an established native resident or migratory wildlife corridor, and does not contain any native wildlife nursery sites.[23] Impacts related to the movement of native or migratory species are considered **less than significant,** and no mitigation is required.

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

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

Any future project involving CBU-administered properties or facilities will be subject to compliance with the CBUSP Amendment. Accordingly, removal or relocation of trees will follow the requirements of the landscape design guidelines outlined in the proposed CBUSP

[20] Section 5.4-Biological Resources, *City of Riverside General Plan and Supporting Documents Environmental Impact Report.* Figure 5.4-2, Figure 5.4-4, and Figures 5.4-6 through 5.4-8. City of Riverside. December 2007.

[21] Open Space and Conservation Element, *City of Riverside General Plan 2025.* Figures OS-6 through OS-8. City of Riverside, November 2007.

[22] *Western Riverside County Multiple Species Habitat Conservation Plan, Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools.* County of Riverside Transportation and Land Management Agency. >http://www.rctlma.org/Portals/0/mshcp/volume1/sec6.html< Website accessed 5/12/2016.

[23] Open Space and Conservation Element, *City of Riverside General Plan 2025.* Figure OS-7. City of Riverside, November 2007.

Amendment (for trees within the CBU Specific Plan Zone) and the City's Urban Forestry Policy Manual (for trees within City right-of-way).[24,25]

For any future development within the CBU Specific Plan Zone, edge effects to existing off-site landscaping would be addressed in accordance with Chapter 5 (*Design Guidelines*) of the CBUSP Amendment. For example, a continuation of CBU's picturesque, park-like campus setting is required, and all landscaping near Magnolia Avenue, Adams Street, and Monroe Avenue would be designed to reinforce visual and thematic connections to the landscaping along these streets. The boundaries of the CBU Specific Plan Zone along Magnolia Avenue, Adams Street, Monroe Street, and Diana Avenue/SR-91 would be treated with recurring plant materials to visually unify the campus, while being mindful of the surrounding neighborhoods. If implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual and the CBU Tree Campus USA Urban Forest Management Guidelines to manage landscaping within the campus.

The City considers select tree species, such as palm trees and eucalyptus wind rows, to be of value to the City's heritage. The proposed CBUSP Amendment addresses heritage trees with a landscape design intended to protect and preserve them throughout the Project site in accordance with Policy HP-1.4 of the City's *General Plan 2025*.[26] Removal or relocation of heritage trees will be subject to City staff review. A prior cultural resources study identified a mature gum (*Eucalyptus Spp.*) windbreak tree located in a now-separate parcel to the south that was identified as a related feature of the Hawthorne House. The subject tree is located within the southern boundary of The Colony at CBU, north of the baseball field (Figure 4.5-1). In addition, a few large trees are growing in the open field including a "Christmas tree" next to Magnolia Avenue, which is an ornamental pine (*Pinus sp).* In the southeast corner of the Magnolia Lawn is a California live oak (*quercus agrifolia),* which is being preserved by CBU, along with another majestic pine and a ginko *(Ginko biloba)* tree. To help ensure a less than significant impact regarding possible heritage trees, **Mitigation Measure BIO-2 (MM-BIO-2)** shall be implemented. Chapter 6 of the proposed CBUSP Amendment provides methods, programs, and financing mechanisms to be used to assess the health and stability of the tree and administer appropriate treatment measures (refer to Section 4.4.4 above).

---

[24] *Califo California Baptist University Specific Plan Amendment, Public Review Draft,* Chapter 7, Section C, Subsection 1-2. City of Riverside. August 2018.

[25] *Urban Forestry Policy Manual. City of Riverside*, Public Works Department. August 2015.

[26] Historic Preservation Element, *City of Riverside General Plan 2025.* Page 26. City of Riverside, November 2007.

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

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

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

The Project site is within the SKR-HCP fee boundary, but is not within a SKR-HCP core reserve. Future construction under the CBUSP Amendment is subject to applicable per-acre mitigation fees. The City's SKR fees are required to be paid at the time of grading permit issuance, pursuant to Riverside Municipal Code Section 16.40.040. Payment of applicable regional, State and federal conservation, endangered and threatened species mitigation fees will ensure impacts related to conflict with conservation plans are **less than significant**. No mitigation is required.

4.4.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant impacts. The following mitigation measure has been evaluated for feasibility and is incorporated in order to reduce potentially significant impacts related to on site nesting birds and heritage trees.

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

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

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

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

4.4.7 Environmental Impacts After Mitigation Is Incorporated

Impacts to biological resources can be mitigated to less than significant levels by incorporating mitigation measures **MM-BIO-1** and **MM-BIO-2** as described in Section 4.4.6. No significant impacts would remain after mitigation.

4.4.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Department of Fish and Wildlife. *Departmental Jurisdiction Over Waterways.* Memo Dated October 17, 1988

California Department of Fish and Wildlife. *Jurisdictional Issues in the Application of Fish and Game Code Sections 1601 and 1603*. Memo Dated July 2, 1990

California Native Plant Society, Rare Plant Program. *Inventory of Rare and Endangered Plants.* 2017. http://www.rareplants.cnps.org/advanced.html#ccl=RIV&quad=3311784:3311783 (Accessed August 24, 2017).

City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside, *California Baptist University Specific Plan, Public Review Draft*, August 2018.

City of Riverside, *City of Riverside General Plan 2025*. November 2007, Amended November 2012 and March 2013.

City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. December 2007.

City of Riverside, *Initial Study and Mitigated Negative Declaration for the California Baptist University Specific Plan.* January 2012.

City of Riverside, Public Works Department, *Urban Forestry Policy Manual*. August 2015.

City of Riverside, Riverside Municipal Code Chapter 16.72 – Western Riverside Multiple Species Habitat Conservation Plan Fee Program. https://www.riversideca.gov/municode/pdf/16/16-72.pdf (Accessed August 23, 2017).

Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in *Rapanos v. United States* & *Caravell v. United States.* June 6, 2007 and revised December 2, 2008. https://www.epa.gov/sites/production/files/201602/documents/cwa_jurisdiction_following_rapanos120208.pdf. (Accessed August 24, 2017).

County of Riverside. *Ordinance No. 810.2.* http://www.rivcocob.org/ords/800/810.htm (Accessed August 23, 2017).

County of Riverside Transportation and Land Management Agency. *Western Riverside County Multiple Species Habitat Conservation Plan, Section 6.1.2 - Protection of Species Associated with Riparian/Riverine Areas and Vernal Pools*. http://www.rctlma.org/Portals/0/mshcp/volume1/sec6.html (Accessed August 23, 2017).

LSA Associates, Inc., *Biological Resources Assessment for the California Baptist University Campus*, September 12, 2017.

Riverside County Information Technology. *Riverside County Geographic Information Services.* http://data-countyofriverside.opendata.arcgis.com/datasets/a479299547054233a483325069b394c6_4?geometry=-117.453%2C33.929%2C-117.334%2C33.982&mapSize=map-maximize (Accessed August 23, 2017).

State Water Resources Control Board. *Workplan: Filling the Gaps in Wetland Protection*. 2004. https://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/wrkplan_filing_gaps_wet_prot_9_24_04.pdf. (Accessed August 24, 2017).

U.S. Army Corps of Engineers. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region (Version 2.0).* September 2008. http://www.usace.army.mil/Portals/2/docs/civilworks/regulatory/reg_supp/trel08-28.pdf (Accessed August 24, 2017).

U.S. Army Corps of Engineers Jurisdictional Determination Form Instructional Guidebook. http://www.usace.army.mil/Portals/2/docs/civilworks/regulatory/cwa_guide/jd_guidebook_051207final.pdf. (Accessed August 24, 2017).

U.S. Department of Agriculture, Natural Resources Conservation Service. 2013. *Web Soil Survey*. https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx (Accessed August 23, 2017).

United States Environmental Protection Agency. *Guidance to Identify Waters Protected by the Clean Water Act.* September 15, 2016. https://www.epa.gov/cwa-404/guidance-identify-waters-protected-clean-water-act. (Accessed August 23, 2017).

Western Riverside County Regional Conservation Authority. *Summary Report Generator*. https://www.wrc-rca.org/rcamaps/conservation-summary-report-generator/ (Accessed August 24, 2017).

4.5 CULTURAL RESOURCES

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential impacts to cultural resources. The EIR evaluates the potential impacts related to historical resources, potential discovery of archaeological resources, paleontological resources, and human remains resulting from implementation of the proposed Project. The analysis contained in this section is based upon the following reports:

- *Cultural Resources Survey, California Baptist University Specific Plan.* JM Research and Consulting. 2012.
- *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018 (EIR Appendix D).

In response to the NOP, the California Native American Heritage Commission (NAHC) sent a letter dated May 5, 2016 to the City stating the Project is subject to California Government Code Sections 65040.2, 65352.3 et seq. Additionally, the NAHC noted that CEQA was modified via Assembly Bill (AB) 52, and tribal consultation is now required under both AB52 and Senate Bill (SB) 18. The NAHC outlined the basic provisions of AB 52 and SB 18 consultation as well as recommendations for the preparation of Cultural Resource Assessments.

Detailed discussion of the City's consultation with interested Native American Tribes pursuant to AB 52 and SB 18 is provided in Section 4.17, Tribal Cultural Resources of this EIR. Preparation of the project-specific Cultural Resource Assessment[1] is in accordance with *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.*[2]

4.5.1 Setting

The approximately 167-acre CBU Specific Plan Zone (CBU SP-1 and CBU SP-2) is located in the City of Riverside and surrounded by existing urban uses. The latitude and longitude of the

---

1 *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

2 *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.* United States Department of the Interior, National Parks Service, Technical Preservation Services. Washington D.C. Kay D. Weeks and Anne E. Grimmer. 1995.

approximate center of the site is 33°55'41.50"N and 117°25'32.32"W. The site is within Sections 5 and 8 of Township 3 South, Range 5 West of the *Riverside West, California* 7.5-minute quadrangle, San Bernardino Baseline and Meridian, as mapped by the U.S. Geological Survey (USGS).

Land uses surrounding the CBU Specific Plan Zone include single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; single-family and multi-family residential, commercial, and school uses to the west; and State Route 91 freeway, multi-family residential, church, school, and commercial uses to the south. The northern boundary of the CBU Specific Plan Zone is located generally along Magnolia Avenue, which is a tree-lined arterial street established in 1876 as a major thoroughfare and is designated a Scenic Boulevard, Parkway, and Special Boulevard within the Circulation and Community Mobility Element of the City's *General Plan 2025*.[3]

The entire CBU Specific Plan Zone has been previously graded and generally slopes from south to north, with an approximate elevation range between 770 and 830 feet above mean sea level. The natural topography of the area is valley lowland intersected by rolling hills and surrounded by mountain ranges. Most of the regional area has been developed or disturbed, and the nearest remaining large areas of native habitats occur along the Santa Ana River and the hills of Alessandro Heights two miles to the north and south, respectively.

The Project area sits on old alluvial fan deposits (Qof) of late to middle Pleistocene age (11,700 to 781,000 years ago) that covers Cretaceous granitic rocks. Based on a cultural resources inventory conducted for the existing *2013 CBUSP*,[4] soil on the CBU campus is a medium brown silty loam, and ground surface visibility is minimal (less than five percent) due to the predominance of paving, landscaping, and buildings.[5]

Archaeological Context

The Project site is situated within the traditional boundary region of three Native American groups, the Gabrieliño (Tongva), the Cahuilla, and the Luiseño.[6,7,8,9,10,11,12] Tongva territory

---

3 Circulation and Community Mobility Element, *Riverside General Plan 2025.* Figures CCM-4 and 5.1-1, Tables 5.1-A and 5.1-B. City of Riverside. November 2007, Amended November 2012.

4 City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

5 *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting. 2012.

6 Gabrielino. In *Handbook of North American Indians, Volume 8, California.* Pp. 538-549. Bean, Lowell J. and Charles R. Smith. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

7 *Handbook of the Indians of California, Bureau of American Ethnology Bulletin 78*. Kroeber, Alfred L. Smithsonian Institution, Washington D.C. 1925.

includes the Santa Ana River watershed and stretches from the San Gabriel Mountains to Laguna Hills and from the southern Channel Islands to the San Bernardino Valley. Tongva language is derived from the Takic family, part of the Uto-Aztecan linguistic stock. The term "Gabrieliño" came from the association with the Mission San Gabriel Archangel; however, today the group prefers to be known by Tongva, their ancestral name.

The basis of the Tongva religious life at the time of Spanish contact was Chingichnich, centered on a heroic, mythological figure who created mankind and established the rules and laws by which adherents would live their daily lives. The Tongva established permanent villages with houses that were large, circular, and domed that could hold up to 50 people. They cleared areas along the landscape for races and games such as lacrosse and pole throwing, recreation activities that occurred adjacent to the villages. Each of the larger villages would have a wankech-an enclosure containing a representation of Chingichnich.

The Cahuilla culture area incorporated east-central Riverside County, consisting of desert, pass (San Gorgonio Pass), and mountain groups, with each affiliation describing the exploitation area of each group. Desert Cahuilla ranged throughout the Coachella Valley from almost El Centro to Cabazon; the Pass Cahuilla occupied San Gorgonio Pass, and the Mountain Cahuilla occupied the Santa Rosa Mountains. The Cahuilla are linguistically comprised of a language belonging to the Cupan subgroup of the Takic family of the Shoshonean (Uto-Aztecan) linguistic stock.

Cahuilla villages usually were in canyons or near sources of water and food plants. The retreat of Lake Cahuilla, an ancient lake once three times the size of the existing Salton Sea, began at approximately A.D. 1500. Within just a few decades the salinity of the lake water was such that it was no longer able to be used for human consumption. The eventual desiccation of Lake Cahuilla resulted in the emigration of human populations (proto-historic Cahuilla) to the south and west through San Gorgonio Pass into the San Jacinto Plains.

Spring Rancheria, occupied from approximately 1880 to 1900, was one of the Cahuilla villages near the Project site, located on the north side of Mount Rubidoux where Spring Brook joins

---

[8] The First Angelinos: the Gabrielino Indians of Los Angeles. W. McCawley. Morongo Indian Reservation, Banning: Malki Museum Press. 1996.

[9] California Archaeology. Moratto, Michael J. San Diego: Academic Press. 2004.

[10] *Perris Reservoir Archaeology: Late Prehistoric Demographic Change in Southeastern California.* O'Connell, J. F., P. J. Wilke, T. F. King, and C. L. Mix (Eds.) Sacramento: Department of Parks and Recreation Archaeological Reports, Page 14. 1974

[11] *Late Prehistoric Change in Land Use Patterns at Perris Reservoir*. Wilke, P. J. Los Angeles: University of California, Los Angeles Archaeological Survey Annual Report. Pp. 155-164. 1971.

[12] Luiseño. In *Handbook of North American Indians, Volume 8, California.* Pp. 550-563. Bean, Lowell J. and Florence C. Shipek. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

with the Santa Ana River. Spring Rancheria was listed in the *1889 Riverside City Directory,* which documents that the villagers worked for nearby Riverside residents.[13]

The territory of the Luiseño included portions of San Diego, Riverside, and Orange Counties. The term "Luiseño" was given to those native people living within the "ecclesiastical jurisdiction of Mission San Luis Rey... [and who shared] an ancestral relationship which is evident in their cosmogony, and oral tradition, common language, and reciprocal relationship in ceremonies."[14] Prior to Spanish occupation of California, the territory of the Luiseño extended along the coast from Agua Hedionda Creek to the south, Aliso Creek to the northwest, and the Elsinore Valley and Palomar Mountain to the east. These territorial boundaries were somewhat fluid and changed through time. They encompassed an extremely diverse environment that included coastal beaches, lagoons and marshes, inland river valleys and foothills, and mountain groves of oaks and evergreens.

The Luiseño lived in small communities that were the focus of family life. Patrilineally linked, extended families occupied each village. The Luiseño believed in the idea of private property. Property rights covered items and land owned by the village as well as items (houses, gardens, ritual equipment, trade beads, eagle nests, and songs) owned by individuals. Trespass against any property was punished. Luiseño villages were politically independent, and were administered by a chief who inherited his position from his father.

Luiseño subsistence was based primarily on seeds such as acorns, grass seed, manzanita, sunflower, sage, chía, and pine nuts and game animals such as deer, rabbit, jackrabbit, wood rat, mice, antelope, and many types of birds. Seeds were dried and ground to be cooked into a mush. The Luiseño utilized fire for crop management and communal rabbit drives.

Historical Context

The following discussion is based on the Historical Context of the CBU detailed in Chapter 2, *Planning Framework* of the CBUSP.[15]

The City of Riverside developed slowly as small citrus groves, with farms and ranches gradually populating the area. To provide irrigation for the area's burgeoning agriculture, the Riverside Land & Irrigation Company constructed the Riverside Lower Canal near the southern boundary

---

[13] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

[14] *The Luiseno Village During the Late Prehistoric Era.* Unpublished Ph.D. Dissertation, Department of Anthropology, University of California, Riverside. Joan Oxendine. 1983.

[15] *California Baptist University Specific Plan, Public Review Draft.* Chapter 2, Section A. City of Riverside. August 2018.

of the present-day CBU campus in 1875. Magnolia Avenue, a tree-lined arterial street established in 1876 as a major thoroughfare in Riverside, generally constitutes the northern boundary of the CBU campus. A.C.E Hawthorne constructed a residence near the southeast corner of Magnolia Avenue and Monroe Street in 1889 where the family cultivated a 20-acre citrus ranch. The residence and an associated eucalyptus tree remain on campus and have been designated as a City Landmark. The Wilkes family constructed a Victorian-era farmhouse, with associated improvements, that was a neighboring home to the Hawthorne House. It sat where Harden Square exists today on campus. The palm trees along Palm Drive and in Harden Square are associated with the original farmhouse and are contributors to the campus and Neighbors of Woodcraft Historic District.

The original large lots were subdivided and replaced by smaller lots in the early twentieth century for modest ranches, like the 1909 Cooper House on Adams Street. A residence constructed in 1927 at the southeast corner of Magnolia Avenue and Adams Street has been remodeled many times over the years and is now the Lambeth House School of Nursing. Neighbors of Woodcraft acquired the 20-acre Wilkes farm in 1920 and converted the residence into a retirement home. A hospital was built in 1922 and expanded in 1931, which is now the Anne Gabriel Library. The retirement home, now known as the W.E. James Building, was designed by architect Henry L. Jekel and constructed in 1925-26. A new laundry and boiler room constructed in 1938 now serves as the Central Plant and Ceramics/Sculpture building.

The Neighbors of Woodcraft continued to acquire land until they amassed 75 acres in 1939. In 1950, the Los Angeles Baptist Association opened the doors of California Baptist College in El Monte, California. In 1955, the College acquired the entire 75-acre Neighbors of Woodcraft complex, relocated to the [current] Riverside campus, and began the conversion and use of the buildings as an educational function. The College became accredited by 1961 and began a long-term expansion plan with the construction of the Lancer Arms Apartments in 1964, the Smith and Simmons Dormitories and the Van Dyne Field House in 1968, and the Wallace Book of Life Theater in 1973. Meanwhile, development was emerging along the campus boundaries that included apartments, a fraternal hall, and the Adams Plaza shopping center along Adams Street; single-family homes along Monroe Street; and a Methodist Church and a tract of single-family homes on Diana Avenue. Additional apartment complexes were constructed as infill development in recent years. Modern university-related construction has continued on campus since the late 1990s.

In 1998, the College became California Baptist University (CBU) and has undergone extensive growth annually since that time. Today, CBU is one of the top private Christian liberal arts colleges and universities in the nation, offering bachelor's, master's, and credential programs at its Riverside and San Bernardino campuses and online. The 156.4-acre current CBUSP Planning Area contains Spanish-style buildings accommodating classrooms, campus housing, a library,

offices, and maintenance and athletic facilities. In the midst of dynamic growth, CBU continues the tradition of education in a Christian environment.

Existing Conditions

The following discussion is based on the Historical Context and Existing Cultural Resources comprising CBU, as detailed in Chapter 2, *Planning Framework* and Chapter 4, *Land Use Regulations and Development Standards* of the CBUSP, respectively,[16] as well as the Cultural Resources technical reports prepared in support of the CBUSP.[17,18]

A cultural resources inventory was conducted by JM Research & Consulting and updated in 2018 by Wilkman Historical Services (Appendix D) to identify and provide recommendations related to all cultural resources within the CBUSP Amendment area. The survey determined that development on the Arlington block predates the campus, beginning in the late 19th Century with the construction of the Riverside Lower Canal and the improvement of fields, orchards, groves, and large residences on 10-acre rural parcels. Two major periods of University development are represented: the Neighbors of Woodcraft facilities from 1922-1938, into which CBU moved in 1955, and long-range campus planning and development in the 1960s and '70s. Improvement and expansion of the campus in the 1980s and beyond included the construction of temporary and modular facilities and the acquisition of adjacent parcels that had been improved from the earliest Victorian-era settlement of Arlington throughout the 20th Century. Thus, the CBU Specific Plan Zone contains an eclectic collection of property types, including single-family and multi-family residential, dormitories, churches, warehouses, offices, classrooms, a gymnasium, theater, fraternal hall, and library.

The CBU Specific Plan Zone is located along Magnolia Avenue, which is designated a Scenic Boulevard, Parkway, and Special Boulevard within the Circulation and Community Mobility Element of the City's *General Plan 2025*.[19] A General Plan Amendment has been filed by CBU to remove those portions of the *Magnolia Avenue Specific Plan* that overlap the CBU Specific Plan Zone. The western and northern boundaries of the CBU Specific Plan Zone (along Monroe Street, Magnolia Avenue, and a portion of Adams Street) remain within the Magnolia Heritage District of the *Magnolia Avenue Specific Plan* (Figure 2-4).The Magnolia Heritage District is one

---

16 *California Baptist University Specific Plan, Public Review Draft.* Chapter 6, Section A. Chapter 2, Section A. Chapter 3, Section A. City of Riverside. August 2018.

17 *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting (JMRC). 2012.

18 *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

19 Circulation and Community Mobility Element, *Riverside General Plan 2025.* Figures CCM-4 and 5.1-1, Tables 5.1-A and 5.1-B. City of Riverside. 2007, Amended November 2012.

of the two oldest communities, the other being Arlington Village, located along the original Magnolia Avenue corridor.[20] According to the *2013 CBUSP*, CBU street frontages along Magnolia Avenue consist of mixed use/academic, mixed use/residential, athletics, and open space.[21] Properties within the Magnolia Heritage District and surrounding the CBU Specific Plan Zone consist primarily of multi-family housing, with some single-family housing and commercial retail uses. According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University.

The Riverside Land & Irrigation Company constructed the Riverside Lower Canal near the southern boundary of the campus during the late 19th Century to provide irrigation for that area's burgeoning agriculture. One stand pipe located in proximity of the athletic fields may be the only surficial remnant of the Riverside Lower Canal within the CBU Specific Plan Zone. Meanwhile, there are several historic resources within the CBU Specific Plan Zone that are significant at the national, State, and local level (Figure 4.5-1).

Neighbors of Woodcraft Historic District is recommended eligible for the National Register of Historic Places (NRHP) whose contributing elements include the Anne Gabriel Library, Harden Square, Palm Drive, James Complex, Central Plant, Garage, Arched Arcade, Magnolia Lawn, and Fortuna Fountain. The Neighbors of Woodcraft Historic District has been identified as a contributing element to the CBU Historic District.

CBU Historic District is comprised of the Smith & Simmons [dormitory] Halls, the Van Dyne Field House Gymnasium, and the Wallace Book of Life [theatre] Building. The properties comprising the CBU Historic District individually contribute to the historic values which qualify the CBU Historic District as eligible for the California Register of Historical Resources (CRHR).

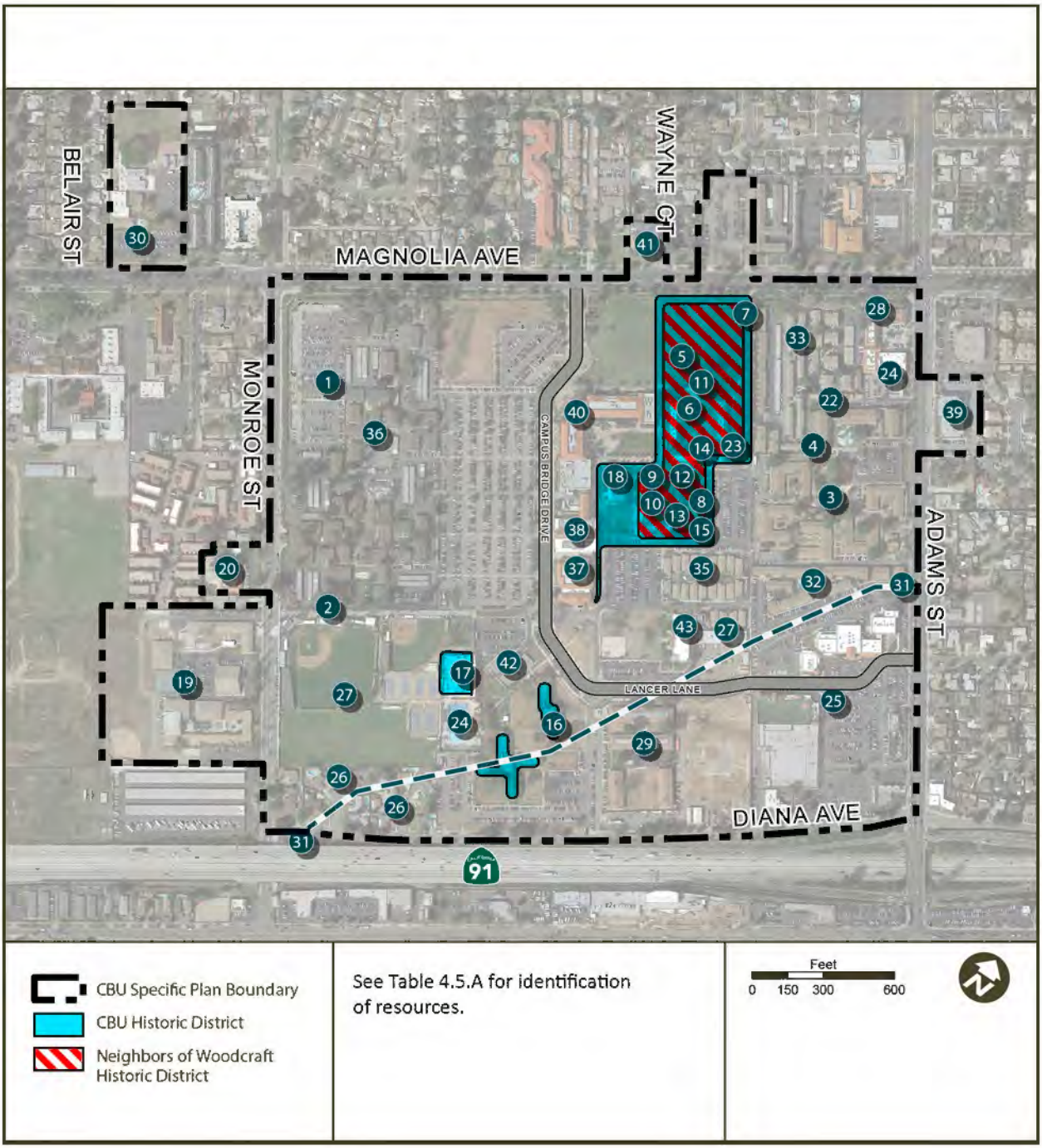
Hawthorne House & Eucalyptus Tree date to the late 19th Century and together are designated a City Landmark. The Eucalyptus tree is located on a parcel adjacent to the south of the Hawthorne House but has been determined contemporaneous and associated with the Hawthorne House, which was constructed in 1889.

---

[20] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. November 2009.

[21] *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Figure 4-1. Page 36. City of Riverside. March 2013.

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

FIGURE 4.5-1

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Existing Cultural Resources

SOURCE: *California Baptist University Specific Plan, Public Review Draft*, City of Riverside, July 2018.
I:\CTR1501\Reports\EIR\fig4.5-1_ExistingCulturalResources_08-13-2018.psd

THIS PAGE INTENTIONALLY LEFT BLANK

Rose Garden Village and Royal Rose (Tower Hall) were originally built as affordable senior citizen housing in the 1960s and 1970s but are not contemporaneous. Rose Garden Village is historically significant as an early example of affordable senior citizen housing and for its association with the Frank Miller and Richard Nixon families. Whereas the Rose Garden Village is an exceptional example of historic cultural and community heritage, circa 1961, eligible for both the NRHP and CRHR, the Royal Rose (Tower Hall), circa 1979, is clearly different from, and does not contribute to the National and California Register-eligible Rose Garden Village (Table 4.5.A). However, a facsimile of London's Big Ben clock tower on the Royal Rose property is of design interest and consistent with the British theme of the Rose Garden Village. Both complexes are currently in use by CBU for student housing.

4.5.2 Related Regulations

Federal Regulations

National Register of Historic Places. According to the *Guidelines for Completing National Register of Historic Places Forms,*[22] National Register of Historic Places (National Register) listing is intended for historical architecture, archaeology, engineering, or cultural entities that are expressed in a site, building, structure, district, or object. The National Register is not solely limited to entities with importance at the national level, but is also applicable to resources at the local and state levels. To qualify for National Register listing, a resource must meet one or more of the following criteria:

A. Association with events which have made a significant contribution to the broad patterns of our history.

B. Association with the lives of persons significant in our past.

C. Embodiment of the distinctive characteristics of a type, period, or method of construction or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.

D. Having yielded, or being likely to yield, information important in prehistory or history.

[22] *Guidelines for Completing National Register of Historic Places Forms*. National Parks Service. National Register Bulletin 16, Part A. U.S. Department of the Interior, National Park Service. 1991.

THIS PAGE INTENTIONALLY LEFT BLANK

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
Category 1A - Designated Historical Resources* *Unless specifically defined as a resource contributor, alterations subject to environmental review pertain only to those made to the exterior of a resource.								
1	A.C.E. Hawthorne House	1889-1890	Core Campus*	Administration	5S1	No	COA/Staff Review | EIR	Designated City Landmark, plaque installed. Proposal to relocate the Hawthorne House to 8712-8720 Magnolia Avenue has been examined. Refer to Sections 4.5.5 and 4.5.6 for details and required mitigation.
2	A.C.E. Hawthorne House Eucalyptus Tree	N/A	Core Campus*	Landscape	5S1	No	COA/Staff Review | EIR	Associated with Hawthorne House and likely dates to the 1890s. Designated City Landmark, plaque installed. Should this tree die of natural causes or act of God, follow-up measures will be per City staff review; no EIR will be required.
Category 2A - Eligible but not Designated Historical Resources* *Per Title 20 of the Municipal Code, an eligible resource is treated the same way as if it were designated. Unless specifically defined as a resource contributor, alterations subject to environmental review pertain only to those made to the exterior of a resource.								
3	Rose Garden Village (The Village at CBU)	1961	3668 Adams Street	Campus Housing	3S	No	COA/Staff Review | EIR	Assigned 3S status code per 2012 JMRC investigation. Exceptional example of historic cultural and community heritage. Eligible for both the National and California Registers. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. Alterations anticipated for conversion to student dormitories. Refer to Sections 4.5.5 and 4.5.6 for details and required mitigation.
4	Big Ben Clock	1982	3720	Clock Tower	5S2	No	COA/Staff	Evaluated by WHS in 2016,

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
	Tower		Adams Street				Review | EIR	determined eligible for local historic designation. Designation refers to tower only; does not include reflecting pool or other surrounding landscape features.
California Baptist University Historic District								
5	Magnolia Lawn and Historic Oak	N/A	Core Campus*	Landscape	3S; 3CD	Yes	Not Applicable | EIR	A turfed area with a huge oak tree. Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Should this tree die of natural causes or act of God, follow-up measures will be subject to City staff review and approval; no EIR will be required. Should the Great Lawn be required by government action to be replaced (eg: water efficient landscape requirement), the replacement landscaping must be low in profile, with the tree to remain the focus of attention. No EIR will be required for replacement per government action; however, the replacement landscaping will be subject to City staff review and approval.
6	Neighbors of Woodcraft (James Complex)	1925-1926	Core Campus*	Administration / Academic	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								maintenance and repair will require staff administrative review only. Proposed repurpose will require a COA and CEQA review.
7	Palm Drive	1920-1938	Core Campus*	Landscape	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. A paved roadway lined by date palms. Should any of the palms die from disease or act of God, they must be replaced with palms of the same species and size; no EIR will be required. However, the replacement trees will be subject to City staff review and approval.
8	Neighbors of Woodcraft (Harden Square)	N/A	Core Campus*	Landscape	3S; 3CD	Yes	COA/Staff Review | EIR	An open space consisting of turf and palms. Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
9	Neighbors of Woodcraft (Annie Gabriel Library)	1922	Core Campus*	Academic	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
10	Neighbors of Woodcraft Hospital Addition (Annie Gabriel Library)	1931	Core Campus*	Academic	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
11	Neighbors of Woodcraft Fortuna Fountain	1927	Core Campus*	Landscape	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and*

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
12	Neighbors of Woodcraft Garage (Storage)	1928-1933	Core Campus*	Storage	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
13	Neighbors of Woodcraft Arched Arcade (Arched Arcade)	Ca 1927	Core Campus*	Landscape	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only.

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								Proposed repurpose would require a COA and CEQA review.
14	Neighbors of Woodcraft (James Complex – 4 story)	1933-1934	Core Campus*	Academic	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
15	Neighbors of Woodcraft Laundry and Boiler Building (Central Plant)	1938	Core Campus*	Academic	3S; 3CD	Yes	COA/Staff Review | EIR	Surveyed 2011 by CRM Tech. CBU Historic District Contributor. Historic archeological resources found nearby, see 2012 [cultural resources] report for details and photographs.[23] Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
16	Smith & Simmons Halls	1968	Core Campus*	Campus Housing	3CD	Yes	COA/Staff Review | EIR	CBU Historic District Contributor per 2012 JRMC Cultural Resources Report. Refer to mitigation/recommendations in 2012 [cultural resources] report.[24] Level of environmental compliance for repurpose will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications

[23] *Cultural Resources Survey, California Baptist University Specific Plan.* JM Research and Consulting. 2012.
[24] *Ibid.*

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. Proposed repurpose would require a COA and CEQA review. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
17	George W. Van Dyne Gymnasium (Field House)	1968	Core Campus*	Athletics	3CD	Yes	COA/Staff Review | EIR	CBU Historic District Contributor per 2012 JRMC Cultural Resources Report. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
18	Wallace Book of Life Theatre	1973	Core Campus*	Theatre	3CD	Yes	COA/Staff Review | EIR	CBU Historic District Contributor per 2012 JRMC Cultural Resources Report. Level of environmental review for alterations will be based on intensity of proposed changes and potential impact to resource. Any exterior modifications must occur in

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								accordance with the *Secretary of Interior's Standards and* Title 20 of RMC. In-kind replacement of architectural components for maintenance and repair will require staff administrative review only. Proposed repurpose would require a COA and CEQA review.
Category 3A - Determined to Be Ineligible for Historical Designation								
19	Riverside Christian High School (Health Sciences Campus)	1964	3532 Monroe Street	Vacant	6Z	No	No Action | No Action	Assigned a 7R status code in 2012 JRMC report. Surveyed in 2016 by WHS and assigned 6Z status code.
20	Riverside Christian Day School (Medical Counsel Center)	1980	3626 Monroe Street	Day School	6Z	No	No Action | No Action	Surveyed in 2016 by WHS and assigned 6Z status code.
21	Lancer Outdoor Athletic Complex	No Date of Construction Listed	Core Campus*	Athletics	6L	No	Staff Review | Staff Review	Surveyed in 2016 by WHS and assigned 6L status code, but it deserves City staff review in the planning process. Any proposed ground disturbance in native soils must be monitored for cultural resources due to potential for subsurface agricultural materials associated with the Riverside Lower Canal (**MM-CUL-1)**.
22	Royal Rose (Tower Hall)	1979	3720 Adams Street	Campus Housing	6Z	No	Staff Review | Staff Review	Assigned 3S status code per 2012 JRMC report. Surveyed in 2016 by WHS and assigned 6Z status code., with exception of Big Ben clock tower.

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								See separate listing in this table for Big Ben clock tower.
23	Neighbors of Woodcraft Historic Mailbox	1920s-1930s	Core Campus*	Landscape	6Z	No	No Action | No Action	The 2012 JMRC report called for preservation of the mailbox as a historic element from the Neighbors of Woodcraft era (CBU Historic District). The 2018 WHS cultural resources survey and evaluation assessment assigned a 6Z status code and determined the mailbox was manufactured past the Period of Significance of this part of the CBU Historic District. No further review is required.
24	Knights of Pythias Hall (Bourns Engineering Laboratory)	1966	3750 Adams Street	Academic	6Z	No	Staff Review | Staff Review	Assigned a 5S2 status code per 2012 JMRC report. The 2018 WHS cultural resources survey and evaluation assessment changed the status code to 6Z since there are several better examples of intact fraternal buildings in Riverside.
25	Adams Plaza (Lancer Plaza)	1968-1972	3502-80 Adams Street	Mixed Use	6L	No	Staff Review | Staff Review	Assigned 6L status code in 2012 JMRC report. Consideration to be given to the preservation in place or relocation of the date palm cluster near the Shell Station. CBU is under no obligation to preserve this palm cluster, however, and may opt to remove it at its own discretion.
26	Diana Park Tract (Wilma and	1962	3459-95 Emily	Campus Housing	6Z	No	Staff Review | Staff Review	Assigned 6L status code in 2012 JMRC report due to proximity to Van

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
	Emily Court Housing)		Court; 3467-92 Wilma Court; 3471-95 Monroe Street					Dyne Field House. Revisited by WHS in 2016 and reassigned as a 6Z based on over 300-foot distance between Diana Park Tract and Van Dyne Field House.
27	CBU Facilities Management & Physical Plant	1976	Core Campus*	Maintenance	6Z	No	Staff Review | Staff Review	Assigned 6L status code in 2012 JMRC report due to proximity to Free Methodist Church has subsequently been demolished, negating need for 6L status code. Plan is to remove by 2020. Consideration must be given to monitoring any future grading associated with the redevelopment of the site in regards to potential archaeological materials that may exist in the vicinity of the former Riverside Lower Canal alignment (**MM-CUL-1)**.
28	Lambeth House (School of Nursing)	1927	8308 Magnolia Avenue	Academic	6Z	No	Staff Review | Staff Review	Assigned 6L status code in 2012 JMRC report due to proximity to Knights of Pythias property. Knights of Pythias property subsequently found to not qualify for historic designation, negating the need for 6L status code.
29	Lancer Arms	1964-1976	Core Campus*	Campus Housing	6L	No	Staff Review | Demolition Permit	Any further development on the property must be sensitive to the architecture, scale, massing, and landscaping of the adjacent Smith and Simons Halls historic resources, as detailed in Section 4.5.4 of this EIR. Consideration must also be given to

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								monitoring any future grading associated with the redevelopment of the site in regards to potential archaeological materials that may exist in the vicinity of the former Riverside Lower Canal alignment (**MM-CUL-1**).
30	Lutheran Church of the Cross (8775 Magnolia Avenue)	1956	8775 Magnolia Avenue	Elementary School	6L	No	Staff Review | Staff Review	Assigned 6L status code 2012 JMRC report. Consideration should be given to the preservation or relocation of the bell tower in any future development or redevelopment of this property. CBU is under no obligation to preserve this bell tower, however, and may opt to remove it at its own discretion.
31	Riverside Lower Canal	1875	N/A	N/A	6L	No	See Remarks | See Remarks	Not evaluated in JMRC report. Needs to be documented. Highly disturbed. No above-ground evidence of this feature remains. Any ground disturbance in area of former canal alignment must be considered for monitoring for potential archaeological materials (**MM-CUL-1**). Potential alfalfa irrigation feature (pipe) found in area of campus soccer field as identified in 2012 JMRC report lacks historical context to justify preservation.
32	San Carlos Apartments (The Point)	1972	3622 Adams Street	Campus Housing	6L	No	ADR | Demolition Permit	Assigned 6L status code in 2012 JMRC report due to proximity to Rose Garden Village, a cultural resource found eligible for the National Register. Sensitivity to the scale,

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								design, and layout of Rose Garden Village should be considered in any future development of this property. Monitoring is required for any future grading associated with the redevelopment of the site in regards to potential archaeological materials that may exist in the vicinity of the Riverside Lower Canal alignment (**MM-CUL-1)**.
33	Willow Wood, Pine Creek, and Magnolia Hacienda Apartments (University Place)	1971-1987	3780 Adams Street & 8350-98 Magnolia Avenue	Campus Housing	6L	No	ADR | Demolition Permit	Assigned 6L status code per 2012 JMRC report due to proximity to Palm Drive and Rose Garden Village. Any future development on the property must be sensitive to the architecture, scale, massing, and landscaping of the adjacent Palm Drive and Rose Garden Village historical resources, as detailed in Section 4.5.4 of this EIR.
45	Rettig Residence	1948	8712 Magnolia Avenue	Campus Housing	6Z	No	Staff Review | Staff Review	Evaluated by WHS 2017, found ineligible for historic designation at any level. May be used as site for relocation of Hawthorne House.
46	Johnson Residence	1946	8720 Magnolia Avenue	Campus Housing	6Z	No	Staff Review | Staff Review	Evaluated by WHS 2017, found ineligible for historic designation at any level. May be used as site for relocation of Hawthorne House.
Category 3B - Not Evaluated for Historical Significance								
34	Aquatics Center	1998	Core Campus*	Athletics	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
35	The Cottages	2004-2005	8432 Magnolia Avenue	Campus Housing	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned. Plan is to remove by 2020.
36	Parkside Village Apartments (The Colony)	1985-1987	3675 Monroe Street	Campus Housing	N/A	No	Staff Review | Staff Review	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. However, a Landmarked Eucalyptus tree associated with Hawthorne House could be impacted by major alterations/demolitions associated with this property, as discussed above. No CRHR Status Code assigned.
37	Joanne Hawkins School of Music	2004-2005	Core Campus*	Academic	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
38	School of Business	2011	Core Campus*	Academic	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
39	3739 Adams Street (School of Engineering)	2003	Core Campus*	Academic	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition Alter/Relocate | Demolish	Remarks and Management Recommendations
								10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
40	Eugene and Billie Yeager Center	2002-2003		Academic	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
41	College View Apartments (CBU Facilities & Planning Services Administration Building)	1990	8471 Magnolia Avenue	Administration	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
42	Modular Bungalows	1998	Core Campus*	Athletics	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
43	Mission Hall Modular	1998	Core Campus*	Academic	N/A	No	No Action | No Action	Property too new to be candidate for survey and will not be old enough to warrant survey within the anticipated 10-year lifespan of the Specific Plan. No CRHR Status Code assigned.
Other								
N/A	N/A	N/A	Infill buildings within a historic district	N/A	N/A	Yes	Administrative COA	

Table 4.5.A
Disposition of Properties Surveyed for Historic Significance

Reference Number (Figure 4.5-1)	Historic Name (Current Name)	Date of Construction	Street Address	Predominant Use as of 2017	California Historical Resource Status Code	In Historic District? (yes/no)	Planned Disposition		Remarks and Management Recommendations
							Alter/Relocate	Demolish	
CALIFORNIA HISTORICAL RESOURCES STATUS CODE DEFINITIONS									
5S1	Individual property that is listed or designated a local historical resource.								
5S2	Individual property that is eligible for local historical resource listing or designation.								
3S	Appears eligible for the National Register of Historic Places through a survey evaluation.								
3CD	Appears eligible as a contributor to a California Register of Historical Resources qualified historic district through a survey evaluation.								
6L	Determined to be ineligible for historic designation through local government review process, may warrant special consideration in local planning..								
6Z	Determined to be ineligible for the National Register of Historic Places, the California Register of Historical Resources, or Local designation through survey evaluation.								
7R	Identified in Reconnaissance Level Survey: Not evaluated.								

Sources: *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting (JMRC). 2012.
Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update. Wilkman Historical Services (WHS). August 2018.
California Baptist University Specific Plan, Public Review Draft. Table 6-1. City of Riverside. August 2018.

COA: Cultural Heritage Board Certificate of Appropriateness
Staff Review: Administrative review or determination by historic preservation staff.
EIR: Environmental Impact Report
No Action: No cultural resources-related action is required.

However, it is not enough for a resource to meet one or more of the above criteria. It must also exhibit integrity. National Register Bulletin 15 defines *integrity* as "the ability of a property to convey its significance."[25] The following integrity criteria are used by the federal government:

- Location: The historical location of the property or event.
- Design: The historical form, layout, and style of the property.
- Setting: The physical context.
- Materials: The items that were placed in a specific time period/configuration.
- Workmanship: The craftsmanship of the entity's creators.
- Feeling: The expression of the historic sense of a time period.
- Association: The link between a historical event/person and property.

Not all of the integrity criteria must be met for a resource to be eligible for listing. A resource must, however, retain enough integrity to convey its historical significance.

The National Register sets as a guideline that a resource should be 50 years old or older to be considered a listing. However, an allowance may be made for younger resources to qualify for listing provided they are of exceptional significance. A resource listed, or eligible for listing, on the National Register is identified as a Historic Property.

The Secretary of the Interior's Standards for Treatment of Historic Properties. The Secretary of the Interior's Standards for Treatment of Historic Properties (Standards) are historic preservation principles that include concepts about maintaining, repairing and replacing historic materials, and designing new additions or making alterations. The Standards include guidelines that provide general design and technical recommendations to assist in applying the Standards to a specific property. The Standards provide four approaches to the treatment of historic properties: preservation, rehabilitation, restoration, and reconstruction. The most common Standards used for the treatment of historic properties in CEQA are the Rehabilitation Standards. These include:

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

[25] *Guidelines for Completing National Register of Historic Places Forms*. National Parks Service. National Register Bulletin 16, Part A. U.S. Department of the Interior, National Park Service. 1991.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

When repair and replacement of deteriorated features are necessary, alterations or additions to the property are planned for a new or continued use, and when its depiction at a particular period of time is not appropriate, rehabilitation may be considered as a treatment or a mitigation measure under CEQA.

State Regulations

California Register of Historical Resources. A resource is considered by the City to be historically significant if the resource meets any of the criteria for designations listed in the California Register of Historical Resources (California Register):[26]

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

California resources listed in the National Register are automatically listed in the California Register. A resource listed, or eligible for listing, on the California Register is identified as a Historical Resource.

Local Regulations

City of Riverside General Plan 2025. In 1994, the City's General Plan was adopted and included historical preservation goals and policies that addressed preserving the City's historical and architecturally significant structures and neighborhoods and supporting and enhancing its arts and cultural institutions. In 2007, the City adopted the [new] General Plan 2025 while still maintaining a Historic Preservation Element. The Historic Preservation Element was amended November 2012 and the Open Space and Conservation Element was amended March 2013. The following objectives and policies related to the proposed Project are from the City's General Plan 2025 and, where applicable, the *Magnolia Area Specific Plan*. Although listed here, each of these objectives and policies is presented in Table 4.10.A of the Land Use and Planning Section of the EIR with an evaluation of the Project's consistency with the stated objectives and policies.

Historic Preservation Element[27]

Objective HP-1: To use historic preservation principles as an equal component in the planning and development process.

---

[26] California Public Resources Code Section 5024.1, 14 CCR 4852

[27] Historic Preservation Element. *City of Riverside General Plan 2025*. City of Riverside, November 2007, Amended November 2012.

Policy HP-1.1: The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage.

Policy HP-1.2: The City shall assume its direct responsibility for historic preservation by protecting and maintaining its publicly owned cultural resources. Such resources may include, but are not limited to, buildings, monuments, landscapes, and right-of-way improvements, such as retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs and gutters.

Policy HP-1.3: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process.

Policy HP-1.4: The City shall protect natural resources such as geological features, heritage trees, and landscapes in the planning and development review process and in park and open space planning.

Policy HP-1.5: The City shall promote neighborhood/city identity and the role of historic preservation in community enhancement.

Policy HP-1.6: The City shall use historic preservation as a tool for "smart growth" and mixed use development.

Objective HP-2: To continue an active program to identify, interpret and designate the City's cultural resources.

Policy HP-2.1: The City shall actively pursue a comprehensive program to document and preserve historic buildings, structures, districts, sites (including archaeological sites), objects, landscapes, and natural resources.

Policy HP-2.2: The City shall continually update its identification and designation of cultural resources that are eligible for listing in local, State and national registers based upon the 50-year age guideline for potential historic designation eligibility.

Policy HP-2.3: The City shall provide information to citizens and the building community about what to do upon the discovery of archaeological resources and burial sites, as well as, the treatment, preservation, and repatriation of such resources.

Objective HP-3: To promote the City's cultural resources as a means to enhance the City's identity as an important center of Southern California history.

Objective HP-4: To fully integrate the consideration of cultural resources as a major aspect of the City's planning permitting and development activities.

Policy HP-4.1: The City shall maintain an up-to-date database of cultural resources and use that database as a primary informational resource for protecting those resources.

Policy HP-4.2: The City shall apply the California State Historical Building Code to ensure that City building code requirements do not compromise the integrity of significant cultural resources, at the property owner's request.

Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

Objective HP-5: To ensure compatibility between new development and existing cultural resources.

Policy HP-5.1: The City shall use its design and plot plan review processes to encourage new construction to be compatible in scale and character with cultural resources and historic districts.

Policy HP-5.2: The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.

Policy HP-7.1: The City shall apply code enforcement, zoning actions, and building safety/construction regulations as tools for helping to protect cultural resources.

Policy HP-7.2: The City shall incorporate preservation as an integral part of its specific plans, general plan, and environmental processes.

Land Use and Urban Design Element[28]

Objective LU-12 Restore the Magnolia/Market Corridor to its historical role as a scenic "showcase roadway" that spans the City of Riverside while updating its

[28] Land Use and Urban Design Element. *City of Riverside General Plan 2025*. City of Riverside, November 2007, Amended March 2013.

	function as a key transit corridor to support future growth (Magnolia Avenue [Corridor-Wide] Specific Plan Objective 1[29]).
Policy LU-12.2	Maintain the existing mature heritage landscaping and infill landscaping as appropriate to return the Corridor to being a grand tree-lined parkway (Magnolia Avenue [Corridor-Wide] Specific Plan Policy 1.2).
Policy LU-78.2	Preserve historic landscaping and increase green space along the Magnolia Corridor (Magnolia Avenue [Heritage District] Specific Plan Policy 1.2).

Title 20 of the Riverside Municipal Code. The City has developed a historical preservation program that is among the most active in the State of California. Riverside's commitment to historical preservation began in 1969 with the adoption of a preservation ordinance, Title 20 of the Riverside Municipal Code (RMC), and the creation of the Cultural Heritage Board.30 Since that time the program has grown to include an ongoing process to survey, record, and designate historical resources; an award-winning historical resources inventory database; historic district design guidelines; educational programs; and a historical preservation plan. The California Office of Historic Preservation has designated Riverside as a Certified Local Government. This distinction ensures that the City's preservation program meets all State and federal standards.

Title 20 of the RMC is the primary body of local historical preservation laws. The purpose of Title 20 is to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation and use of improvements, buildings, structures, signs, objects, features, sites, places, areas, districts, neighborhoods, streets, works of art, natural features, and significant permanent landscaping having special historical, archaeological, cultural, architectural, community, aesthetic, or artistic value in the City. Title 20 of the RMC establishes procedures for preserving, protecting, and designating significant cultural resources should the resource be considered a historical/ cultural resource.

The City of Riverside has two levels of individual historical designation: Cultural Heritage Landmark and Resource or Structure of Merit. The Landmark designation is the City's highest historical designation, while the Resource or Structure of Merit designation is for resources of a

[29] *Magnolia Avenue Specific Plan*. Resolution No. 21931. City of Riverside. November 2009.
[30] *Riverside Municipal Code: Title 20 – Cultural Resources.* City of Riverside. Adopted December 2010. https://www.riversideca.gov/municode/pdf/20/title-20.pdf. (Accessed August 29, 2017).

lower level of significance. The following are the criteria for these two types of resources as defined in the Cultural Resources Ordinance of the RMC, Title 20, Section 20.50, as amended:[31]

Cultural Heritage Landmark Criteria: "Landmark" means any Improvement or Natural Feature that is an exceptional example of a historical, archaeological, cultural, architectural, community, aesthetic or artistic heritage of the City, retains a high degree of integrity, and meets one or more of the following criteria:

1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
2. Is identified with persons or events significant in local, state or national history;
3. Embodies distinctive characteristics of a style, type, period or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
4. Represents the work of a notable builder, designer, or architect, or important creative individual;
5. Embodies elements that possess high artistic values or represents a significant structural or architectural achievement or innovation;
6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning, or cultural landscape;
7. Is one of the last remaining examples in the City, region, State, or nation possessing distinguishing characteristics of an architectural or historical type of specimen; or
8. Has yielded or may likely to yield, information important in history or prehistory.

Resource or Structure of Merit Criteria: "Resource or Structure or Resource of Merit" means any Improvement or Natural Feature which contributes to the broader understanding of the historical, archaeological, cultural, architectural, community, aesthetic or artistic heritage of the City, retains sufficient integrity, and:

1. Has a unique location or singular physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood community or of the City;
2. Is an example of a type of building which was once common but is now rare in its neighborhood, community or area;

[31] *Ibid.*

3. Is connected with a business or use which was once common but is now rare;
4. A Cultural Resource that could be eligible under Landmark Criteria no longer exhibiting a high level of integrity, however, retaining sufficient integrity to convey significance under one or more of the Landmark Criteria;
5. Has yielded or may be likely to yield, information important in history or prehistory; or
6. An improvement or resource that no longer exhibits the high degree of integrity sufficient for Landmark designation, yet still retains sufficient integrity under one or more of the Landmark criteria to convey cultural resource significance as a Structure of Merit.

Historic District: The City of Riverside defines a Historic District as:

1. A concentration, linkage, or continuity of cultural resources, where at least fifty percent of the structures or elements retain significant history integrity (a "geographic Historic District"), or
2. A thematically-related grouping of cultural resources which contribute to each other and are unified aesthetically by plan or physical development, and which have been designated or determined eligible for designation as a historic district by the Historic Preservation Officer, Board, or City Council, or is listed in the National Register of Historic Places or the California Register of Historical Resources, or is a California Historical Landmark or a California Point of Historical Interest (a "thematic Historic District").

In addition to either 1 or 2 above, the area also:

1. Exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, architectural, or natural history;
2. Is identified with persons or events significant in local, State, or national history;
3. Embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship;
4. Represents the work of notable builders, designers, or architects;
5. Embodies a collection of elements of architectural design, detail, materials, or craftsmanship that represents a significant structural or architectural achievement or innovation;
6. Reflects significant geographical patterns, including those associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of park or community planning;
7. Conveys a sense of historic and architectural cohesiveness through its design, setting, materials, workmanship or association; or

8. Has yielded or may be likely to yield, information important in history or prehistory.

Contributors and Non-Contributors: Within a historic district, resources are identified as either "contributors" or "non-contributors." These are identified as follows:

"Contributors" to either a Historic District or a Neighborhood Conservation Area means a building structure within a Historic District or Neighborhood Conservation Area that provides appropriate historic context, historic architecture, historic association or historic value, or is capable of yielding important information about the period. Contributors in Historic Districts and Neighborhood Conservation areas are subject to the Certificate of Appropriateness Process.

"Non-Contributor" to either a Historic District or a Neighborhood Conservation Area means a building structure within a Historic District or Neighborhood Conservation Area that does not provide appropriate historic context, historic architecture, historic association, or historic value, or is not capable of yielding important information about the period, because that building structure:

1. Was not present during the district's or area's period of historic significance; or
2. No longer possesses integrity due to alterations, disturbances, additions, or other changes; and
3. Does not independently meet the designation criteria as defined in this Title.

In accordance with Title 20, a Certificate of Appropriateness is required to alter, demolish, or relocate properties that are designated or determined eligible for designation as a City Cultural Resource.

CBUSP Amendment. Development of the CBU campus and associated facilities is currently administered pursuant to the 2013 CBUSP, adopted March 26, 2013 under Resolution No. 22511 and Ordinance No. 7203 pursuant to specific objectives and policies designed to foster a positive relationship between CBU and the larger community in which it resides.[32] The proposed CBUSP Amendment will replace the 2013 CBUSP in its entirety to facilitate a more urban-style development schema, but the objectives and policies proposed in the CBUSP Amendment mirror those under which CBU development is currently administered.

Additionally, the proposed CBUSP Amendment will replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan* within the CBU

[32] *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. Pages 1, 27, and 29. City of Riverside. Adopted March 26, 2013.

Specific Plan Zone. Two properties west of Monroe Street (Assessors' Parcel Numbers 233-12-0010 and 233-11-0045) will be amended and removed out of the *Magnolia Avenue Specific Plan* and incorporated into the CBUSP Amendment as part of the proposed Project. According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University.[33]

The following objectives and policies pertaining to cultural resources are drawn from the CBUSP Amendment and are applicable to the proposed Project.

Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards outlined [in the CBUSP Amendment] and the *Citywide Design Guidelines and Sign Guidelines.*

Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus identity, while accommodating the University's needs pursuant to its mission.

Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, state, and federal regulations, standards, guidelines, and Table 6-1 [of the CBUSP Amendment].

Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in the CBU Specific Plan, as amended.

Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in the CBU Specific Plan, as amended.

Policy 5.4: Designate a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.

[33] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. Adopted November 10, 2009.

City of Riverside Demolition Permit. Authorization to demolish structures within the City requires issuance of a demolition permit. All applications for demolition permits are reviewed by the City Planning Division of the Community & Economic Development Department for compliance with CEQA. The CEQA review includes a determination of whether any historical, cultural, or archaeological resources may be affected adversely by the proposed demolition. If any significant environmental or cultural resources will be impacted, the demolition request shall require further environmental review by staff, and if necessary, be reviewed by the Cultural Heritage Board.

4.5.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on cultural resources if the proposed Project would:

- (Threshold A) Cause a substantial adverse change in the significance of a historical resource as defined in Section15064.5;
- (Threshold B) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section15064.5;
- (Threshold C) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- (Threshold D) Disturb any human remains, including those interred outside of formal cemeteries.

Methodology

JM Research and Consulting (JMRC) prepared a cultural resources survey in 2012[34] in conjunction with the *2013 CBUSP*.[35] JMRC evaluated all potential resources 45 years old or older and those that would be 45 years old or older by the 2025 horizon of the *2013 CBUSP*. JMRC's work included a cultural resources records search at the Eastern Information Center on the campus of the University of California, Riverside, as well as a literature review and intensive

[34] *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting. 2012.
[35] *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. City of Riverside. March 2013.

field survey. The Riverside City Planning Division conducted Native American Consultation in conjunction with the approval of the 2013 CBUSP per SB 18.

Subsequent to the adoption of the *2013 CBUSP*, Wilkman Historical Services (WHS) prepared a cultural resources survey and evaluation assessment[36] for the proposed CBUSP Amendment[37] to address a revised campus expansion plan under a more urban-style campus model to account for increased student enrollment forecasts. WHS reexamined the JMRC cultural resources report in order to update its data as appropriate for use in relation to the proposed CBUSP Amendment; this effort resulted in specific changes to historic designations of eight (8) of the CBU properties previously addressed in the JMRC report. Additionally, WHS conducted survey of two (2) additional properties (former Riverside Christian Day School/APN 233-110-045 and former Riverside Christian High School which has become the current CBU Health Science Campus/APN 233-120-010) that were not administered by CBU at the time of adoption of the 2013 CBUSP. The Riverside City Planning Division conducted Native American Consultation in conjunction with the approval of the CBUSP Amendment per SB 18 and AB 52. Detailed discussion of the City's consultation with interested Native American Tribes pursuant to AB 52 and SB 18 is provided in Section 4.17, Tribal Cultural Resources of this EIR.

Other than any changes that may take effect in relation to the WHS studies, the JMRC report will continue to serve as the CBUSP Amendment comprehensive cultural resources document. Table 4.5.A *Disposition of Properties Evaluated for Historic Significance* details the results of the historic designation evaluations conducted by JMRC and incorporates updated historic designation evaluations provided by WHS for the properties listed in Table 4.5.B.

4.5.4 Project Design Features

The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions in order to strengthen the campus identity. Development standards of the CBUSP Amendment include height restrictions and setbacks, as detailed in Table 4-2 (Chapter 4), and management recommendations for all properties within the CBU Specific Plan Zone, as detailed in Table 6-1 (Chapter 6). Furthermore, the sign program (Chapter 5), design guidelines (Chapter 7), and implementation methods (Chapter 8) of the CBUSP Amendment outline design elements to guide development to be sensitive to cultural and historic resources.

---

[36] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

[37] *California Baptist University Specific Plan, Public Review Draft.* Chapter 6, Section A. City of Riverside. August 2018.

CBUSP Amendment Design Elements

Chapter 7 of the proposed CBUSP Amendment provides specific design elements to guide the architectural, landscape, site furnishing, streetscape, entrance and corner, fence and wall, open space, lighting, signage, and campus art design to ensure a cohesive, aesthetically pleasing, and safe campus in accordance with the CBUSP Amendment objectives and policies.[38] For the CBU Specific Plan Zone, these design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*.

Architectural design shall apply to all new construction within the CBU Specific Plan Zone, including modifications to existing structures. New construction and modifications to existing structures will consider the relationship and compatibility of a subsequent project with their surroundings through an assessment of the existing site and neighborhood and historic context. To create a consistent aesthetic for the campus, the Yeager Center building, with its architectural style and quality that combine authentic details with contemporary execution, will be used as a base reference for architectural mass, scale, and detail needs to be identified. Prior to the schematic design of any subsequent project, a site analysis would be conducted to form the design parameters. Issues such as land use, interface with adjoining uses, visibility of facilities, cultural and historic resources, architectural character, and landscape and streetscape relationships would be considered. As part of context planning, the potential effect of the new edge development projects on the neighborhood and the *Magnolia Heritage District* would be assessed.

Landscape design shall be implemented to achieve unification encompassing the entire campus area while respecting the area's historic context. Continuity is achieved through the use of hardscape materials, plant materials, and planting character arranged in various scales and intensities. The landscape design guidelines in this section apply to all new construction, infill, and edge development within the CBU Specific Plan Zone.

Streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, Monroe Street, and Diana Avenue will require greater coordination with the City Planning Division and Public Works Department to ensure that any

[38] *California Baptist University Specific Plan, Public Review Draft.* Chapter 7, Section B, Subsection 1. Section C. Section E. City of Riverside. August 2018.

and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements.

CBUSP Amendment Implementation Methods

Chapter 8 of the proposed CBUSP Amendment provides methods, programs, and financing mechanisms to be used to implement the objectives, policies, development standards, and design elements in the CBUSP Amendment.[39] The CBU serves as the responsible party, meaning the University's Finance and Administration Department or other department as designated by the Finance and Administration Department, and the implementation timeframe shall be ongoing as individual subsequent projects are proposed throughout the 2025 horizon of the Specific Plan. These implementation methods serve as self-mitigating project design features required for all future development and improvement projects to or in proximity to historical resources.

General exterior alteration of, addition to, demolition of, and new construction near historical resources shall be avoided to the extent possible and when unavoidable, shall be designed and undertaken in accordance with the *Secretary of Interior's Standards*, as well as Title 20 of the RMC, as outlined above.

All designated and eligible historical resources within the campus shall comply with the development standards and management recommendations outlined in Table 4.5.A *Disposition of Properties Evaluated for Historic Significance*, as outlined below, as well as Title 20 of the RMC.

Neighbors of Woodcraft Historic District includes the Anne Gabriel Library, Harden Square, Palm Drive, James Complex, Central Plant, Garage, Arched Arcade, Magnolia Lawn, and Fortuna Fountain. The Neighbors of Woodcraft Historic District has been identified as a contributing element to the California Baptist University Historic District (Figure 4.5-1). Development of adjoining areas at the southeast edge of the Neighbors of Woodcraft Historic District provide an opportunity to define boundaries of the district and to enhance the components of the complex to avoid obscuring or overshadowing the property. This will be accomplished as appropriate pursuant to Table 4.5.A *Disposition of Properties Evaluated for Historic Significance*.

CBU Historic District is comprised of the Smith & Simmons [dormitory] Halls, the Van Dyne Field House Gymnasium, and the Wallace Book of Life [theatre] Building (Figure 4.5-1). The properties comprising the CBU Historic District individually contribute to the historic values which qualify the CBU Historic District as eligible for the California Register of Historical

[39] *California Baptist University Specific Plan, Public Review Draft.* Chapter 8 Section A-B. City of Riverside. August 2018.

Resources (CRHR). Therefore, additions, alterations, and new construction to these properties shall be designed and undertaken in accordance with the *Secretary of the Interior's Standards* and Title 20 of the RMC.

New development shall be designed to minimize visual impacts, maintain spatial relationship between the Smith & Simmons [dormitory] Halls and Van Dyne Field House Gymnasium, and preserve the imposing statement of the gym on the landscape. Setbacks from adjacent roadways shall be maximized to achieve spatial relationship between the gym and new development and to maintain prominence of the gym.

Design of new development within the CBU Historic District shall be stylistically harmonious within the context in which it is proposed. For example, the architecture and scale of the Wallace Book of Life [theatre] Building must be considered for proposed alterations and additions to this building, as well as in the design of any future development within the CBU Historic District.

Hawthorne House [& Eucalyptus Tree] was constructed in 1889 and remains on campus, with the associated Eucalyptus Tree, as a designated City Landmark. The Hawthorne House may be considered for relocation to a site nearby the CBU campus but not within the Specific Plan area. Any such relocation shall be performed in direct cooperation with the City of Riverside and pursuant to Chapter 20 (Cultural Resources) of the RMC.
The mature Eucalyptus windbreak tree, identified as a related feature of the Hawthorne House, is located in a now-separate parcel to the south (Figure 4.5-1). CBU is required to assess the health and stability of the tree. If the tree is found stable and healthy, CBU shall:

- Care and maintain the tree in its campus landscape program;
- Incorporate the tree in situ into all future subsequent projects for this site;
- Design nearby additions/alterations or roadway improvements to avoid or limit disturbance to the tree such as nearby excavation/grading; and
- If necessary, realign the existing roadway or convert the drive to a pedestrian pathway or open space area/network to accommodate the tree.

Rose Garden Village and Royal Rose (Tower Hall) may not be contemporaneous. Whereas the Rose Garden Village is an exceptional example of historic cultural and community heritage, circa 1961, eligible for both the National and California Registers, the Royal Rose (Tower Hall), circa 1979, is clearly different from, and does not contribute to the National and California Register-eligible Rose Garden Village (Table 4.5.B); however, modifications to the Royal Rose

(Tower Hall) shall be given consideration, as described below, on account of its proximity to the Rose Garden Village.[40]

Private open space patios and balconies and other character-defining features of the Rose Garden Village/Royal Rose shall only be modified pursuant to Table 4.5.A *Disposition of Properties Evaluated for Historic Significance*. If necessary, the path of the asphalt drive shall be altered, and its potential effect on important landscape features and materials, including Pat Nixon and Frank Miller Roses, or its potential to compromise contribution to the village scale and character of this historic resource shall occur, in accordance with Table 4.5.A *Disposition of Properties Evaluated for Historic Significance* and Title 20 of the RMC.

Exterior alteration of and additions to existing buildings, demolition, and new construction shall be avoided to the extent possible, and when unavoidable, shall be designed and undertaken in accordance with the *Secretary of the Interior's Standards* and Title 20 of the RMC. Should demolition be proposed, every effort must be made to preserve in place, or relocate, the Big Ben clock tower to Rose Garden Village, as detailed in Table 4.5.A *Disposition of Properties Evaluated for Historic Significance*.

All historic plaques and markers shall be retained in place. Those that have been previously removed shall be reinstalled in their original location or close proximity, if known.

CBU shall contract with a qualified rosarian to survey the property; determine if Pat Nixon, Frank Miller, or other important rose varieties are extant; and provide recommendations, as applicable, for the long-term care, maintenance, preservation, protection, and treatment during construction activity. If important rose varieties are identified, CBU shall:

- Incorporate recommendations for care and maintenance into its campus landscape program;
- Incorporate identified plants in situ into all future subsequent projects for this site;
- Design nearby additions/alterations or roadway improvements to avoid or limit disturbance; and
- Be further guided by rosarian recommendations.

[40] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Pages 1 through 4 and 16. Wilkman Historical Services. August 2018.

Table 4.5.A details all known cultural resources within the CBU Specific Plan Zone and provides management recommendations based on future development facilitated by the proposed CBUSP Amendment.

4.5.5 Environmental Impacts Before Mitigation

Threshold A: Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

The WHS cultural resources survey and evaluation assessment provides updates to historic designations of eight (8) CBU properties previously addressed in the JMRC report,[41] as well as new historic designation evaluations to two (2) additional properties not administered by CBU at the time of adoption of the 2013 CBUSP (Table 4.5.B).[42]

Table 4.5.B
Updates to Historic Designations of CBU Properties since Adoption of the 2013 CBUSP

Property Name	Address and APN	JMRC Status Code	WHS Status Code	Comments
Former Riverside Christian High School (Now CBU College of Health Science)	3532 Monroe Street 233-120-010	N/A	6Z	New evaluation for property acquired subsequent to preparation of 2013 CBUSP. Found ineligible for historic designation.
Former Riverside Christian Day School (Wellness Center)	3626 Monroe Street 233-110-045	N/A	6Z	New evaluation for property acquired subsequent to preparation of 2013 CBUSP. Found ineligible for historic designation.
Former Royal Rose Apartments (Now Tower Hall)	3720 Adams Street 231-040-027	3S	6Z	JMRC report included this property with the adjacent Rose Garden Village apartments as a National/California Register eligible property. Found ineligible for historic designation by WHS, based largely on lack of design cohesion with Rose Garden Village. However, consideration must be given to the preservation in place or relocation of the Big Ben clock tower in any future redevelopment of the property. Also, any further development on the property must be sensitive to the architecture, scale, massing, and landscaping of Rose Garden Village.

[41] *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting. 2012.
[42] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

Table 4.5.B
Updates to Historic Designations of CBU Properties since Adoption of the 2013 CBUSP

Property Name	Address and APN	JMRC Status Code	WHS Status Code	Comments
Historic Mailbox	8432 Magnolia Avenue 231-030-029	N/A	6Z	Not assigned a CHR Status Code in JMRC report; however, a mitigation measure called for the preservation of the mailbox as an aspect of the Neighbors of Woodcraft Historic District. WHS research found it to be of recent origin and not of historical value.
Former Knights of Pythias Hall (Now Bourns Engineering Laboratory)	3750 Adams Street 231-040-004	5S2	6Z	Determined eligible for historic designation by the JMRC report as a rare example of a fraternal hall. Found ineligible for historic designation by WHS based on presence of better examples of fraternal halls in the City of Riverside.
Physical Plant Maintenance Shops	8431 Diana Avenue 231-070-007	6L	6Z	Recommended for consideration in planning process due to adjacent historic Free Methodist Church. RFMC was demolished in 2015, negating need for 6L status code, so this concern is no longer applicable. WHS changed the code to 6Z. Plan is to remove this facility by 2020. Consideration must be given to monitoring any future grading associated with the redevelopment of the site in regards to potential archaeological materials that may exist in the vicinity of the former Riverside Lower Canal alignment (**MM-CUL-1)**.
Lancer Arms	8432 Magnolia Avenue 231-070-017	6L	6L	Any further development on the property must be sensitive to the architecture, scale, massing, and landscaping of the adjacent Smith and Simons Halls historic resources, as detailed in Section 4.5.4 of this EIR. Consideration must also be given to monitoring any future grading associated with the redevelopment of the site in regards to potential archaeological materials that may exist in the vicinity of the former Riverside Lower Canal alignment (**MM-CUL-1)**.
Lambeth House (Now School of Nursing)	8308 Magnolia Avenue 231-040-025	6L	6Z	Assigned 6L status code in 2012 JMRC report due to proximity to Knights of Pythias property. Knights of Pythias property subsequently found to not qualify for historic designation, negating the need for 6L status code.
Former Lutheran Church of the Cross (Interim use as Riverside Christian School)	8775 Magnolia Avenue 193-253-013	6L	6L	Recommended for consideration in planning process due to the possibility the church may be found to be a contributor to a future Mid-Century Modern thematic historic district. While WHS retained the 6L CHR Status Code, its purpose was altered to reference the preservation in place or relocation of the existing bell tower on the property.

Table 4.5.B
Updates to Historic Designations of CBU Properties since Adoption of the 2013 CBUSP

Property Name	Address and APN	JMRC Status Code	WHS Status Code	Comments
Lancer Outdoor Athletic Complex	8432 Magnolia Avenue 231-050-005	N/A	6L	Assigned 6L CHR Status Code by WHS with the intent of encouraging sensitivity to the adjacent historic Van Dyne gymnasium in any future development on the athletic complex site. Any proposed ground disturbance in native soils must be monitored for cultural resources due to potential for subsurface agricultural materials associated with the Riverside Lower Canal (**MM-CUL-1)**.

Source: *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Pages 1 through 4. Wilkman Historical Services. August 2018.

Status Codes:
N/A: Not Applicable.
3S: Appears eligible for the National Register of Historic Places through a survey evaluation.
5S2: Individual property that is eligible for local historical resource listing or designation.
6L: Determined to be ineligible for historic designation through local government review process, may warrant special consideration in local planning..
6Z: Determined to be ineligible for the National Register of Historic Places, the California Register of Historical Resources, or Local designation through survey evaluation.

Other than any changes to the status of CBU properties, in relation to the WHS cultural resources survey and evaluation assessment detailed in Table 4.5.B, the JMRC report serves as the CBUSP Amendment comprehensive cultural resources document. Two additional properties surveyed by JMRC are no longer extant within the CBU Specific Plan Zone. Pursuant to Title 20 of the RMC and the CEQA analysis, the Cooper House at 3690 Adams Street has been relocated to 2909 Lime Street in Riverside,[43] and the Riverside Free Methodist Church at 8431 Diana Avenue has been demolished to make room for the CBU Events Center.[44] Based on the JMRC and WHS cultural resources investigations, National Register, California Register, and local register-eligible resources within the CBU Specific Plan Zone are summarized in Table 4.5.C.

In addition, one stand pipe located in proximity of the athletic fields may be the only surficial remnant of the Riverside Lower Canal within the CBU Specific Plan Zone; however, the Riverside Lower Canal is considered no longer extant within the CBU Specific Plan Zone.

[43] *Initial Study and Mitigated Negative Declaration for the William A. Cooper House Relocation.* City of Riverside. July 13, 2013.

[44] *Draft Environmental Impact Report for the Riverside Free Methodist Church Demolition Project, SCH No. 2014121011.* City of Riverside. March 25, 2015.

THIS PAGE INTENTIONALLY LEFT BLANK

Table 4.5.C
National Register, California Register, and Local Register-Eligible Cultural Resources

Name	Address	Date of Construction	Designer/ Builder	Original Use	Current Use	2013 CBUSP (JMRC)[45]	Proposed CBUSP Amendment (WHS)[46]
Neighbors of Woodcraft Historic District	8432 Magnolia Avenue	1920-1938	Henry L. Jekel	Retirement Home	Mixed Use Campus	National Register-Eligible	National Register-Eligible
CBU Historic District	8432 Magnolia Avenue	1920-1973	Jekel, Skaggs, Cowan, and Bussey	Academic/ Residential	Academic/ Residential	California Register-Eligible	California Register-Eligible
Smith & Simmons [Dormitory] Halls[a]	8525 and 8555 Diana Avenue	1968	Cowan and Bussey	Dormitories	Dormitories	California Register-Eligible	California Register-Eligible
Van Dyne Field House Gymnasium[a]	8432 Magnolia Avenue	1968	Cowan and Bussey	Gymnasium	Gymnasium	California Register-Eligible	California Register-Eligible
Wallace Book of Life [Theater] Building[a]	8432 Magnolia Avenue	1973	I. Robert Skaggs	Auditorium/ Theatre	Auditorium/ Theatre	California Register-Eligible	California Register-Eligible
Knights of Pythias Hall (Bourns Lab)[b]	3750 Adams Street	1966	Cowan, Bussey, and Wiehe	Fraternal Hall	Engineering Laboratory	California Register-Eligible	Re-evaluated ineligible for historic designation.

[45] *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting. 2012.
[46] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

Table 4.5.C
National Register, California Register, and Local Register-Eligible Cultural Resources

Name	Address	Date of Construction	Designer/ Builder	Original Use	Current Use	2013 CBUSP (JMRC)[45]	Proposed CBUSP Amendment (WHS)[46]
Rose Garden Village/Royal Rose (Tower Hall)	3720 Adams Street and 3668 Adams Street	1961-1979	L.C. Majors, W.F. Moody, and S. Bob	Senior Apartments	Student Housing	California Register-Eligible	National Register-Eligible and California Register-Eligible (Rose Garden Village only) The Royal Rose (Tower Hall) has been re-evaluated ineligible for historic designation, but it will receive special consideration in the planning process.
Hawthorne House & Eucalyptus Tree	3747 Monroe Street	1889-1890	A.C. Willard	Residence	CBU Campus Operations	Local Register-Eligible	Local Register-Eligible
Cooper House	3690 Adams Street	1909	Eastern Building Company	Residence	Relocated-No longer extant	Local Register-Eligible	Not applicable: The resource has been relocated and is no longer extant within the CBU Specific Plan Zone.
Riverside Free Methodist Church	8431 Diana Avenue	1963-1964	D. Bragg & H. Marsh	Church	Demolished-No longer extant	Local Register-Eligible	Not applicable: The resource has been demolished and is no longer extant within the CBU Specific Plan Zone.

[a] Contributor to the CBU Historic District [55, 56]
[b] Non-contributor to the CBU Historic District [55, 56]

The proposed Project includes an amendment to the 2013 CBUSP to facilitate a revised campus expansion plan under a more urban-style campus model to account for increased student enrollment forecasts. The JMRC report for the 2013 CBUSP identified ten (10) cultural resources to be significant and therefore eligible for either the national, State, or local register. As listed in Table 4.5.B, the WHS report for the proposed CBUSP Amendment concluded select cultural resources previously identified as significant by the JMRC report are not significant and therefore do not qualify for national, State, or local register eligibility. Two additional cultural resources previously identified by JMRC as significant and therefore eligible for the local register have since been relocated or demolished and are no longer extant within the CBU Specific Plan Zone (Table 4.5.C).

The CBUSP Amendment does not propose a specific development project; it does, however, propose a framework under which subsequent development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment. For example, it is the intent of CBU to relocate the Hawthorne House to a currently unidentified site nearby the CBU campus but not necessarily within the Specific Plan Zone. Additionally, CBU anticipates the need to conduct alterations to the Rose Garden Village to better accommodate the anticipated need for improved student housing.

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

In accordance with Table 4.5.C, *National Register, California Register, and Local Register-Eligible Cultural Resources,* and the WHS cultural resources survey and evaluation assessment for the proposed CBUSP Amendment, the following University facilities are historical resources pursuant to CEQA. Modifications to the following CBU historical resources [from Table 4.5.C] would require a Certificate of Appropriateness pursuant to Title 20 of the RMC:

- Neighbors of Woodcraft Historic District
- CBU Historic District

- Smith & Simmons [Dormitory] Halls
- Van Dyne Field House Gymnasium
- Wallace Book of Life [Theatre] Building
- Rose Garden Village
- Hawthorne House & Eucalyptus Tree

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

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

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

This archaeological evaluation is based on the cultural resources survey conducted in 2012 by JMRC[47] for the 2013 CBUSP and a 2018 WHS cultural resources survey and evaluation work for the proposed CBUSP Amendment.[48] Through these investigations, archaeologists located the following artifacts within the CBU Specific Plan Zone:

- Three historic bottles were provided by CBU staff from a cistern associated with a residence that pre-dated the Free Methodist Church on the site now occupied by the Events Center.

[47] *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting. 2012.
[48] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update*. Wilkman Historical Services. August 2018.

- One granitic ground stone fragment, likely prehistoric, located along the former Riverside Lower Canal alignment.
- One historic irrigation feature possibly associated with the Riverside Lower Canal found in the area of the campus soccer field.
- Sixty historic artifacts, primarily bottles, uncovered near the Campus Central Plant during a previous construction project in that area.

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

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

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

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

As defined in CEQA Guidelines Section 15064.5(a)(3)(D), significant paleontological resources are generally considered to be historical resources. Subsequent development projects facilitated by the proposed CBUSP Amendment could result in substantial earthwork and other ground-

disturbing activities. However, according to the *Riverside General Plan 2025*, significant fossil bearing localities in the City are generally located along the Santa Ana River and south of Mockingbird Canyon Reservoir.[49] The CBU campus is not located in the immediate vicinity of either the Santa Ana River or Mockingbird Canyon Reservoir and therefore is not located in the immediate vicinity of significant fossil bearing localities. Additionally, the CBU campus is completely urbanized and has been previously graded, so the likelihood of encountering significant paleontological resources from implementation of the CBUSP Amendment is low.

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

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

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

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

[49] *Chapter 5.5-Cultural Resources. City of Riverside General Plan and Supporting Documents EIR.* Pages 5.5-3 and 5.5-4. City of Riverside. July 2007.

Due to the Project site being previously developed, the likelihood of encountering human remains is minimal. In the event that human remains (or remains that may be human) are discovered at the Project site during grading or earthmoving activities, no further disturbance shall occur until the Project proponent has notified the Riverside County Coroner and the City of Riverside Community & Economic Development Department immediately, and the County Coroner has made a determination of origin and disposition.[50] Section 7050.5 of the California Health and Safety Code requires that excavation be stopped in the vicinity of the discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the Project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (PRC Section 5097). The coroner shall contact the NAHC to determine the most likely descendant(s) (MLDs). The MLDs shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The Disposition of the remains shall be overseen by the MLDs to determine the most appropriate means of treating the human remains and any associated grave artifacts.

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

4.5.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant impacts. The following mitigation measures have been evaluated for feasibility and are incorporated in order to reduce potentially significant impacts related to the the discovery of unknown archeological resources.

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

- Orient the main entrance to the Hawthorne House toward Magnolia Avenue, as was originally.
- The receiver is located within 1,000 feet of the Magnolia Avenue/Monroe intersection

[50] *Division 7, Dead Bodies;* Chapter 2, *General Provisions*, § 7050.5, California Health and Safety Code.

- 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.
- 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 Design Review:

- Entry Doors: Where an entry door is to be removed, the former location of the door will be retained as a recessed space, with a smooth stucco finish painted the same color as the former door. Wooden trim associated with the former door will be retained and painted the same color as the recess.
- Sliding Patio Doors: Any replacement of eight-foot-wide patio doors shall occur with clear anodized storefront creating a vertically-divided opening framed in clear anodized aluminum. The lower glass of the storefront shall be

given a frosted opaque finish as visible from the exterior. On the interior, this lower area shall be mated to an interior wall finished in drywall to match the balance of the interior walls. The balance of the eight-foot-wide openings shall be given a stucco finish to match the balance of the existing building walls.

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

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

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

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

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

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

MM-CUL-4: If archaeological resources are encountered during ground-disturbing activities, the archaeologist(s) shall be empowered to temporarily divert or redirect ground-

disturbing activities in the vicinity in order to make an evaluation of the find. The archaeological monitor(s) shall notify the City, applicant, and appropriate Native American tribes should any such discovery be made during the course of ground-disturbing activities.

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

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

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

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

MM-CUL-5: If 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 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 City Planning Division.

4.5.7 Environmental Impacts After Mitigation Is Incorporated

Development standards outlined in Table 4.5.A, *Disposition of Properties Surveyed for Historic Significance,* of this Draft EIR (Table 4-5 in the CBUSP Amendment), in addition to the

objectives and policies (Chapter 2), development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) presented in the CBUSP Amendment reduce impacts to historical resources from implementation of the CBUSP Amendment to less than significant levels. In addition, incorporation of mitigation measures **MM-CUL-1, MM-CUL-2, and MM-CUL-3** presented in Section 4.5.6 of this Draft EIR would reduce impacts to archaeological resources from implementation of the CBUSP Amendment to less than significant levels.

4.5.8 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Bean, Lowell J. and Charles R. Smith. Gabrielino. In *Handbook of North American Indians, Volume 8, California.* Pp. 538-549. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

Bean, Lowell J. and Florence C. Shipek. Luiseño. In *Handbook of North American Indians, Volume 8, California.* Pp. 550-563. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

California Public Resources Code Section 5024.1. State Parks and Monuments: Historical Resources.

City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside, *California Baptist University Specific Plan Amendment, Public Review Draft.* August 2018.

City of Riverside, *City of Riverside General Plan 2025*. November 2007, Amended November 2012 and March 2013.

City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. December 2007.

City of Riverside, *Draft Environmental Impact Report for the Riverside Free Methodist Church Demolition Project, SCH No. 2014121011.* March 25, 2015.

City of Riverside, *Initial Study and Mitigated Negative Declaration for the California Baptist University Specific Plan.* January 2012.

City of Riverside, *Magnolia Avenue Specific Plan*. Resolution No. 21931. Adopted November 2009.

City of Riverside, *Riverside Municipal Code: Title 20 – Cultural Resources*. Adopted December 2010.

JM Research and Consulting, *Cultural Resources Survey, California Baptist University Specific Plan,* 2012.

Kroeber, Alfred L. *Handbook of the Indians of California, Bureau of American Ethnology Bulletin 78*. Smithsonian Institution, Washington D.C. 1925.

Moratto, Michael J. California Archaeology. San Diego: Academic Press. 2004.

NPS (National Park Service). *Guidelines for Completing National Register of Historic Places Forms*. National Register Bulletin 16, Part A. U.S. Department of the Interior, National Park Service. 1991.

O'Connell, J. F., P. J. Wilke, T. F. King, and C. L. Mix (Eds.). *Perris Reservoir Archaeology: Late Prehistoric Demographic Change in Southeastern California.* Sacramento: Department of Parks and Recreation Archaeological Reports, Page 14. 1974.

Oxendine, Joan. *The Luiseno Village During the Late Prehistoric Era.* Unpublished Ph.D. Dissertation, Department of Anthropology, University of California, Riverside. 1983.

W. McCawley. The First Angelinos: the Gabrielino Indians of Los Angeles. Morongo Indian Reservation, Banning: Malki Museum Press. 1996.

Weeks, Kay D. and Anne E. Grimmer. *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.* United States Department of the Interior, National Parks Service, Technical Preservation Services. Washington D.C. 1995.

Wilke, P. J. *Late Prehistoric Change in Land Use Patterns at Perris Reservoir.* Los Angeles: University of California, Los Angeles Archaeological Survey Annual Report. Pp. 155-164. 1971.

Wilkman Historical Services, *California Baptist University Free Methodist Church Property Cultural Resources Impacts Report*, November 17, 2014.

Wilkman Historical Services, *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* August 2018.

THIS PAGE INTENTIONALLY LEFT BLANK

4.6 GEOLOGY AND SOILS

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential impacts with regards to fault rupture, seismic shaking, liquefaction, landslides, erosion or unstable slopes, settlement, expansive soils, or other soils or geologic conditions from implementation of the proposed Project. No comments regarding geology and soils were received in response to the NOP.

4.6.1 Setting

Existing Conditions

Site Geology. The Project site is graded and relatively level resulting from previous development on the CBU campus. The site generally slopes from south to north, with an approximate elevation range between 780 and 830 feet above mean sea level. The Project site is located at the northern portion of the Peninsular Range Geomorphic Province of California. The Peninsular Range Geomorphic Province is one of the major geologic provinces of Southern California and is characterized by a series of mountain ranges separated by northwest-trending valleys sub-parallel to faults branching from the San Andreas Fault.

Site Soils. The parent material of the soils on the Project site is granitic alluvium. The Project site is underlain by a combination of old alluvial fan deposits in the east and west corners of the CBU campus and young alluvial fan deposits through the majority of the CBU campus footprint (Figure 4.6-1).[1] Five soil types are mapped at the Project site: Arlington fine sandy loam, deep, with 2 to 8 percent slopes; Arlington loam, deep, with 0 to 5 percent slopes; Hanford coarse sandy loam with 0 to 2 percent slopes; Hanford fine sandy loam with 0 to 2 percent slopes; and Buchenau loam, slightly saline-alkali, with 0 to 2 percent slopes (Figure 4.6-2).[2] However, due to on-site development, the site may contain fill that is inconsistent with the mapped soils.

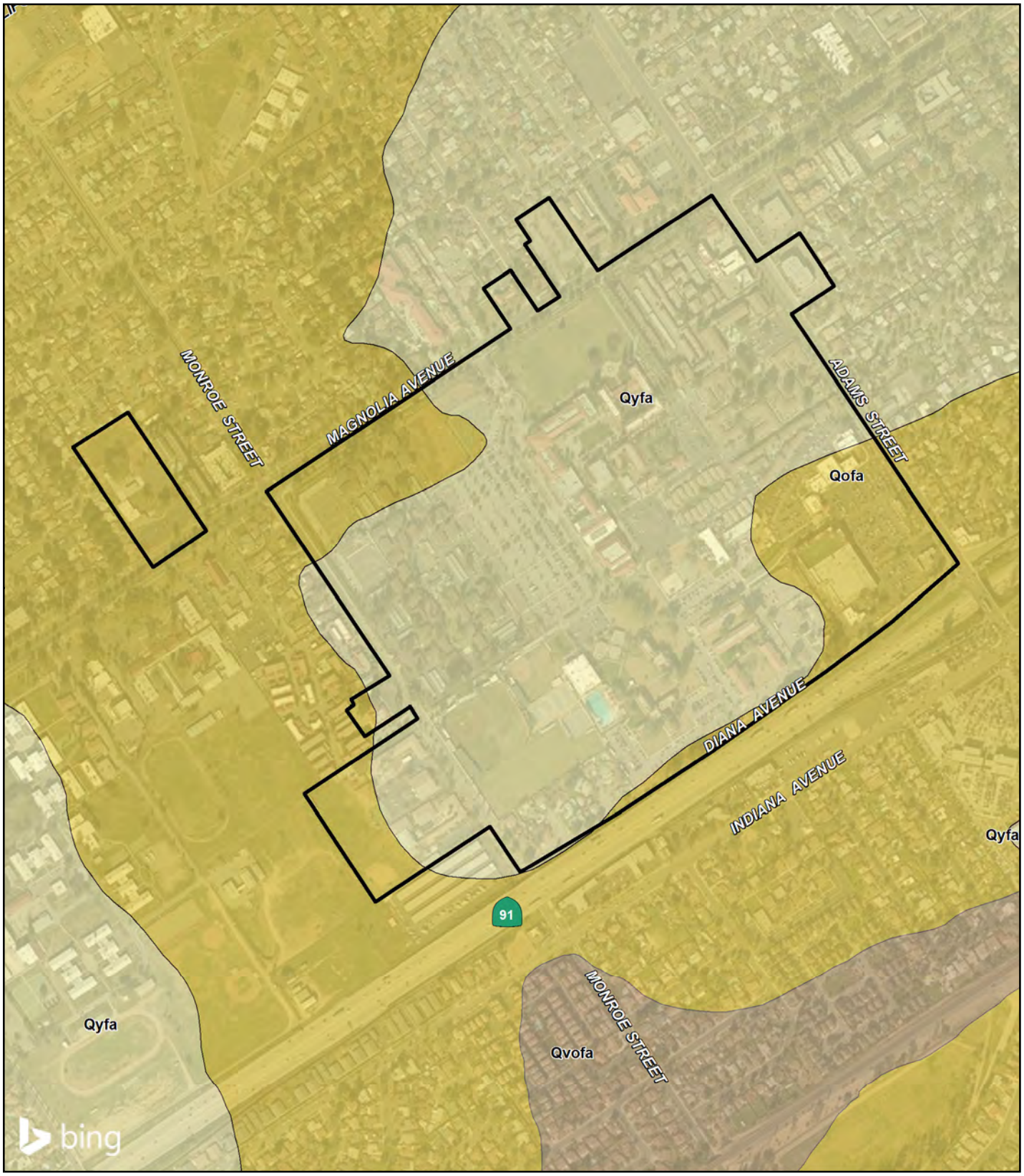
Faulting and Seismicity. The vast majority of earthquake damage is caused by ground shaking. The amount of shaking depends on the size, location, and distance from the earthquake epicenter. In general, shaking and damage decrease with distance from the fault, although they are also affected by the orientation of the fault and the localized geology and soils beneath a particular site.

---

1 *Geologic Map of Riverside West, California 7.5' Quadrangle.* Riverside County, California. United States Geological Survey.

2 *Web Soil Survey.* U.S. Department of Agriculture, Natural Resources Conservation Service. 2013. http://websoilsurvey.nrcs.usda.gov/app/. (Accessed February 28, 2018).

THIS PAGE INTENTIONALLY LEFT BLANK



LSA

LEGEND

Project Area

Geology

Qyfa; Young alluvial fan deposits, arenaceous

Qofa; Old alluvial fan deposits, arenaceous

Qvofa; Very old alluvial fan deposits, arenaceous

N

0 350 700

FEET

SOURCE: USGS, Geologic Map of Riverside West 7.5' Quad, Riverside County, CA., Version 1.0.

I:\CTR1501\Reports\EIR\fig4-6-1_Geology.mxd (8/8/2018)

FIGURE 4.6-1

California Baptist University
Specific Plan Amendment Project

Project Geology

THIS PAGE INTENTIONALLY LEFT BLANK

LSA

LEGEND

Project Area

Soils

- AoC;Arlington fine sandy loam, deep, 2-8% slopes
- ArB;Arlington loam, deep, 0-5% slopes
- BhA;Buchenau loam, slightly saline-alkali, 0-2% slopes
- HcA;Hanford coarse sandy loam, 0-2% slopes
- HgA;Hanford fine sandy loam, 0-2% slopes

N

0 350 700

FEET

SOURCE: Bing Aerial, 2015; Soil Data Mart, 2003.

I:\CTR1501\Reports\EIR\fig4-6-2_Soils.mxd (8/15/2018)

FIGURE 4.6-2

California Baptist University
Specific Plan Amendment Project

Project Soils

THIS PAGE INTENTIONALLY LEFT BLANK

The proposed Project site, like the rest of Southern California, is located within a seismically active region as a result of being located near the active margin between the North American and Pacific tectonic plates. The principal source of seismic activity is movement along the northwest-trending regional fault systems such as the San Andreas, San Jacinto, Elsinore, and Imperial Fault Zones.

By definition of the California Geological Survey, an active fault is one which has had surface displacement within Holocene time (about the last 11,000 years). This definition is used in delineating Earthquake Fault Zones as mandated by the Alquist-Priolo Geologic Hazards Zones Act of 1972 and as most recently revised in 2007 as the Alquist-Priolo Earthquake Fault Zoning Act and Earthquake Fault Zones. The intent of this act is to require fault investigations on sites located within Earthquake Fault Zones to ensure that certain inhabited structures are not constructed across the traces of active faults.

No Alquist-Priolo Earthquake Fault Zones exist within the Project site or within the City. While no known active or potentially active faults traverse the City and its Sphere of Influence, several faults in the region have the potential to produce seismic impacts within the City. Three significant active faults (Elsinore Fault, San Jacinto Fault, and San Andreas Fault) are located within 20 miles of the City.

- The Elsinore Fault is approximately 9.5 miles southwest of the Project site. The Elsinore Fault extends approximately four miles west of Lake Mathews and Corona and south into the City of Lake Elsinore. The Elsinore Fault is estimated to have the capability of producing up to 6.0 magnitude (M) earthquake.

- The San Jacinto Fault is approximately 12.5 miles northeast of the Project site. The San Jacinto Fault runs more than 125 miles, from northwest of El Centro in Imperial County to northwest of San Bernardino, passing through the intersection of Interstates 10 and 215, the City of Loma Linda, and the Box Springs Mountains. The San Jacinto Fault is estimated to have a capability of producing up to a 7.0M earthquake.

- The San Andreas Fault runs along the southwest margin of the San Bernardino Mountains and is approximately 20 miles northeast of the Project site. The San Andreas Fault extends 600 miles from Eureka in Northern California's Humboldt County south to the Mexican border. The San Andreas Fault is estimated to have the capability of producing up to an 8.3-M earthquake.

Although no active faults are located within the Project site, one northwest-southeast trending unnamed fault is located approximately six (6) miles east of the Project site,[3] along the State Route 60/Interstate 215 freeway junction.

Thus, as is the case of most areas of Southern California, the Project site is situated in a seismically active region and ground-shaking resulting from earthquakes associated with nearby and more distant faults may occur at the Project site. Seismic activity associated with active faults can be expected to generate moderate to strong ground shaking within the City, including the Project site.

Surface Rupture. Surface rupture occurs where displacement or fissuring occurs along a fault zone. While ground shaking is the main source of damage in earthquakes, ground rupture from fault movement can cause substantial damage to structures or facilities located too close to a rupturing fault. It is difficult to reduce the hazards of surface rupture through structural design. The primary method to avoid this hazard is to set structures and facilities back [away] from active faults.

Faults throughout southern California have formed over millions of years. Some of these faults are considered inactive under present geologic conditions, and other faults are known to be active.[4] Such faults have either generated earthquakes in historic times (200 years), or indicate movement within the last 11,000 years. Faults that have moved in the relatively recent geological past are generally presumed to be the most likely to cause damaging earthquakes in the lifetimes of residents, buildings, or communities. Surface rupture typically occurs less than a mile from the moving fault, and the closest active fault in relation to the Project site is a northwest-southeast trending unnamed fault located along the State Route 60/Interstate 215 freeway junction, approximately six (6) miles east of the Project site. Therefore, ground surface rupture is not an identified seismic hazard within the Project limits.

Liquefaction. According to the City's *General Plan 2025* EIR, the Project site is located in an area identified as having a liquefaction potential ranging from low to high.[5] Liquefaction occurs primarily in saturated, loose, fine-to-medium-grained alluvial soils in areas where the groundwater table is within 50 feet of the surface. Shaking suddenly causes soils to lose strength

[3] *Section 5.6-Geology and Soils.* City of Riverside General Plan and Supporting Documents Environmental Impact Report. Pages 5.6-16 to 5.6-18. City of Riverside. November 2007.

[4] The Alquist-Priolo Earthquake Fault Zoning Act defines *active faults* as those that show proven displacement of the ground surface within about the last 11,000 years. *Potentially active faults* are those that show evidence of movement within the last 1.6 million years.

[5] *Section 5.6-Geology and Soils.* City of Riverside General Plan and Supporting Documents Environmental Impact Report. Figure 5.6-3. City of Riverside. November 2007.

and behave as a liquid. Liquefaction-related effects include loss of bearing strength, lateral spreading, and flow failures or slumping.

The implementation of standard engineering and construction protocols that are required in areas that are prone to liquefaction would reduce seismic impacts from liquefaction. All future development, including modifications to existing CBU structures and facilities, will be designed and constructed to current California Building Code standards to anticipate impacts associated with liquefaction.

Subsidence and Seismic Settlement. Ground subsidence is typically a gradual settling or sinking of the ground surface with little or no horizontal movement, although fissures (cracks and separations) can result from lowering of the ground surface. The common causes of subsidence that can produce small or local collapses to broad regional subsidence include:

- Dewatering of peat or organic soils;
- Dissolution in limestone aquifers;
- First-time wetting of dry low-density soils (hydrocompaction);
- Natural compaction;
- Liquefaction;
- Crustal deformation;
- Ground shaking;
- Subterranean mining; and
- Withdrawal of fluids (groundwater, petroleum, or geothermal).

Most of the damage caused by subsidence is the result of oil, gas, or groundwater extraction from below the ground surface, or the organic decomposition of peat deposits. Ground subsidence may occur as a response to natural forces such as earthquake movements, which can cause abrupt elevation changes of several feet or densification of low density granular soils during an earthquake event that may cause several inches of settlement. The degree to which the Project site would be susceptible to subsidence and seismic settlement is dependent on the type of soil underlying the specific development area within the Project site. As there are five (5) soil types underlying the Project site, the heterogeneous nature of these soils requires evaluation and management of subsidence risk on a site-by site basis as future development and improvements are proposed under the CBUSP Amendment.

Landslides/Slope Stability. Factors that contribute to slope failure include slope height and steepness, shear strength and orientation of weak layers in the underlying geologic units, and pore water pressures. The relatively flat-lying topography of the Project site renders it unlikely to

be subject to landslides or lateral spreading. Pursuant to CAL-OSHA excavation standards, temporary slopes for construction should be managed according to applicable safety and building regulations.

Compressible, Expansive and Collapsible Soils. Alluvial soil is formed from water-transported sediments, such as river sediments. Although the site is underlain with several feet of artificial fill from prior on-site development, beneath the artificial fill exists alluvial soils from fans emanating from nearby hillsides.

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

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

Hydroconsolidation, or soil collapse, typically occurs in recently deposited Holocene (less than 11,000 years before present time) soils that were deposited in an arid or semi-arid environment. Soils prone to collapse are commonly associated with man-made fill, wind-laid sands and silts, and alluvial fan and mudflow sediments deposited during flash floods. Sudden substantial settlement may occur when saturated, collapsible soils lose their cohesion. An increase in surface water infiltration, such as from irrigation or a rise in the groundwater table, combined with the weight of a building or structure, may initiate settlement, causing foundations and walls to crack.

Due to the placement of artificial fill on the Project site from prior development, there is little possibility that the upper soil layers will be saturated by static groundwater. However, it is possible soil within localized areas could become saturated from long-term landscape irrigation, changes in site drainage, storm water basins, septic system use, or a pipe leak.

4.6.2 Related Regulations

Federal Regulations

There are no federal regulations applicable to geology and soils with regard to the proposed Project.

State Regulations

Alquist-Priolo Earthquake Fault Zoning Act. The major State legislation regarding earthquake fault zones is the *Alquist-Priolo Earthquake Fault Zoning Act* (A-P Act). In 1972, the State of California began delineating "Earthquake Fault Zones" (called Special Studies Zones prior to 1994) around and along faults that are "sufficiently active" and "well defined" to reduce fault-rupture risks to structures for human occupancy.[6] The boundary of an "Earthquake Fault Zone" is generally 500 feet from major active faults and from 200 to 300 feet from well-defined minor faults. The mapping of active faults has been completed by the State Geologist, and these maps are distributed to all affected cities, counties, and State agencies for their use in developing planning policies and controlling renovation or new construction. Before a project can be permitted within an identified Earthquake Fault Zone, cities and counties must require a geologic investigation to demonstrate that proposed buildings will not be constructed across active faults. A site-specific evaluation and written report must be prepared by a licensed geologist. If an active fault is identified, a structure intended for human occupancy cannot be placed over the trace of the fault and must be set back from the fault.

The A-P Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards.

Seismic Hazards Mapping Act. Passed in 1990, the Seismic Hazards Mapping Act (SHMA) addresses non-surface fault rupture earthquake hazards, including strong ground shaking, liquefaction, and seismically induced landslides. The California Geological Survey (CGS) is the principal State agency charged with implementing the 1990 SHMA. Pursuant to the SHMA, the CGS is directed to provide local governments with seismic hazard zone maps that identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures. The goal is to minimize loss of life and property by identifying and mitigating seismic hazards. The seismic hazard zones delineated by the CGS are referred to as "zones of required investigation." Site-specific geotechnical hazard investigations are required by SHMA when construction projects fall within these areas.

Natural Hazards Disclosure Act, effective June 1, 1998, requires that sellers of real property and their agents provide prospective buyers with a "Natural Hazard Disclosure Statement" when the property being sold lies within one or more State-mapped hazard areas. If a property is located in a Seismic Hazard Zone as shown on a map issued by the State Geologist, the seller or the seller's agent must disclose this fact to potential buyers.

[6] California Public Resources Code Sections 2621–2630.

California Civil Code Section 1103-1103.4 applies to the transfers of real property between private parties, as defined therein, and requires notification upon transfer if the property is affected by one or more natural hazards. The following potential hazards must be disclosed, if known: Federal Emergency Management Agency flood hazard areas, dam failure inundation areas, very high fire hazard severity zone, wildland area with forest fire risk, earthquake fault zone, and seismic hazard zones including landslide and liquefaction on a standardized "Natural Hazard Disclosure Statement" (Section 1103.2).

Uniform Building Code (UBC) encompasses approximately half the State building codes in the United States, including California. Published by the International Conference of Building Officials, the UBC has been adopted by the State legislature together with Additions, Amendments, and Repeals to address the specific building conditions and structural requirements in California.

California Building Code California Code of Regulations (CCR), Title 24, Part 2, the California Building Code (CBC), establishes minimum standards for building design in the State, and it is consistent with or more stringent that UBC requirements. Local codes are permitted to be more restrictive than Title 24, but are required to be no less restrictive. The CBC is designed and implemented to improve building safety, sustainability, and consistency, and to integrate new technology and construction methods to construction projects throughout California. The CBC is published every three (3) years, and intervening Code Adoption Cycles produce Supplement pages every 18 months into each three-year period. All proposed amendments to California's building standards are subject to a lengthy and transparent public participation process throughout each code adoption cycle.

Chapter 16 of the CBC regards General Design Requirements, including regulations governing seismically resistant construction (Chapter 16, Division IV) and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapter 18 and Appendix Chapter 33 regard site demolition, excavations, foundations, retaining walls, and grading, including requirements for seismically resistant design, foundation investigations, stable cut and fill slopes, and drainage and erosion control. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system height, and seismic zoning. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in California Occupational Safety and Health Administration (Cal/OSHA) regulations (CCR, Title 8).

National Pollutant Discharge Elimination System. Site-specific Stormwater Pollution Prevention Plans (SWPPP) prepared for subsequent development projects facilitated through implementation of the CBUSP Amendment in compliance with a National Pollutant Discharge

Elimination System (NPDES) Phase I Permit would describe the Project area, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of post construction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are also required to inspect construction sites before and after storms to identify stormwater discharge from construction activity, and to identify and implement controls where necessary.

Local Regulations

Santa Ana Regional Water Quality Control Board. In 2010, the Santa Ana Regional Water Quality Control Board (RWQCB) issued municipal separate storm sewer system (MS4) permits (Permit R8-2010-0033 and NPDES No. CAS 618033) to the Riverside County Permittees. This incorporates programs developed since 1993. These are the fourth MS4 permits issues by each Regional Board and are referred to as the "Fourth-term" MS4 Permits. In this region, the City is a Permittee under the Fourth-term MS4 Permits. Under this Permit, the City is required to enforce and comply with storm water discharge requirements. The City has to maintain and control discharges to the MS4s and is responsible also for implementing regulations pertaining to management of groundwater investigation and cleanup.

City of Riverside General Plan Policies. The following objectives and policies pertaining to geology and soils are drawn from the City's *General Plan 2025* and are applicable to the proposed Project.

Safety Element Objectives and Policies

Objective PS-1	Minimize the potential damage to existing and new structures and loss of life that may result from geologic and seismic hazards.
Policy PS-1.1	Ensure that all new development in the City abides by the most recently adopted City and State seismic and geotechnical requirements.
Policy PS-1.2	Locate important public facilities of City importance outside of geologically hazardous areas.
Policy PS-1.6	Coordinate with the City Building Official to explore and implement, where feasible, best practices and latest technologies to minimize damage to structures located in areas determined to have a high liquefaction potential during seismic activities.
Objective PS-9	Minimize the effects from natural and urban disasters by providing adequate levels of emergency response services to all residents in Riverside.

Policy PS-9.8: Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding and structural and wildland fires by requiring feasible mitigation of such impacts on discretionary development projects.

City of Riverside Municipal Code. Title 6 of the City of Riverside Municipal Code (RMC) regulates water and other wells within the City. Chapter 6.28 of the RMC provides minimum standards for construction, reconstruction, abandonment and destruction of all wells in order to (a) protect underground water resources; and (b) provide safe water to persons within the City of Riverside.

Title 14, Section 14.08.030 – Connection to public sewer required, states all homes and any other structures must be properly connected to a public sewer whenever the property abuts upon a right-of-way in which there exists a public sewer to which connection may be made. Additionally if a house or structure is located within an area where the use of a septic tank poses a potential contamination risk to the City's drinking water wells in the area, as specified by resolution of City Council, all new houses or structures located within such area must be properly connected to the public sewer system. (Ord.6623 1, 2002; Ord. 6172 1, 1994: prior code 27.28).

Title 17, Section 17.16.010 – Indicates all applicants for a grading permit shall be accompanied by the following items, which shall be determined by the Public Works Director and the Community and Economic Development Director:

A. All grading plans, including interim erosion control plans.

B. Preliminary soils report as prepared by a registered soils engineer (geotechnical engineer), unless waived by the Public Works Director. The recommendations specified in the report shall be incorporated into the design of the grading plan. All soils engineers (geotechnical engineers) performing work within the City shall have a current City Business Tax Certificate.

C. Payment of a grading plan review fee as specified in the current Fees and Charges Resolution.

D. Form FG 2023 as filed with the California Fish and Wildlife, if the proposed grading involves alteration of or discharge into a blue line stream as identified on the topographic Quad Maps prepared by the U.S. Geological Services.

E. For Construction activity that includes the disturbance of at least one (1) acre, the following is also required by the National Pollutant Discharge Elimination System

(NPDES) General Permit for Storm Water Discharges associated with construction activity.

a. Submittal of a Notice of Intent (NOI) to the State Water Board.

b. Implementation of a Storm Water Pollution Prevention Plan (SWPPP) concurrent with the commencement of grading/clearing activities.

F. Documentation of New Development Best Management Practices (BMPs) required by the Riverside County Drainage area Management Plan to identify and control post construction/discharge of pollutants to the Waters of the United States. Copies available at the Public Works Department. (Ord. 7362 § 9, 2017; Ord 6673 § 5, 2003; Ord. 6453 § 1, 1998).

4.6.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on geology and soils if it would:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - (Threshold A) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Maps issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42.
  - (Threshold B) Strong seismic ground shaking.
  - (Threshold C) Seismic-related ground failure, including liquefaction.
  - (Threshold D) Landslides.
- (Threshold E) Result in substantial soil erosion or the loss of topsoil;
- (Threshold F) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse;
- (Threshold G) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994 or most current edition), creating substantial risks to life or property; and/or

- (Threshold H) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater.

Methodology

The analysis of potential geologic and soil-related impacts is based upon the proposed CBUSP Amendment, the Safety Element of the City's *General Plan 2025*, programmatic analysis of the City's *General Plan 2025 and Supporting Documents EIR*, literature prepared by the California Department of Mines and Geology, information from the federal Natural Resources Conservation Service (NRCS), mapping published by the United States Geological Survey (USGS), and other documents such as the City's Building Code, and the City's Design Guidelines and Sign Guidelines, which were reviewed and summarized to establish existing conditions. In determining the level of significance, the analysis assumes that construction and operation of the proposed Project would comply with relevant federal and State laws and regulations, as well as the City's *General Plan 2025* policies and RMC.

4.6.4 Project Design Features

State law requires the design and construction of new structures comply with current California Building Code requirements which address general geologic, seismic (including ground shaking), and soil constraints for new buildings. Prior to grading and building permit issuance, the City shall verify that the following note is included on grading and building plans, and project contractors shall be required to ensure compliance with the note. This note also shall be specified in bid documents issued to prospective construction contractors:

> *Construction activities shall occur in accordance with all applicable requirements of the California Code of Regulations (CCR), Title 24 (also known as the California Building Standards Code or the California Building Code) in effect at the time of construction.*

Prior to the issuance of grading permits, the project proponent will be required to prepare and submit detailed grading plans as each specific development is proposed. These plans will be prepared in conformance with applicable standards of the City of Riverside. Construction of off-site utility and roadway improvements will also result in the movement of soil, and would be subject to the same permitting and plan checking processes.

Landscape design guidelines apply to all new construction within the proposed CBU Specific Plan Zone, including hardscape materials, plant materials, and planting character arranged in various scales and intensities. New and rehabilitated landscaping shall comply with RMC Chapter 19.570 (Water Efficient Landscaping and Irrigation). Per the City's *General Plan 2025* Policy OS-10.9, all new development is required to landscape a percentage of the site to filter

pollutant loads in stormwater runoff and provide groundwater percolation zones. All landscaping near Magnolia Avenue, Adam Street, and Monroe Street will be designed to reinforce visual and thematic connections to the landscaping along these streets. Landscaping will not only enhance the beautification of the CBU campus, it will also help reduce erosion potential. Additionally, if project specific geotechnical reports are prepared and include recommendations to reduce soil erosion, those recommendations would need to be incorporated into the project design feature.

4.6.5 Environmental Impacts Before Mitigation

Threshold A: Would the project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zone Maps issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Surface rupture occurs where displacement or fissuring occurs as a result of movement along or immediately adjacent to a fault zone. The proposed Project site is not located within an Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zone Act or as defined by the City's *General Plan 2025*. In addition, there is no evidence of any faults or faulting activity on the Project site. The closest active or potentially active fault from the Project site is a northwest-southeast trending unnamed fault located approximately six (6) miles east of the Project site along the State Route 60/Interstate 215 freeway junction. Other known active faults as described in Section 4.6.1 are further away from the Project site. Thus, the potential for damage due to fault rupture is considered remote. Nonetheless, all subsequent projects administered under the CBUSP Amendment will be required to comply with the building design standards of the CBC in effect at the time of submittal of a development application for construction regarding seismicity, and all grading plans will be subject to City Staff review for regulatory compliance. For these reasons, **less than significant** impacts are expected to occur in relation to fault ruptures. No mitigation is required.

Threshold B: Would the project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

Southern California is a seismically active area and therefore, will continue to be subject to ground shaking resulting of seismic activity on regional faults. While no known active faults traverse the City, ground shaking from earthquakes associated with nearby and more distant faults is expected to occur during the lifetime of the Project. According to the City's *General Plan 2025 and Supporting Documents EIR*, the City is surrounded by several significant faults, including the Elsinore Fault 9.5 miles southwest of the Project site, the San Jacinto Fault 12.5 miles northeast of the Project site, and the San Andreas Fault 20 miles northeast of the Project

site, in addition to the unnamed fault along the State Route 60/Interstate 215 freeway junction located approximately six (6) miles east of the Project site.[7]

Due to the proximity of significant faults with the potential to generate moderate to large earthquakes, the City, and therefore the Project site, has the potential to experience ground acceleration greater than 35 to 43 percent.[8] However, these probabilistic ground motion values are within current limits established by the CBC and UBC. Pursuant to State law, all future design and construction administered under the CBUSP Amendment will be designed to resist seismic impacts in accordance with CBC requirements in effect at the time of submittal of a development application and Title 16, Buildings and Construction, of the RMC. Prior to issuance of any entitlements, the City will review and approve plans to confirm that the siting, design and construction of all structures and facilities are in accordance with the regulations established in the CBC, City Building Code, and/or professional engineering standards appropriate for the seismic zone in which such construction may occur. Additionally, all grading plans will be subject to City Staff review for regulatory compliance. Moreover, there is nothing unique about the Project site that would require additional measures beyond compliance with the adopted Building Code. Therefore, **less than significant** impacts are expected to occur due to ground shaking. No mitigation is required.

Threshold C: Would the project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

Implementation of the proposed Project will result in the future construction of approximately 400,000 square feet of academic, recreational, and student housing facilities and 805,000 square feet of parking structure(s) with integrated office space. The Project site is located within Seismic Zone 4 as defined by the CBC, which has 0.40 ground acceleration, having the highest seismic activity. The Project site lies on relatively flat terrain with no steep slopes, and no landslides or areas of mass movement exist on-site.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesion-less, loose sediments where the groundwater is typically less than 50 feet below the surface. According to the City's *General Plan 2025 Final Program EIR*, the Project site is located in an area identified as having a liquefaction potential ranging from low to high.[9] As a result, much of the soil profile below ground level is susceptible to liquefaction during strong

[7] *Section 5.6-Geology and Soils.* City of Riverside General Plan and Supporting Documents Environmental Impact Report. Figure 5.6-2. City of Riverside. November 2007.
[8] *Ibid.* Page 5.6-5.
[9] *Ibid*. Figure 5.6-3.

ground shaking. While the potential for surface manifestations like bearing failures and sand boils is considered low, the Project site is susceptible to differential settlement from liquefaction. This impact is potentially significant, and mitigation is required. The CBUSP Amendment shall be required to implement Mitigation Measure (**MM) GEO-1** for all future development projects proposed under the CBUSP Amendment.

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

Threshold D: Would the project expose persons or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

The Geology and Soils section of the City's *General Plan 2025 Final Program EIR* states that "areas of high susceptibility to seismically induced landslides and rockfalls correspond to steep slopes in excess of 30 percent."[10] Figure 5.6-1 of the City's *General Plan 2025 Final Program EIR* indicates that the Project area is located on land identified as having a 0-10% slope, which is the lowest of the four potential steep slope categories.[11] Additionally, the Project site has been previously excavated, filled, graded, and leveled with the development of the CBU campus. Surrounding areas are also primarily developed and not located on a hillside. Additionally, pursuant to CAL-OSHA excavation standards, temporary slopes for construction will be managed according to applicable safety and building regulations, as detailed in Section 4.6.4 of this Draft EIR. Therefore, impacts related to landslides are considered to be **less than significant.** No mitigation is required.

[10] *Section 5.6 – Geology and Soils.* City of Riverside General Plan and Supporting Document EIR. Page 5.6-6. Albert A. Webb Associates. November 2007.

[11] *Ibid.* Figure 5.6-.1

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

Figure 5.6-1 of the City's *General Plan 2025 Final Program EIR* indicates that the Project area is located on land identified as having a 0-10% slope, the lowest category of slope identified on that figure.[12] The Project site has been previously graded, and are fully developed, urbanized, and completely surrounded by urban development. Therefore, adoption of the proposed CBUSP Amendment would not result in substantial soil erosion or loss of topsoil, but construction activities associated with future development facilitated by the proposed CBUSP Amendment would have the potential to cause soil erosion or loss of topsoil.

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

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

If future development and improvements administered under the CBUSP Amendment are classified as "Priority Development Projects" pursuant to the *Water Quality Management Plan for the Santa Ana Region of Riverside County*,[13] they would be required to develop project- and site-specific Water Quality Management Plans (WQMP) to help reduce potential impacts to soil erosion post construction. In addition, all future project administered under the CBUSP

[12] *Section 5.6 – Geology and Soils*. City of Riverside General Plan and Supporting Document EIR. Figure 5.6-1, Areas Underlain by Steep Slope. Albert A. Webb Associates. November 2007.

[13] *Water Quality Management Plan, A Guidance Document for the Santa Ana Region of Riverside County.* http://www.waterboards.ca.gov/santaana/water_issues/programs/stormwater/docs/rcpermit/wqmp/WQMP_2012_06-28.pdf. (Accessed February 28, 2018).

Amendment that entail ground disturbance must comply with Title 17, Grading, of the RMC, which requires the implementation of measures designed to minimize soil erosion.

The soils underlying the Project site have a very low to moderate susceptibility to erosion by water, according to soil survey data from the NRCS.[14] However, with preparation and adherence to the requirements of project- and site-specific SWPPP, BMPs, NPDES, and WQMP as applicable, and compliance with Title 17, Grading, of the RMC, construction and operational impacts associated with soil erosion hazards are considered to be **less than significant**. No mitigation is required.

Threshold F: Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

The closest active or potentially active fault is an unnamed fault located approximately six (6) miles east of the Project site along the State Route 60/Interstate 215 freeway junction. The proposed Project site is not located within an Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zone Act or as defined by the City's *General Plan 2025*. In addition, there is no evidence of any faults or faulting activity on the Project site. According to the City's *General Plan 2025 and Supporting Documents EIR*, the City is surrounded by several significant faults, including the Elsinore Fault 9.5 miles southwest of the Project, the San Jacinto Fault 12.5 miles northeast of the Project site, San Andreas Fault 20 miles northeast of the Project site, in addition to the unnamed fault along the State Route 60/Interstate 215 freeway junction located approximately six (6) miles east of the Project site.[15] Due to the proximity of significant faults with the potential to generate moderate to large earthquakes, the City, and therefore the Project site, has the potential to experience ground acceleration greater than 35 to 43 percent.[16] However, these probabilistic ground motion values are within current limits established by the CBC and UBC.

Implementation of the proposed CBUSP Amendment will result in the construction of approximately 400,000 square feet of academic, recreational, and student housing facilities and 805,000 square feet of parking structure(s) with integrated office space. The Project site is located within Seismic Zone 4 as defined by the CBC, which has 0.40 ground acceleration, having the highest seismic activity. The Project site has been previously excavated, filled, graded, and leveled with the development of the CBU campus. Surrounding areas are also

[14] *Web Soil Survey*. U.S. Department of Agriculture, Natural Resources Conservation Service. 2013. http://websoilsurvey.nrcs.usda.gov/app/. (Accessed February 28, 2018).

[15] *Section 5.6-Geology and Soils.* City of Riverside General Plan and Supporting Documents Environmental Impact Report. Figure 5.6-2. City of Riverside. November 2007.

[16] *Ibid*. Page 5.6-5.

primarily developed and not located on a hillside. Additionally, pursuant to CAL-OSHA excavation standards, temporary slopes for construction will be managed according to applicable safety and building regulations, as detailed in Section 4.6.4 of this Draft EIR.

The potential for liquefaction generally occurs during strong ground shaking within relatively cohesion-less, loose sediments where the groundwater is typically less than 50 feet below the surface. According to the City's *General Plan 2025 EIR*, the Project site is located in an area identified as having a liquefaction potential ranging from low to high.[17] As a result, much of the soil profile below ground level is susceptible to liquefaction during strong ground shaking. While the potential for surface manifestations like bearing failures and sand boils is considered low, the Project site is susceptible to differential settlement from liquefaction. This impact is potentially significant, and mitigation is required.

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

Due to the placement of artificial fill on the Project site from prior development, there is little possibility that the upper soil layers will be saturated by groundwater. However, it is possible soil within localized areas could become saturated from long-term landscape irrigation, changes in site drainage, storm water basins, septic system use, or a pipe leak and result in localized soil collapse. Therefore, all future development and improvements administered under the CBUSP Amendment will be subject to project- and site-specific geotechnical studies conducted by a certified engineering geologist or other qualified professional; the findings and recommendations of which shall be implemented pursuant to **MM-GEO-1**.

CBU owns and operates two on-site wells equipped with 60-horsepower pumps with an approximate maximum capacity of 265 gallons per minute. Ground subsidence may occur as a response to on-site groundwater extraction from below the ground surface, or natural forces such as earthquake movements, which can cause abrupt elevation changes or densification of low density granular soils during an earthquake event that may cause several inches of settlement. The degree to which the Project site would be susceptible to subsidence and seismic settlement is dependent on the type of soil underlying the specific development area within the Project site. As there are five (5) soil types underlying the Project site, the heterogeneous nature of these soils requires evaluation and management of subsidence risk on a site-by site basis as future

[17] *Ibid*. Figure 5.6-3.

development and improvements are proposed under the CBUSP Amendment. Accordingly, all future development and improvements administered under the CBUSP Amendment will be subject to project- and site-specific geotechnical studies conducted by a certified engineering geologist or other qualified professional; the findings and recommendations of which shall be implemented pursuant to **MM-GEO-1**.

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

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

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

The various Hanford, Arlington, and Buchenau soils underlying the Project site are sandy loam with a low to moderate shrink-swell potential and therefore are considered to be non-critically expansive.[18] Specialized construction procedures designed to minimize expansive soil forces are not anticipated. However, additional evaluation of soils for expansion potential should be conducted by the geotechnical engineer prior to any entitlements process. Therefore, all future development and improvements administered under the CBUSP Amendment will be subject to project- and site-specific geotechnical studies conducted by a certified engineering geologist or other qualified professional; the findings and recommendations of which shall be implemented pursuant to **MM-GEO-1**. With implementation of mitigation measure **MM-GEO-1**, the City's

[18] *Web Soil Survey*. U.S. Department of Agriculture, Natural Resources Conservation Service. 2013. http://websoilsurvey.nrcs.usda.gov/app/. (Accessed February 28, 2018).

development review process, and existing laws and regulations regarding seismic and other geotechnical hazards, the proposed Project will have less than significant impacts relative to expansive soils. Impacts would be **less than significant with mitigation incorporated.**

Threshold H: Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

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

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

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

4.6.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measure is recommended to reduce impacts related to geology and soils to less than significant levels.

MM-GEO-1: Prior to any entitlement process for all future development projects administered under the CBUSP Amendment the applicant shall commission site-specific, design-level geotechnical investigations by a certified engineering geologist or other qualified professionals for all grading and construction projects subject to geologic hazards, including fault rupture, severe ground shaking, liquefaction, landslides, collapsible or expansive soils, subsidence, manufactured slope stability

(if applicable), and the engineering and construction of occupied or inhabited structures. The findings and recommendations contained in these reports shall be implemented prior to issuance of grading, building, and/or occupancy permits as applicable. As necessary, the City may require additional studies and/or engineering protocols to meet its requirements. This measure shall be implemented to the satisfaction of Public Works and the Community & Economic Development Department, Building and Safety Division, or designee.

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

4.6.7 Environmental Impacts After Mitigation Is Incorporated

Standard development procedures outlined in Section 4.6.4 of this Draft EIR in addition to incorporation of Mitigation Measure **MM-GEO-1** described in Section 4.6.6 of this Draft EIR and adherence to standard procedures, including compliance with CBC requirements in effect at the time of submittal of project-specific entitlement and building permit development applications, the City's development review process, and existing laws and regulations regarding seismic and other geotechnical hazards for all future development proposed under the CBUSP Amendment would reduce impacts from geology and soils to less than significant levels.

4.6.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Public Resources Code, Sections 2621–2630.

California, State of. *Water Quality Management Plan, A Guidance Document for the Santa Ana Region of Riverside County.* http://www.waterboards.ca.gov/santaana/water_issues/programs/stormwater/docs/rcpermit/wqmp/WQMP_2012_06-28.pdf. (Accessed February 28, 2018).

City of Riverside. *California Baptist University Specific Plan, Pre-Publication Draft.* November 6, 2017.

City of Riverside. *City of Riverside General Plan 2025*. November 2007.

City of Riverside. *City of Riverside General Plan 2025 and Supporting Documents Final Program Environmental Impact Report*. December 2007.

United States Department of Agriculture. *Natural Resources Conservation Service, Web Soil Survey*. http://websoilsurvey.nrcs.usda.gov/. (Accessed February 28, 2018).

United States Geological Survey. *Geologic Map of Riverside West, California 7.5' Quadrangle.* Riverside County, California.

4.7 GREENHOUSE GASES

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential impacts to the environment from the generation of Greenhouse Gas (GHG) Emissions. One comment addressing GHG emissions was received from the South Coast Air Quality Management District (SCAQMD) during the NOP public comment period. The analysis contained in this section is based upon the following report:

- *Air Quality and Greenhouse Gas Impact Analysis, California Baptist University Specific Plan Update,* LSA. December 2017 (EIR Appendix B).

4.7.1 Setting

Global Climate Change and its Sources

Global climate change (GCC) is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other significant changes in climate (e.g., precipitation or wind) that last for an extended period of time. The term "global climate change" is often used interchangeably with the term "global warming," but "global climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures.

Climate change refers to any change in measures of weather (e.g., temperature, precipitation, or wind) lasting for an extended period (decades or longer). Climate change may result from natural factors (e.g., changes in the sun's intensity), natural processes within the climate system (e.g., changes in ocean circulation), or human activities (e.g., the burning of fossil fuels, land clearing, or agriculture). The primary observed effect of GCC has been a rise in the average global tropospheric[1] temperature of 0.36°F per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling shows that further warming may occur, which may induce additional changes in the global climate system during the current century. Changes to the global climate system, ecosystems, and the environment of the State could include higher sea levels, drier or wetter weather, changes in ocean salinity, changes in wind patterns, or more energetic aspects of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and increased intensity of tropical cyclones. Specific effects in the State might include a decline in the Sierra Nevada snowpack, erosion of the State's coastline, and seawater intrusion in the San Joaquin Delta.

[1] The troposphere is the zone of the atmosphere characterized by water vapor, weather, winds, and decreasing temperature with increasing altitude.

Global surface temperatures have risen by 1.33°F ±0.32°F over the last 100 years. The rate of warming over the last 50 years is almost double that over the last 100 years (Intergovernmental Panel on Climate Change [IPCC] 2013). The latest projections, based on state-of-the-art climate models, indicate that temperatures in the State are expected to rise 3–10.5°F by the end of the century (State of California 2013). The prevailing scientific opinion on climate change is that "most of the warming observed over the last 60 years is attributable to human activities" (IPCC 2013). Increased amounts of carbon dioxide (CO_2) and other greenhouse gases (GHGs) are the primary causes of the human-induced component of warming. The observed warming effect associated with the presence of GHGs in the atmosphere (from either natural or human sources) is often referred to as "the greenhouse effect."[2]

GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced GCC are:[3]

- CO_2
- Methane (CH_4)
- Nitrous oxide (N_2O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF_6)

Over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmosphere. These extra emissions are increasing GHG concentrations in the atmosphere and enhancing the natural greenhouse effect, which some scientists believe can cause causing global warming. While GHGs produced by human activities include naturally occurring GHGs (e.g., CO_2, CH_4, and N_2O), some gases (e.g., HFCs, PFCs, and SF_6) are completely new to the atmosphere. Certain other gases (e.g., water vapor) are short-lived in the atmosphere compared to these GHGs, which remain in the atmosphere for significant periods of time and contribute to climate change in the long term. Water vapor is generally excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes (e.g., oceanic evaporation). For the purposes of this air quality

[2] The temperature on Earth is regulated by a system commonly known as the "greenhouse effect." Just as the glass in a greenhouse lets heat from sunlight in and reduces the amount of heat that escapes, GHGs like CO_2, CH_4, and N_2O in the atmosphere keep the Earth at a relatively even temperature. Without the greenhouse effect, the Earth would be a frozen globe; thus, the *naturally occurring* greenhouse effect is necessary to keep our planet at a comfortable temperature.

[3] The GHGs listed are consistent with the definition in Assembly Bill 32 (Government Code 38505), as discussed later in this section.

study, the term "GHGs" will refer collectively to the six gases identified in the bulleted list provided above.

These gases vary considerably in terms of global warming potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas in absorbing infrared radiation and the length of time that the gas remains in the atmosphere ("atmospheric lifetime"). The GWP of each gas is measured relative to CO_2, the most abundant GHG. The definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO_2 over a specified time period. GHG emissions are typically measured in terms of metric tons[4] of "CO_2 equivalents" (MT CO_2e). For example, N_2O is 265 times more potent at contributing to global warming than CO_2. Table 4.7.A identifies the GWP for each GHG analyzed in this analysis.

Table 4.7.A
Global Warming Potential for Selected Greenhouse Gases

Pollutant	Lifetime (Years)	Global Warming Potential (100-year)[1]
Carbon Dioxide (CO_2)	~100[2]	1
Methane (CH_4)	12	28
Nitrous Oxide (N_2O)	121	265
Hydrofluorocarbons (HFC)	<1 to >100	~100 to 12,000
Perfluorocarbons (PFC)	3,000 to 50,000	7,000 to 11,000
Sulfur hexafluoride (SF_6)	3,200	23,500

Source: California Air Resources Board. *First Update to the Climate Change Scoping Plan: Building on the Framework.* May 2014. Adapted from Table 1. https://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf (Accessed December 2017).

[1] The 100-year global warming potential estimates are from Section 8.7.1.2 of The Global Warming Potential Concept in the IPCC 2013 Fifth Assessment Report (AR5). Website: http://www.ipcc.ch/report/ar5/wg1/ (Accessed December 2017).

[2] CO_2 has a variable atmospheric lifetime and cannot be readily approximated as a single number.

ARB = California Air Resources Board
CO_2 = carbon dioxide
IPCC = Intergovernmental Panel on Climate Change

The following discussion summarizes the characteristics of the six primary GHGs.

Carbon Dioxide. In the atmosphere, carbon generally exists in its oxidized form, as CO_2. Natural sources of CO_2 include the respiration (breathing) of humans, animals, and plants; volcanic outgassing; decomposition of organic matter; and evaporation from the oceans. Human-caused sources of CO_2 include the combustion of fossil fuels and wood, waste incineration, mineral

[4] A metric ton is equivalent to approximately 1.1 tons.

production, and deforestation. The Earth maintains a natural carbon balance, and when concentrations of CO_2 are upset, the system gradually returns to its natural state through natural processes. Natural changes to the carbon cycle work slowly, especially compared to the rapid rate at which humans are adding CO_2 to the atmosphere. Natural removal processes (e.g., photosynthesis by land- and ocean-dwelling plant species) cannot keep pace with this extra input of human-made CO_2, and consequently the gas is building up in the atmosphere. The concentration of CO_2 in the atmosphere has risen from about 280 parts per million (ppm) prior to the Industrial Revolution to more than 400 ppm currently.[5]

The transportation sector remained the largest source of GHG emissions in 2014, representing 36 percent of the State's GHG emission inventory.[6] The largest emissions category within the transportation sector is on-road, which consists of passenger vehicles (cars, motorcycles, and light-duty trucks) and heavy-duty trucks and buses. Emissions from on-road sources constitute more than 92 percent of the transportation sector total. Industry and electricity generation were the State's second- and third-largest categories of GHG emissions, respectively.

Methane. CH_4 is produced when organic matter decomposes in environments lacking sufficient oxygen. Natural sources of CH_4 include fires, geologic processes, and bacteria that produce CH_4 in a variety of settings (most notably, wetlands) (EPA 2010). Anthropogenic sources include rice cultivation, livestock, landfills and waste treatment, biomass burning, and fossil fuel combustion (e.g., the burning of coal, oil, and natural gas). As with CO_2, the major removal process of atmospheric CH_4—a chemical breakdown in the atmosphere—cannot keep pace with source emissions, and CH_4 concentrations in the atmosphere are increasing.

Nitrous Oxide. N_2O is produced naturally by a wide variety of biological sources, particularly microbial action in soils and water. Tropical soils and oceans account for the majority of natural source emissions. N_2O is also a product of the reaction that occurs between nitrogen and oxygen during fuel combustion. Both mobile and stationary combustion sources emit N_2O. The quantity of N_2O emitted varies according to the type of fuel, technology, and pollution control device used, as well as maintenance and operating practices. Agricultural soil management and fossil fuel combustion are the primary sources of human-generated N_2O emissions in the State.

Hydrofluorocarbons, Perfluorocarbons, and Sulfur Hexafluoride. HFCs are primarily used as substitutes for O_3-depleting substances regulated under the Montreal Protocol.[7] PFCs and SF_6 are

[5] *GHG data from UNFCCC*. United Nations Framework Convention on Climate Change (UNFCCC). 2017. http://unfccc.int/ghg_data/items/3800.php (Accessed October 26, 2017).

[6] *Ibid.*

[7] The Montreal Protocol is an international treaty that was approved on January 1, 1989 and was designated to protect the O_3 layer by phasing out the production of several groups of halogenated hydrocarbons that are believed to be responsible for O_3 depletion and are also potent GHGs.

emitted from various industrial processes, including aluminum smelting, semiconductor manufacturing, electric power transmission and distribution, and magnesium casting. There is no aluminum or magnesium production in the State; however, the rapid growth in the semiconductor industry, which is active in the State, has led to greater use of PFCs. Since there are no known project-related emissions of HFCs, PFCs, or SF_6, these substances are not discussed further in this analysis.

Emissions Sources and Inventories. An emissions inventory that identifies and quantifies the primary human-generated sources and sinks of GHGs is a well-recognized and useful tool for addressing climate change. This section summarizes the latest information on global, national, State, and local GHG emission inventories. However, because GHGs persist for a long time in the atmosphere (Table 4.7.A), accumulate over time, and are generally well mixed, their impact on the atmosphere and climate cannot be tied to a specific point of emission.

Global Emissions

Worldwide emissions of GHGs in 2015 totaled approximately 45 billion metric tons of carbon dioxide equivalent per year (MT CO_2e/yr).[8] Global estimates are based on country inventories developed as part of the programs of the United Nations Framework Convention on Climate Change (UNFCCC).

United States Emissions

In 2015, the United States emitted approximately 6.59 billion MT CO_2e, down from 6.9 billion MT CO_2e in 2014, and down from 7.3 billion MT CO_2e in 2007. Although United States emissions have increased overall by 3.5 percent from 1990 to 2014, they have decreased by 2.3 percent from 2014 to 2015. Recent trends can be attributed to decreases in CO_2 emissions from fossil fuel combustion resulting from substitution from coal to natural gas in the electric power sector, warmer winter conditions resulting in decreased demand for heating fuel in residential and commercial sectors, and a slight decrease in electricity demand.[9]

State of California Emissions

According to the California Air Resources Board (ARB) emission inventory estimates, the State emitted approximately 440.4 million metric tons of CO_2e (MMT CO_2e) emissions in 2015. This

[8] *GHG data from UNFCCC*. United Nations Framework Convention on Climate Change (UNFCCC). 2017. http://unfccc.int/ghg_data/items/3800.php (Accessed October 26, 2017).

[9] *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2015*. United States Environmental Protection Agency (EPA). 2017. https://www.epa.gov/sites/production/files/2017-02/documents/2017_complete_report.pdf (Accessed October 26, 2017).

is a decrease of 1.1 MMT CO_2e from 2014, a decrease of 3.9 MMT CO_2e from 2013, and approximately 10 percent decrease since peak levels in 2004.[10]

ARB estimates that transportation was the source of approximately 36 percent of the State's GHG emissions in 2014, followed by electricity generation (both in-State and out-of-State) at 20 percent, and industrial sources at 21 percent. The remaining sources of GHG emissions were residential and commercial activities at 9 percent, agriculture at 8 percent, high-GWP gases at 4 percent, and recycling and waste at 2 percent.[11]

ARB staff has projected Statewide unregulated GHG emissions for 2020, which represent the emissions that would be expected to occur in the absence of any GHG reduction actions, at 509 MMT CO_2e. GHG emissions from the transportation and electricity sectors as a whole are expected to increase but remain at approximately 30 percent and 32 percent of total CO_2e emissions, respectively (ARB 2014).

City of Riverside GHG Emissions Inventory

The City has developed inventories for the calendar years 2007 and 2010. The City's Community Greenhouse Gas Emissions Inventories account for GHG emissions by sector from the community and from municipal operations within the City's geographic boundary (Community). The 2007 and 2010 inventories utilized International Council for Local Environmental Initiatives (ICLEI)'s Clean Air and Climate Protection Software and emission accounting protocols for assessing emissions from the following sectors: residential energy use, commercial/industrial energy use, transportation, and solid waste generation.[12]

Table 4.7.B compares the 2007 and 2010 emissions inventories. Communitywide emissions decreased by approximately 13%, with only transportation emissions increasing by approximately 4%. The large drop in Residential and Commercial/Industrial emissions between 2007 and 2010 was due to a reduction in the carbon intensity of the City's electricity portfolio, as supplied by municipally-owned Riverside Public Utilities (RPU). The result was a 23% reduction in Residential emissions and a 30% reduction in Commercial/Industrial emissions.[13]

[10] *California Greenhouse Gas Emission Inventory-2017 Edition.* California Air Resources Board (ARB). Released June 6, 2017. https://www.arb.ca.gov/cc/inventory/data/data.htm (accessed October 26, 2017).
[11] *Ibid.*
[12] *Economic Prosperity Action Plan and Climate Action Plan*. City of Riverside. Page B.2-1, January 2016.
[13] *Ibid.* Page B.2-4.

Table 4.7.B
Community GHG Emissions Inventories

Sector	2007	2010
	MT CO_2e	*MT CO_2e*
Residential	626,136	481,903
Commercial/Industrial	1,028,804	722,321
Transportation	1,301,784	1,358,647
Solid Waste	67,342	54,669
Total	**3,024,066**	**2,617,540**

Source: *Economic Prosperity Action Plan and Climate Action Plan*. Page B.2-10. City of Riverside. January 2016.

NOP Comments

The SCAQMD provided a written letter, dated May 11, 2016, to the City during the NOP comment period. In the letter, the SCAQMD outlines basic measures recommended by the California Air Pollution Control Officer's Association (CAPCOA) to reduce potential GHG impacts from the proposed project, and requests a copy of the Draft EIR and technical document(s) related to the GHG analysis upon completion.

4.7.2 Related Regulations

Regulation of GHGs in the United States and California is relatively new, beginning early in the 2000s. In the absence of major federal efforts, California's former governor, Arnold Schwarzenegger, and the legislature took initiatives to establish goals for reductions of GHG emissions in California and to prescribe a regulatory approach to ensuring that the goals would be met. The Federal Government, primarily through actions of the EPA, has also begun to regulate GHG emissions, although not as comprehensively. This section provides a brief foundation for these regulatory efforts and discusses the key federal and State regulatory efforts that could apply to development under the proposed project and the users of such development.

Federal Regulations

Clean Air Act. In 2007, through Massachusetts v. Environmental Protection Agency (Docket No. 05–1120), the U.S. Supreme Court held that the United States Environmental Protection Agency (USEPA) has authority to regulate GHGs. As such, the U.S. Supreme Court ruled that the USEPA should be required to regulate carbon dioxide and other GHGs as pollutants under Section 202(a)(1) of the federal Clean Air Act (CAA).

State Regulations

California Air Resources Board Standards and Programs. Although not originally intended to reduce GHG emissions, California's Energy Efficiency Standards for Residential and Nonresidential Buildings (24 CCR 6) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy-efficiency technologies and methods. The premise for the standards is that energy-efficient buildings require less electricity, natural gas, and other fuels. Electricity production from fossil fuels and on-site fuel combustion (typically for space and water heating) results in GHG emissions. Therefore, increased energy efficiency in buildings results in relatively lower rates of GHG emissions on a building-by-building basis.

Executive Order S-3-05. On June 1, 2005, California Governor Arnold Schwarzenegger announced through Executive Order S-3-05, the following GHG emissions targets:

- By 2010, California shall reduce GHG emissions to 2000 levels.
- By 2020, California shall reduce GHG emissions to 1990 levels.
- By 2050, California shall reduce GHG emissions to 80 percent below 1990 levels.

EO S-3-05 also laid out responsibilities among the state agencies for implementation and for reporting on progress toward the targets.

Assembly Bill 32 (AB 32), the California Global Warming Solutions Act of 2006. AB 32 codified the statewide GHG emissions reduction target of 1990 levels by 2020. As part of this legislation, ARB was required to prepare a "Scoping Plan" that demonstrates how the State will achieve this goal. The Scoping Plan was adopted in 2011 and in it, local governments were described as "essential partners" in meeting the statewide goal, recommending a GHG reduction level 15 percent below 2005—2008 levels, depending on when a full emissions inventory is available, by 2020.

ARB adopted the 2017 Scoping Plan Update in December 2017. The 2017 Scoping Plan Update provides strategies for achieving the 2030 target established by Executive Order B-30-15 and codified in SB 32 (40 percent below 1990 levels by 2030). The 2017 Scoping Plan Update recommends local plan level GHG emissions reduction goals. ARB recommends that local governments aim to achieve community-wide goal to achieve emissions of no more than six metric tons CO_2e per capita by 2030 and no more than two metric tons CO_2e per capita by 2050.

The Cap-and-Trade Program is a key element of California's climate plan. Cap-and-trade is a market based regulation that is designed to GHGs from multiple sources. Cap-and-trade sets a firm limit or cap on sources responsible for 85 percent of California's GHGs and minimizes the

compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies, by establishing a price signal needed to drive long-term investment in cleaner fuels and more efficient use of energy. The Program covers about 450 entities and started in 2013 for electricity generators and large industrial facilities (i.e., 25,000 MTCO2e or more annually). In 2014, the Program was linked with the Canadian province of Québec, and is designed to link with similar trading programs in other states and regions. In 2015 the Program started for distributors of transportation, natural gas, and other fuels.**SB 32.** On April 29, 2015, California Governor Jerry Brown announced through Executive Order B-30-15, the following GHG emissions target:

- By 2030, California shall reduce GHG emissions to 40 percent below 1990 levels.

SB 32 codified in 2016 an update to the Climate Change Scoping Plan first by ARB in 2008 as part of SB 32. The update codified a GHG emissions reduction target of 40 percent below 1990 levels by 2030 is an interim-year goal to make it possible to reach the ultimate goal of reducing emissions 80 percent under 1990 levels by 2050. SB 32 included companion legislation AB 197, which provides additional direction for developing the Scoping Plan. ARB is moving forward with a second update to the Scoping Plan to reflect the 2030 target set by Executive Order B-30-15 and codified by SB 32. .

Senate Bill 97 (SB 97). SB 97, enacted in 2007, amends the CEQA statute to clearly establish that GHG emissions and the effects of GHG emissions are appropriate subjects for CEQA analysis. The legislation directed the California Office of Planning and Research (OPR) to develop draft CEQA Guidelines "for the mitigation of GHG emissions or the effects of GHG emissions" and directed the Resources Agency to certify and adopt the State CEQA Guidelines. CEQA Guidelines Section 15183.5, Tiering and Streamlining the Analysis of GHG Emissions, was added as part of the CEQA Guideline amendments that became effective in 2010 and describes the criteria needed in a GHG reduction plan that would allow for the tiering and streamlining of CEQA analysis for development projects.

Assembly Bill 1493, Clean Car Standards. Known as "Pavley I," AB 1493 standards were the nation's first GHG standards for automobiles. AB 1493 requires ARB to adopt vehicle standards that will lower GHG emissions from new light-duty autos to the maximum extent feasible. Additional strengthening of the Pavley standards (referred to previously as "Pavley II," now referred to as the "Advanced Clean Cars" measure) has been proposed for vehicle model years 2017–2025. Together, the two standards are expected to increase average fuel economy to roughly 43 miles per gallon by 2020 (and more for years beyond 2020).

Assembly Bill 341 (Commercial Recycling). AB 341 sets a statewide goal of 75 percent recycling, composting, or source reduction of solid waste by the year 2020. As required by AB 341, CalRecycle adopted the Mandatory Commercial Recycling Regulation on January 17, 2012. The regulation was approved by the Office of Administrative Law on May 7, 2012 and became effective immediately and clarifies the responsibilities in implementing mandatory commercial recycling. The Mandatory Commercial Recycling Regulation focuses on increased commercial waste diversion as a method to reduce GHG emissions. The regulation is designed to achieve a reduction in GHG emissions of 5 million metric tons of carbon dioxide which equates to roughly an additional 2 to 3 million tons of currently disposed commercial solid waste being recycled by 2020 and thereafter.

Executive Order S-1-07, Low Carbon Fuel Standard (LCFS). Executive Order S-01-07 mandates (1) that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020, and (2) that an LCFS for transportation fuels be established in California. ARB developed the LCFS regulation pursuant to the authority under AB 32 and adopted it in 2009.

Executive Order S-13-08, The Climate Adaptation and Sea Level Rise Planning Directive. Executive Order S-13-08 provides clear direction for how the state should plan for future climate impacts. Executive Order S-13-08 calls for the implementation of four key actions to reduce the vulnerability of California to climate change:

- Initiate California's first statewide Climate Adaptation Strategy (CAS) that will assess the state's expected climate change impacts, identify where California is most vulnerable, and recommend climate adaptation policies.
- Request that the National Academy of Sciences establish an expert panel to report on sea level rise impacts in California in order to inform state planning and development efforts.
- Issue interim guidance to state agencies for how to plan for sea level rise in designated coastal and floodplain areas for new and existing projects.
- Initiate studies on critical infrastructure and land-use policies vulnerable to sea level rise.

California Code of Regulations (CCR) Title 24, Part 6. CCR Title 24, Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings) (Title 24), was established in 1978 to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels and natural gas use result in GHG emissions and energy efficient buildings require less electricity and natural gas. Therefore, increased energy efficiency results in decreased GHG emissions.

The California Energy Commission (CEC) adopted 2008 Standards on April 23, 2008, in response to AB 32. The Standards were adopted to provide California with an adequate, reasonably priced, and environmentally sound supply of energy; to pursue California energy policy, which states that energy efficiency is the resource of first choice for meeting California's energy needs; to meet the West Coast Governors' Global Warming Initiative commitment to include aggressive energy efficiency measures into updates of state building codes every three years; and to meet the Executive Order in the Green Building Initiative to improve the energy efficiency of nonresidential buildings through aggressive standards. The latest update of CCR Title 24, Part 6 went into effect July 1, 2014, which significantly increases the energy efficiency of new residential buildings.

Senate Bill 375, Sustainable Communities Strategy (SCS). SB 375 provides for a new planning process that coordinates land use planning, regional transportation plans, and funding priorities in order to help California meet the GHG reduction goals established in AB 32. SB 375 requires regional transportation plans, developed by metropolitan planning organizations (MPOs) to incorporate a sustainable communities strategy (SCS) in their regional transportation plans (RTPs). The goal of the SCS is to reduce regional vehicle miles traveled (VMT) through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined CEQA review for some infill projects such as transit-oriented development.

CALGreen Building Code. CCR Title 24, Part 11 (California's Green Building Standard Code) (CALGreen), was adopted in 2010 and went into effect January 1, 2011. CALGreen is the first statewide mandatory green building code and significantly raises the minimum environmental standards for construction of new buildings in California. The mandatory provisions in CALGreen will reduce the use of volatile organic compounds (VOC) emitting materials, strengthen water conservation, and require construction waste recycling.

SB x7-7. SB x7-7 requires water suppliers to reduce urban per capita water consumption 20 percent from a baseline level by 2020.

Renewable Portfolio Standard. The Renewable Portfolio Standard (RPS) requires energy providers to derive 33 percent of their electricity from qualified renewable sources by 2020. This is anticipated to lower emission factors (i.e., fewer GHG emissions per kilowatt-hour used) from utilities across the state, including Riverside Public Utilities (RPU).

Local Regulations

City of Riverside General Plan 2025. The Air Quality Element and the Open Space and Conservation Element of the City of Riverside General Plan 2025 include policies intended to reduce GHGs. Many of the policies described in Section 4.1 (Air Quality) and Section 4.12

(Energy Conservation) would also apply to GHGs. Additional policies that may be applicable to the Project include:

Policy AQ-5.1: Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills.

Policy AQ-5.3: Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources.

Policy AQ-5.6: Support the use of automated equipment for conditioned facilities to control heating and air conditioning.

Policy AQ-5.7: Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.

Policy AQ-8.17: Develop measures to encourage that a minimum of 40 percent of the waste from all construction sites throughout Riverside be recycled by the end of 2008.

City of Riverside Green Action Plan. In July 2005, the City of Riverside assembled a Clean and Green Task Force that developed guidelines for a cleaner, greener, and more sustainable city. Its sustainability policy statement highlighted the following categories: save water, keep it clean, make it solar, make it shady, clean the air, save fuel, make it smart, and build green. The task force created a 38-point Clean and Green Sustainable Riverside Action Plan (Green Action Plan) to transform the policy statement into an implementation plan.

The Green Action Plan is an evolving document that outlines ways to improve air quality, reduce traffic congestion, increase accessibility and use of parks, and otherwise preserve the environment.[14] The first Riverside Green Action Plan was approved by the City Council in December 2007. To ensure that the tasks of the Green Action Plan would be carried out successfully, the City formed a Green Accountability Performance Committee, and within just two years, nearly all of the plan's 38 tasks had been accomplished.

In February 2009, the California Department of Conservation introduced Riverside as California's First Emerald City, and in September 2009, the City introduced a Green Action Plan–Emerald City update. The latest Green Action Plan (2012) includes 19 goals and more than 50 tasks within the following eight areas: energy, GHG emissions, waste, urban design, urban nature, transportation, water, and healthy communities.

[14] *Green Action Plan*. City of Riverside. 2012. http://www.greenriverside.com/about-green-riverside/green-action-plan (Accessed October 26, 2017).

There are two goals under the Green Action Plan GHG emissions focus area: Goal 4 and Goal 5. One action under Goal 4 is to establish the 1990 GHG emissions baseline for the City by the end of 2010 and every five years after. Goal 5 aims to create a climate action plan to reduce GHG emissions to seven percent below the 1990 City baseline, utilizing the City boundaries as defined in 2008.

Riverside Restorative Growth Print - Economic Prosperity Action Plan (RRG-EPAP) and Climate Action Plan (RRG-CAP). The RRG-EPAP and the RRG-CAP were adopted by the City on January 5, 2016 under resolution No. 22942. In 2014, Riverside was one of twelve cities that collaborated with the Western Riverside Council of Governments (WRCOG) on a Sub regional Climate Action Plan (Sub regional CAP) that includes 36 measures to guide Riverside's GHG reduction efforts through 2020. The RRG-CAP expands upon the Sub regional climate action plan and provides a path for the City to achieve deep reductions in GHG emissions through 2035, while the RRG-EPAP provides a framework for smart growth and low-carbon economic development.

By using energy more efficiently, harnessing renewable energy to power buildings and vehicles, improving access to sustainable transportation modes, recycling more waste, conserving water, and building local food systems, the City can support the local economy, create new green jobs, and improve public health and community quality of life. The RRG-CAP contains GHG reduction measures organized into four primary sectors, as defined by the following policy goals:

- Energy
    - Energy Measures designed to increase community-wide building and equipment efficiency and renewable energy use, and promote energy efficiency and renewable energy generation for use supporting municipal operations that support the community.
- Transportation and Land Use
    - Transportation and land use measures that would reduce single-occupancy vehicle travel, increase non-motorized travel, improve public transit access, increase motor vehicle efficiency, encourage alternative fuel vehicles and promote sustainable growth patterns.
- Water
    - Water measures that would conserve potable water and reduce water demand by the community and municipal operations.
- Solid Waste

  - Solid waste measures that would reduce solid waste sent to landfills that is generated by the community and municipal operations.

The City's RRG-CAP includes State and Regional Measures by sector and the GHG reduction potential associated with these measures for the City. The RRG-CAP also identifies Local Reduction Measures by sector and the GHG reduction potential associated with each measure. The RRG-CAP meets the CEQA Guidelines Section 15083.5(b) requirements for a qualified greenhouse gas reduction plan as shown below:

- The CAP quantifies emissions for a 2007 base year and future inventories for 2020 and 2035.
- Following the state's adopted AB 32 GHG reduction target, the City has set a goal to reduce emissions back to 1990 levels by the year 2020. This target was calculated as a 15% decrease from 2010 levels, as recommended in the AB 32 Scoping Plan. The emission sectors that are the focus of State regulations are the same sectors found in the City's GHG inventory as shown in the analysis provided in the CAP as substantial evidence to support its conclusion that reductions achieved by 2020 were sufficient to demonstrate consistency with AB 32 targets and the ARB Scoping Plan.
- The CAP analyzed the GHG emissions resulting from specific sources under the jurisdiction of the City or within the City's ability to influence including source categories common to most climate action plans in California.
- The CAP identified specific measures that would reduce GHG emissions by the required amount from regulations that apply to existing and new development and local measures that apply to the sources of emissions including:
  - Energy – Including electricity and natural gas consumption.
  - Transportation and Land Use.
  - Water.
  - Solid Waste.
- The CAP includes an implementation and monitoring plan that includes biennial GHG inventory updates, CAP revisions every five years, and a monitoring tool that tracks implementation of the most impactful RRG CAP measures and annually estimates the GHG reductions associated with implementation.
- The CAP was included as part of the Riverside Restorative Growthprint (RRG) that combines two plans: the Economic Prosperity Action Plan (EPAP) and the Climate Action Plan and was adopted by Riverside City Council on January 5, 2016 with Resolution No. 22942 after a Mitigated Negative Declaration was completed and processed in compliance with the requirements of CEQA with response to public comments incorporated.

- The CAP includes binding and enforceable requirements that apply to development projects to ensure plan consistency. All emission reductions required to reach the plan 2020 targets are achieved through compliance with adopted regulations, ordinances, and code enforced by the State and the City. Conditions of approval may be applied for measures requiring project specific actions not specifically addressed by the regulation or code.

4.7.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, the project could have a significant impact related to greenhouse gas emissions if the proposed project would:

- (Threshold A) generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
- (Threshold B) conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

4.7.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through the design. As discussed below, the proposed CBUSP Amendment establishes objectives and policies and outlines sustainable design elements that guide development to reduce GHG emissions through buildout of the CBUSP.

CBUSP Amendment Objectives and Policies

Objective 6: Encourage environmentally sustainable development and operational practices.

Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside building code requirements.

Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals.

Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements.

Policy 6.4: Implement sustainability measures that complement and support the *City of Riverside Green Action Plan.*

CBUSP Amendment Design Guidelines

Chapter 7of the CBUSP Amendment provides specific design guidelines to guide the architectural, landscape, streetscape, open space, and lighting design to collectively reduce GHG emissions through and "integrated approach" that brings all of the appropriate project stakeholders together throughout the design and construction process to set and evaluate sustainable project strategies and performance goals. New development and major renovations will adhere to the guidelines in outlined below and be designed to incorporate sustainable design elements that minimize environmental impact, reduce demand on infrastructure, reduce long-term operations maintenance and utility expenses, and provide a healthier indoor environment for occupants.[15] These design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*.

Sustainable Design shall apply to all new construction within the CBU Specific Plan Zone, including modifications to existing structures. New construction and modifications to existing structures will consider site development, water conservation, energy efficiency, and materials and resources, solar energy, and environmental quality in an effort to go beyond the requirements of the California Green Building Standards Code (CALGreen), as practical.

Site Development[16] shall include landscape design and plantings to complement existing surrounding landscape materials. Shade trees in new landscape designs will be provided to reduce heat island impacts (when shading paved/developed surfaces) and to support the *City of Riverside Green Action Plan* goals. Additionally, design plans will incorporate high-efficiency/low-water consumption irrigation systems. New irrigation control systems shall incorporate weather or soil moisture based monitoring to adjust irrigation time and volume based on actual conditions. Finally, nonessential exterior lighting shall be turned off by automatic controllers from 11:00 P.M. to the following evening at dusk. Where feasible, essential lighting shall be equipped with occupancy-sensing controls to reduce power to provide lighting at minimum safety thresholds when areas are unoccupied. Lighting shall be ramped up to full power (based on zones) when motion is detected in the vicinity.

Water Conservation elements shall include interior plumbing fixtures to reduce water usage consistent with local and State directives and best practices. Where feasible, waste heat recovery systems will be incorporated to capture heat from drainage water to pre-heat domestic water

[15] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 7 Section A, Subsection B-C, E. Section G, Subsection H. Section K, Subsection 1-6. City of Riverside. August 2018.

[16] Only design elements pertaining to GHG reduction are presented.

supplies. Non-potable water systems (from on-site water wells) will be used for irrigation and other approved uses. Finally, gray water plumbing systems may be installed in new buildings, as acceptable to permitting health agencies.

Energy Efficiency elements shall include, at minimum, 2016 Title 24 Energy Code standards, as amended, for all new projects. All new development and retrofit projects shall include opportunities for energy efficiency incentive funding through the Riverside Public Utilities Programs and Services. The installation and use of on-site renewable energy systems shall be investigated to reduce demand on existing energy grid infrastructure and to support the *City of Riverside Green Action Plan* goals. New development projects will incorporate high-efficiency mechanical systems as warranted. CBU will investigate the potential for incorporation of highly efficient systems and passive or mixed mode (mechanical and natural ventilation) systems. CBU will reduce energy consumption through ongoing monitoring and re/retro commissioning of building systems to ensure optimal operation. Finally, all energy efficiency upgrades to historic buildings shall comply with RMC Title 20 (Cultural Resources) and Historic Preservation Building Standards.

Materials and Resources shall include a construction waste management plan for each construction project consistent with the City's waste stream diversion requirements. The University will provide at multiple locations on campus clearly marked and easily accessible areas for the collection and temporary storage of recyclable materials, including but not limited to paper, plastic, glass, cardboard, and metals. Collection areas for dormitories and other on-campus multiple-unit residences will be provided inside buildings on each level (at a minimum), and central collection enclosure areas will be provided adjacent to (or within) exterior trash collection enclosures.

Solar Energy elements shall include consideration of photovoltaic and solar water heating into new construction projects and in the renovation of academic and residential facilities to achieve *City of Riverside Green Action Plan* goals. Installations on roofs and inconspicuous areas can minimize the visual impact to the campus architecture while still providing energy offsets to essential areas within the campus.

Environmental Quality elements shall include new construction projects designed to maximize daylight access for interior occupied spaces. Top lighting and side lighting strategies shall be combined to optimize daylight access for building occupants. Daylighting strategies to be investigated for feasibility include, but are not limited to, exterior/interior light shelves, skylights and monitors, clerestory windows, tubular skylights, and light wells.

4.7.5 Environmental Impacts Before Mitigation

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

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

- Construction Activities: During construction of the project, GHGs would be emitted through the operation of construction equipment and from worker and vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs (e.g., CO_2, CH_4, and N_2O). Furthermore, CH_4 is emitted during the fueling of heavy equipment.
- Gas, Electricity, and Water Use: Natural gas use results in the emission of two GHGs: CH_4 (the major component of natural gas) and CO_2 (from the combustion of natural gas). Electricity use can result in GHG production if the electricity is generated by combusting fossil fuel. California's water conveyance system is energy-intensive. Preliminary estimates indicate that the total energy used to pump and treat this water exceeds 6.5 percent of the total electricity used in the State per year (State of California 2008).
- Solid Waste Disposal: Solid waste generated by the project could contribute to GHG emissions in a variety of ways. Landfilling and other methods of disposal use energy for transporting and managing the waste, and they produce additional GHGs to varying degrees. Landfilling, the most common waste management practice, results in the release of CH_4 from the anaerobic decomposition of organic materials. CH_4 is 25 times more potent a GHG than CO_2. However, landfill CH_4 can also be a source of energy. In addition, many materials in landfills do not decompose fully, and the carbon that remains is sequestered in the landfill and not released into the atmosphere.
- Motor Vehicle Use: Transportation associated with the proposed CBUSP would result in GHG emissions from the combustion of fossil fuels in daily automobile and truck trips.

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

- 49.57 acres of total land disturbance; and

- 4 acres maximum acres disturbed per day.

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

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

Table 4.4.C lists the annual CO_2e emissions for each of the planned construction phases based on the results from CalEEMod.

Architectural coatings used in project construction may contain VOCs that are similar to ROGs and are part of O_3 precursors. However, there are no significant emissions of GHGs from architectural coatings. The architectural coating phase in Table 4.4.C shows GHG emissions from equipment exhaust and energy use.

Table 4.4.C
Construction Greenhouse Gas Emissions

Construction Phase		Total Regional Pollutant Emissions (MT/yr)			
		CO_2	**CH_4**	**N_2O**	**CO_2e**
2019	Demolition	107	<1	0	107
	Site Preparation	54	<1	0	54
	Grading	216	<1	0	218
	Building Construction	2,440	<1	0	2,443
2020	Building Construction	5,889	<1	0	5,896
2021	Building Construction	5,725	<1	0	5,733
2022	Building Construction	2,371	<1	0	2,374
	Paving	59	<1	0	59
	Architectural Coating	156	<1	0	156
Total Construction Emissions		**17,017**	**<1**	**0**	**17,041**
Amortized over 30 years		**567**	**<1**	**0**	**568**

Source: Air Quality and Greenhouse Gas Impact Analysis, LSA, December 2017.
Note: While the CH_4 and N_2O emissions are shown as zero, some are actually just less than 1. However, they do contribute to the CO_2e total.

CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide

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

As discussed in Section 15183.5(b), a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program under specified circumstances. The City has adopted a Climate Action Plan that qualifies as a plan for the reduction of greenhouse gas emissions pursuant to the CEQA Guidelines. The Project's consistency with the City's Climate Action Plan is discussed under Threshold B. Nonetheless, the Project's GHG emissions are forecast in this section for informational purposes.

The GHG emission estimates presented in Table 4.4.D shows the emissions associated with the level of development envisioned by the proposed Project at opening. Area sources include architectural coatings, consumer products, hearth, and landscaping. Energy sources include natural gas consumption for heating and cooking.

Table 4.4.D
Operational Greenhouse Gas Emissions

Source	Pollutant Emissions, MT/year					
	Bio- CO_2	**NBio- CO_2**	**Total CO_2**	**CH_4**	**N_2O**	**CO_2e**
Construction emissions amortized over 30 years	0	567	567	<1	0	568
Operational Emissions						
Area Sources	0	67	67	<1	0	68
Energy Sources	0	15,691	15,691	<1	<1	15,734
Mobile Sources	0	4,708	4,708	<1	0	4,717
Waste Sources	517	0	517	31	0	1,280
Water Usage	85	3,263	3,347	9	<1	3,632
Total Project Emissions	**601**	**24,296**	**24,897**	**39**	**0**	**25,999**

Source: Air Quality and Greenhouse Gas Impact Analysis, LSA, December 2017.

Note: While the CH_4 and N_2O emissions are shown as zero, some are actually just less than 1. However, they do contribute to the CO_2e total.

Bio-CO_2 = biologically generated CO_2
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide
NBio-CO_2 = Non-biologically generated CO_2

As shown in Table 4.4.D, the project will result in GHG emissions of 25,999 MT CO2e/yr, which is 0.026 MMT CO_2e per year (MMT CO_2e/yr). For comparison, the existing emissions from the entire SCAG region are estimated to be approximately 176.79 MMT CO_2e/yr, and the existing emissions for the entire State are estimated at approximately 448 MMT CO_2e/yr.

As discussed under Threshold B, the CBUSPA includes Project Design Features and additional mitigation (i.e., MM-GHG-1 and MM-GHG-2) has been identified to provide consistency with the RRG-CAP and in so doing reducing the proposed project's greenhouse gas emissions to a **less than significant** level and no further mitigation is required.

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

The RRG-CAP identifies local greenhouse gas reduction measures by sector and the GHG reduction potential associated with each measure. The proposed Project incorporates certain measures as Design Features. Table 4.7.E details the Project Design Features and additional mitigation that are necessary to ensure consistency with applicable local reduction measures of the City's RRG-CAP.

Table 4.7.E
Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) Consistency Analysis

Measures by Sector	RRG-CAP Consistency Analysis
State and Regional Measures	
Energy	
California Building Energy Efficiency Standards (Title 24, Part 6). Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California (including both investor-owned and publicly owned utilities).	**Consistent.** The proposed Project will implement the Energy Efficiency Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines) and will comply with the requirements of the 2016 California Building Energy Efficiency Standards (Title 24, Part 6) including measures to incorporate energy-efficient building design features
Water	
Water Use Efficiency. Reduce per capita water use by 20% by 2020. SB X7-7 is part of a California legislative package passed in 2009 that requires urban retail water suppliers to reduce per-capita water use by 10% from a baseline level by 2015, and to reduce per capita water use by 20% by 2020. Green accountability performance (GAP) Goal 16 directly aligns with SB X7-7. In Southern California, energy costs and GHG emissions associated with the transport,	**Consistent.** The proposed Project will implement the Water Conservation Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines) and will comply with the requirements of Title 19 – Article VIII – Chapter 19.570 – Water Efficient Landscaping and Irrigation, including measures to increase water use efficiency. Water efficient irrigation systems and devices and drought tolerant landscaping will be installed on the Project site.

Table 4.7.E
Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) Consistency Analysis

Measures by Sector	RRG-CAP Consistency Analysis
treatment, and delivery of water from outlying regions are high. Therefore, the region has extra incentive to reduce water consumption. While this is considered a state measure, it is up to the local water retailers, jurisdictions, and water users to meet these targets.	
Solid Waste	
Construction and Demolition Waste Diversion. Meet mandatory requirement to divert 50% of C&D waste from landfills by 2020 and exceed requirement by diverting 90% of C&D waste from landfills by 2035.	**Consistent.** The proposed Project will implement the Materials and Resources Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines). In compliance with CalGreen requirements, at least 65% of all nonhazardous construction waste generated by the proposed Project would be recycled and/or salvaged (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). Furthermore, 100% of excavated soil shall be reused or recycled.
Transportation	
Pavley and Low Carbon Fuel Standard (LCFS). ARB identified this measure as a "Discrete Early Action Measure." This measure would reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020.	**Consistent.** The Project does not involve the manufacture, sale, or purchase of vehicles. However, vehicles that operate within and access the Project site will comply with Pavley and Low Carbon Fuel Standard. Passenger cars and medium duty and heavy duty trucks and trailers making deliveries will be subject to aerodynamic and hybridization requirements as established by ARB; no feature of the Project will interfere with implementation of these requirements and programs.
Local Reduction Measures	
Energy	
Measure E-2, Shade Trees: Strategically plant trees at new residential developments to reduce the urban heat island effect.	**Consistent.** The proposed Project will implement the CBU Tree Campus USA Urban Forest Management Guidelines. Landscape design and plantings shall complement existing surrounding landscape materials. Shade trees in new landscape designs will be provided to reduce heat island impacts (when shading paved/developed surfaces) and to support the *City of Riverside Green Action Plan* goals.
Measure E-3, Local Utility Programs: Financing and incentives for business and home owners to make energy efficient, renewable energy, and water conservation improvements. **Measure E-4, Renewable Energy Production on Public Property:** Large scale renewable energy installation on publicly owned property and in public rights of way. **Measure E-6, RPU Technology Grants:** RPU grant programs to foster research, development, and administration of innovative solutions to energy problems.	**Consistent.** Nonessential exterior lighting shall be turned off by automatic controllers from 11:00 P.M. to the following evening at dusk. Lighting shall be ramped up to full power (based on zones) when motion is detected in the vicinity. The proposed Project will implement the Energy Efficiency, Solar Energy, and Environmental Quality Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines). Policy 6.1 of the CBU Specific Plan Amendment proposes to improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside building code requirements. New construction projects shall be designed to maximize daylight access for interior occupied spaces. Top lighting and side lighting strategies shall be combined to optimize daylight access for building occupants. Daylighting strategies to be investigated for feasibility include, but are not limited to, exterior/interior light shelves, skylights and monitors, clerestory windows, tubular skylights, and light wells. In accordance with **MM-GHG-1**, energy efficiency elements shall include, at minimum, 2016 Title 24 Energy Code standards, as amended, for all new

Table 4.7.E
Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) Consistency Analysis

Measures by Sector	RRG-CAP Consistency Analysis
	projects. All new development and retrofit projects shall include opportunities for energy efficiency incentive funding through the Riverside Public Utilities Programs and Services. The installation and use of on-site renewable energy systems shall be investigated to reduce demand on existing energy grid infrastructure and to support the *City of Riverside Green Action Plan* goals. New development projects will incorporate high-efficiency mechanical systems as warranted. CBU will investigate the potential for incorporation of highly efficient systems and passive or mixed mode (mechanical and natural ventilation) systems. CBU will reduce energy consumption through ongoing monitoring and re/retro commissioning of building systems to ensure optimal operation. Finally, all energy efficiency upgrades to historic buildings shall comply with RMC Title 20 (Cultural Resources) and Historic Preservation Building Standards. To achieve *City of Riverside Green Action Plan* goals, the University will consider introducing renewable energy such as photovoltaic and solar water heating into new construction projects and in the renovation of academic and residential facilities. Installations on roofs and inconspicuous areas can minimize the visual impact to the campus architecture while still providing energy offsets to essential areas within the campus. Implementation of the CBUSP Amendment would expand the academic curriculum of CBU and facilitate RPU grant programs to foster research, development, and administration of innovative solutions to energy problems.
Transportation	
Measure T-1, Bicycle Infrastructure Improvements: Expand on-street and off-street bicycle infrastructure, including bicycle lanes and bicycle trails. **Measure T-2, Bicycle Parking:** Provide additional options for bicycle parking. **Measure T-3, End of Trip Facilities:** Encourage use of non-motorized transportation modes by providing appropriate facilities and amenities for commuters. **Measure T-4, Promotional Transportation Demand Management:** Encourage transportation demand management strategies. **Measure T-5, Traffic Signal Coordination:** Incorporate technology to synchronize and coordinate traffic signals along local arterials. **Measure T-6, Density:** Improve jobs-housing balance and reduce vehicle miles traveled by increasing household and employment densities. **Measure T-7, Mixed Use Development:** Provide for a variety of development types	**Consistent.** The CBU Specific Plan, as amended, proposes a framework to guide development of campus boundary and facility expansions under a more urban-style development schema in order to further strengthen the campus identity of a quality academic institution with historic roots to the community. Development will be proposed and guided within already urbanized parts of the City, utilizing existing facilities and infrastructure to promote pedestrian, bicycle, and transit-oriented mobility. Future circulation on the main campus has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. Bicycle circulation will continue to share these routes. The original main entry to the CBU campus from Magnolia Avenue will continue to provide key access to the campus. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic on the local road network. Future circulation to and within the CBU Specific Plan Zone will be designed to accommodate all modes of mobility and the demands of projected student enrollment. Linkages within the main campus and from the surrounding community will be strengthened, and pedestrian pathways will continue to be distinct as CBU enhances campus walkability and security. Additionally, landscape design and plantings shall complement existing surrounding

Table 4.7.E
Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) Consistency Analysis

Measures by Sector	RRG-CAP Consistency Analysis
and uses.	landscape materials.
Measure T-8, Pedestrian-Only Areas: Encourage walking by providing pedestrian-only community areas.	New and reconfigured educational, housing, administrative support, athletic, and other facilities will be developed within the main campus area. Support and ancillary facilities also will be established on University-owned properties non-contiguous to the main campus. Parking will be provided on campus to meet the anticipated needs of the student body, CBU staff, and visitors. CBU shall prepare an audit of parking demand and available parking every five years. The audit will be submitted to the Riverside City Planning Division to review and file.
Measure T-9, Limit Parking Requirements for New Development: Reduce requirements for vehicle parking in new development projects.	
Measure T-10, High Frequency Transit Service: Implement bus rapid transit service in the subregion to provide alternative transportation options.	Alternative work schedules/flex-time, preferential parking for carpool vehicles, rideshare vehicle loading areas, vanpool vehicle accessibility, parking pricing, bus stop improvements, on-site child care facilities, and on-site amenities such as cafeterias, restaurants, automated teller machines and other services that would eliminate the need for additional trips would be provided.
Measure T-11, Voluntary Transportation Demand Management: Encourage employers to create TDM programs for their employers.	The Riverside Transit Agency currently provides bus service to the project site; the Gold Line and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site, which support the City's General Plan objectives and policies related to alternative modes of transportation. CBU participates in the Riverside Transit Agency (RTA) Go-Pass / U-Pass Program, offering free and unlimited bus rides on RTA's transit routes. Because the Project site is located in close proximity to an existing bus route, the proposed project would be accessible to existing transit systems.
Measure T-12, Accelerated Bike Plan Implementation: Accelerate the implementation of all or specified components of a jurisdiction's adopted bike plan.	
Measure T-15, Subsidized Transit: Increase access to transit by providing free or reduced passes.	The jobs-to-housing ratio of the SCAG region is currently 1.25 jobs for every household. This standard is used because most residents of the region are employed somewhere in the SCAG region. A City or sub-region with a jobs-to-housing ratio lower than the overall standard of 1.25 jobs for every household would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the sub-area. These longer commutes result in freeway congestion, increased air pollution, and reduced quality of life for commuters. The 2012 jobs-to-housing ratios for the City, County, and SCAG region are 1.30, 0.89, and 1.25, respectively.[17] These jobs/housing ratios indicate that the City trends towards a slightly more "jobs rich" scenario compared to the SCAG region. However, implementation of the CBUSP Amendment would result in a "housing rich" jobs-to-housing ratio of 0.99 in a City currently "jobs rich" according to SCAG. As a matter of CBU policy, every student enrolled at CBU must live on campus until he or she is 21 years old or receives a specified level of financial aid. The CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters.
Measure T-16, Bike Share Program: Create nodes offering bike sharing at key locations throughout the City.	
Measure T-20, Eco-Corridor/Green Enterprise Zone. Create a geographically defined area(s) featuring best practices in sustainable urban design and green building focused on supporting both clean-tech and green businesses.	To improve conditions for and encourage cycling (as well as skateboarding, scootering, and similar mobility modes), CBU will provide appropriate lighting

[17] *Demographics & Growth Forecast (Appendix).* 2016-2040 SCAG RTP-SCS. Table 11. Adopted April 7, 2016.

Table 4.7.E
Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) Consistency Analysis

Measures by Sector	RRG-CAP Consistency Analysis
	on roadways and pathways to serve both pedestrians and bicyclists; install bicycle-related signs to clarify circulation routes and road safety rules, and to highlight potential conflict areas; identify primary bike routes and bicycle parking areas on campus directories; include pavement markings on all travel paths indicating whether and how bicycling is permitted; and provide bicycle parking facilities in any new campus vehicle parking structures.
Water	
Measure W-1, Water Conservation and Efficiency: Reduce per capita water use by 20% by 2020.	**Consistent.** The proposed Project will implement the Water Conservation Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines). All landscaping shall comply with RMC Chapter 19.570 (Water Efficient Landscaping and Irrigation). Irrigation systems shall be synchronized to operate between dusk and dawn to create efficiency of water use. To further sustainability efforts, the irrigation system shall be tied into the on-site wells. In accordance with **MM-GHG-2**, interior plumbing fixtures shall be selected to reduce water usage consistent with local and State directives and best practices. Where feasible, waste heat recovery systems will be incorporated to capture heat from drainage water to pre-heat domestic water supplies. Non-potable water systems (from on-site water wells) will be used for irrigation and other approved uses. As acceptable to permitting health agencies, gray water plumbing systems may be installed in new buildings.
Solid Waste	
Measure SW-1, Yard Waste Collection: Provide green waste collection bins community-wide. **Measure SW-2, Food Scrap and Compostable Paper Diversion:** Divert food and paper waste from landfills by implementing commercial and residential collection program.	**Consistent:** The proposed Project will implement the Materials and Resources Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines). CBU will develop and implement a construction waste management plan for each construction project consistent with the City's waste stream diversion requirements. The University will provide at multiple locations on campus clearly marked and easily accessible areas for the collection and temporary storage of recyclable materials, including but not limited to paper, plastic, glass, cardboard, and metals. Collection areas for dormitories and other on-campus multiple-unit residences will be provided inside buildings on each level (at a minimum), and central collection enclosure areas will be provided adjacent to (or within) exterior trash collection enclosures.

Source: Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP). City of Riverside. Adopted January 5, 2016 under resolution No. 22942.

Vehicle Miles of Travel (VMT) Reduction Strategy

The CBU SP provides a number of strategies to reduce vehicle miles of travel, that serve to reduce air quality emissions and GHGs. Students under the age of 21 or receiving financial aid must live on campus, where food service, a campus store, and a medical clinic are available to meet daily needs without reliance of a vehicle. The campus is adjacent to public transportation. The Riverside Transit Agency's Gold Line and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site. An Events Center has been constructed to accommodate events on campus that previously required travel to other venues in other communities.

4.7.6 Mitigation Measures

The following mitigation measures are recommended to reduce GHG emissions:

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

- Increase insulation such that heat transfer and thermal bridging is minimized;
- Limit air leakage through the structure or within the heating and cooling distribution system to minimize energy consumption;
- Incorporate ENERGY STAR® or better rated windows, space heating and cooling equipment, light fixtures, appliances, or other applicable electrical equipment; and
- Install efficient lighting and lighting control systems. Use daylight as an integral part of the lighting systems in buildings.

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

MM-GHG-2: To ensure consistency with the City's RRG-CAP and to implement the Water Conservation Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: 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.

4.7.7 Environmental Impacts After Mitigation Is Incorporated

Table 4.7.E identifies the Project Design Features as well as the additional Mitigation Measures defined in Section 4.7.6 that provide consistency with the RRG-CAP. Table 4.7.F shows the resulting GHG emissions with implementation of the Project Design Features and mitigation measures MM-GHG-1 and MM-GHG-2.

Table 4.7.F
Operational Greenhouse Gas Emissions with Mitigation

Source	Pollutant Emissions, MT/year					
	Bio- CO_2	**NBio- CO_2**	**Total CO_2**	**CH_4**	**N_2O**	**CO_2e**
Construction emissions amortized over 30 years	0	567	567	<1	0	567
Operational Emissions:						
Area Sources	0	67	67	<1	0	68
Energy Sources	0	13,337	13,337	<1	<1	13,374
Mobile Sources	0	4,708	4,708	<1	0	4,717
Waste Sources	413	0	413	24	0	1,024
Water Usage	68	2,610	2,678	7	<1	2,905
Total Project Emissions	**481**	**21,289**	**21,770**	**32**	**<1**	**22,655**

Source: Table N – Air Quality and Greenhouse Gas Impact Analysis, LSA, December 2017.

Note: While the CH_4 and N_2O emissions are shown as zero, some are actually just less than 1. However, they do contribute to the CO_2e total.

Bio-CO_2 = biologically generated CO_2
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT/yr = metric tons per year
N_2O = nitrous oxide
NBio-CO_2 = Non-biologically generated CO_2

As shown in Table 4.7.F, the Project's GHG emissions with implementation of Project Design Features and mitigation is estimated to be 22,655 $MTCO_2e$/year. In comparison, the Project's GHG emissions without implementation of Project Design Features and mitigation is estimated 25,999 $MTCO_2e$/year corresponding to a 12.86 percent reduction. With implementation of Project Design Features and mitigation measures MM-GHG-1 and MM-GHG-2, the Project will be consistent with the City's RRG-CAP. Therefore, through consistency with a qualified CAP, the Project would generate greenhouse gas emissions that would have a less significant impact.

4.7.8 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Air Resources Board (ARB). 2017. *California Greenhouse Gas Emission Inventory-2017 Edition*. https://www.arb.ca.gov/cc/inventory/data/data.htm, accessed October 2017.

ARB. 2014. *First Update to the Climate Change Scoping Plan: Building on the Framework.*

California Baptist University. 2017. *California Baptist University Specific Plan*. City of Riverside.

City of Riverside. 2010. *City of Riverside Baseline Community Greenhouse Gas Emissions Inventory*. July.

City of Riverside. 2012. *Green Action Plan.*

IPCC. (Intergovernmental Panel on Climate Change). 2013. *Climate Change 2013: The Physical Science Basis.* IPCC Working Group I Contribution to the Fifth Assessment Report. Website: http://www.climatechange2013.org, accessed December 2017.

Southern California Association of Governments. 2016. *Demographics & Growth Forecast (Appendix). 2016-2040 SCAG RTP-SCS. Table 11.* April.

State of California. 2008. *Water-Energy Sector Summary, AB 32 Scoping Plan, GHG Emission Reduction Strategies.* April. http://www.climatechange.ca.gov/climate_action_team/reports/CAT_subgroup_reports/Water_Sector_Summary_and_Analyses.pdf, accessed December 2017.

State of California. 2013. *"Preparing California for Extreme Heat – Guidance and Recommendations."* October. Website: http://www.climatechange.ca.gov/climate_action_team/reports/Preparing_California_for_Extreme_Heat.pdf, accessed December 2017.

United Nations Environment Programme. 2007. *Buildings and Climate Change: Status, Challenges and Opportunities.* Paris, France. http://www.unep.fr/shared/publications/pdf/DTIx0916xPA-BuildingsClimate.pdf, accessed December 2017.

United Nations Framework Convention on Climate Change (UNFCCC). GHG data from UNFCCC. Website: http://unfccc.int/ghg_data/ghg_data_unfccc/items/4146.php, accessed December 2017.

United States Environmental Protection Agency (EPA). 2010. *Methane and Nitrous Oxide Emissions from Natural Sources*. Office of Atmospheric Programs. Washington, D.C. April. http://nepis.epa.gov/Exe/ZyPDF.cgi/P100717T.pdf?Dockey=P100717T.pdf, accessed December 2017.

EPA. 2017. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2015. United States Environmental Protection Agency.* https://www.epa.gov/sites/production/files/2017-02/documents/2017_complete_report.pdf, accessed October 2017.

THIS PAGE INTENTIONALLY LEFT BLANK

4.8 HAZARDS AND HAZARDOUS MATERIALS

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential impacts to hazards and hazardous materials. The EIR evaluates the potential impacts from implementation of the proposed Project related to: emitting hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; being located on a hazardous materials list that could create a hazard to the public or the environment; interfering with an adopted emergency response plan or emergency evacuation plan; being located within the administration of an Airport Land Use Compatibility Plan (ALUCP), obstructing an adopted emergency evacuation plan; and/or exposing persons or structures to risk of wildfires.

In response to the NOP, the Department of Toxic Substances Control (DTSC) submitted written comments to the City in a letter dated June 2, 2016. The DTSC recommends lead based paint and organochlorine pesticides investigations, and applicable mitigation, for buildings and structures constructed prior to 1978 in accordance with DTSCs "*Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers,"* dated June 9, 2006.[1] Additionally, according to the DTSC, areas of the project site previously used for agricultural purposes may contain pesticides and fertilizers in the soil. Those areas comprised of agricultural properties should be investigated and possibly mitigated in accordance with the "*Interim Guidance for Sampling Agricultural Soils (Third Revision),"* dated August 2008[2] if they are proposed for development. The DTSC is also administering the Revolving Loan Fund Program to provide financial support for investigating and remediating hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community.

4.8.1 Setting

The approximately 167-acre CBU Specific Plan Zone is generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street and surrounded by existing urban uses. As of 2017, the CBU campus had one main gate and several secondary or emergency access points to/from the surrounding public street system. Surrounding land uses include single-family and multi-family residential, church, and convalescent uses to the north; single-family residential,

[1] *Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers.* Department of Toxic Substances Control. June 9, 2006.

[2] *Interim Guidance for Sampling Agricultural Soils (Third Revision).* Department of Toxic Substances Control. August 2008.

retail, and office uses to the east; single-family and multi-family residential, commercial, and school uses to the west; and State Route (SR-91) to the south. General commercial uses are located south of SR-91, including car dealerships.

The area encompassed by the CBU Specific Plan Zone developed slowly during the late 19th and early 20th Centuries as small citrus groves and associated farm- and ranch-steads. As development of the region continued, the Neighbors of Woodcraft, a fraternal organization, acquired a portion of the subject property and converted an on-site existing structure into a retirement home, later constructing an adjacent hospital. In 1955, the California Baptist College acquired the Neighbors of Woodcraft complex and converted the on-site buildings to educational facilities, and the subject property has been used for educational purposes ever since.

Hazardous Databases Review

A review of hazardous materials site lists compiled pursuant to Government Code Section 65962.5 found that the project site is not included on any such lists.[3]

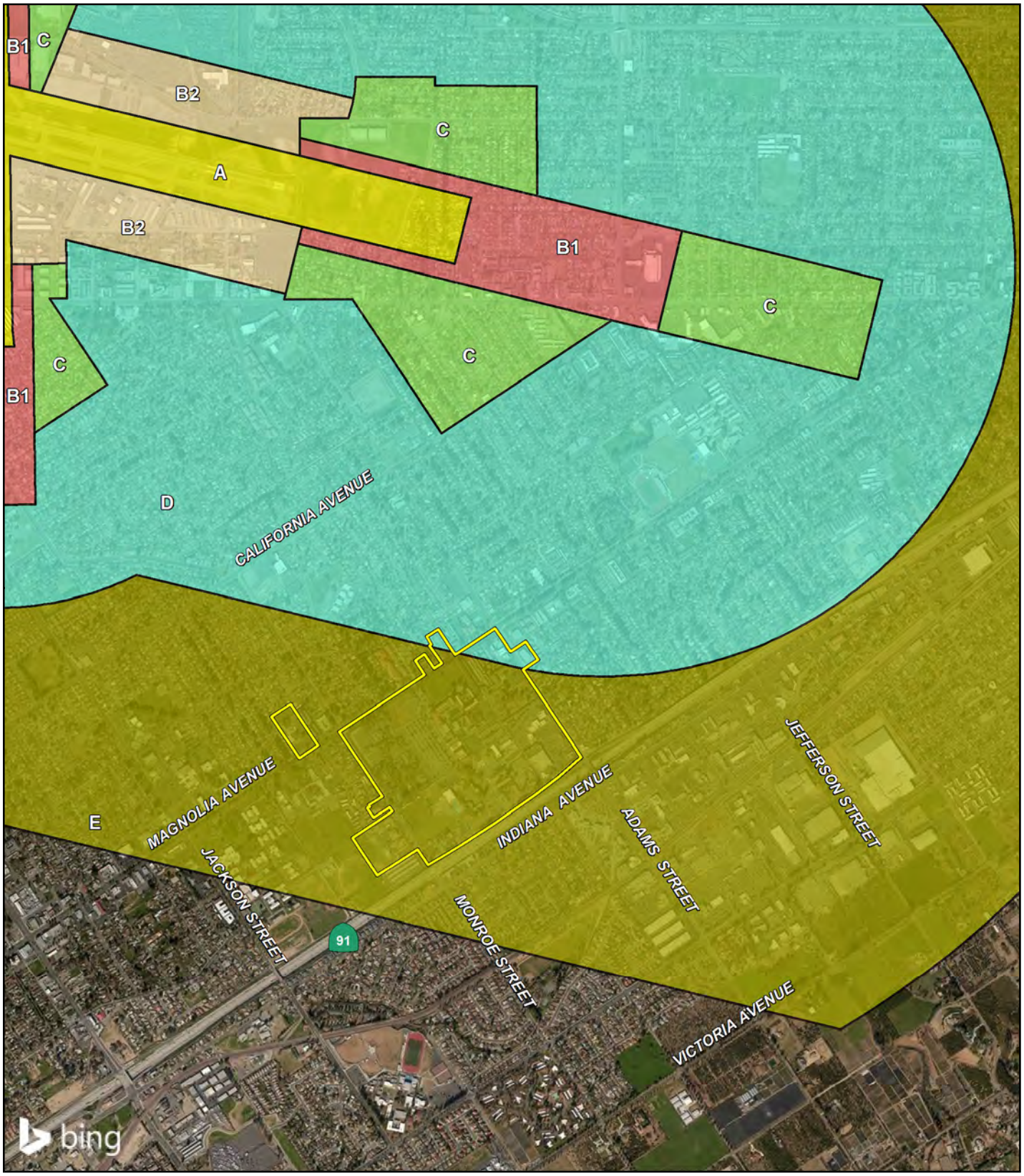
Airport Land Use Compatibility Zones

Portions of the CBU Specific Plan Zone lie within Compatibility Zone D (Primary Traffic Patterns and Runway Buffer Area) and Compatibility Zone E (Other Airport Environs) of the Land Use Compatibility Plan prepared for Riverside Municipal Airport (ALUCP), as shown on Figure 4.8-1. The proposed CBUSP Amendment was reviewed and approved by the Riverside County Airport Land Use Commission (RCALUC) on November 9, 2017 under case ZAP 1090RI17 and was determined consistent with the *2005 Riverside Municipal Airport Land Use Compatibility Plan*. All future development facilitated under the CBUSP Amendment within Compatibility Zone D and Compatibility Zone E will occur in accordance with the ALUCP. Project-specific conditions imposed by the ALUCP will be implemented as applicable.

CBU Department of Safety Services

CBU maintains its Department of Safety Services (DSS) to enhance the safety and security of the CBU community by assisting with the protection of students, employees, and property. The DSS provides 24-hour assistance to the campus community, and all areas of the campus are regularly patrolled. DSS also assumes an educational role by teaching members of the CBU community to support one another and to be vigilant of their surroundings.

[3] *DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List)*. California Department of Toxic Substances Control. 2018. http://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE). (Accessed February 27, 2018.).



LSA

LEGEND

- CBU Specific Plan Zone
- **Airport Compatibility Zones**
- Zone A
- Zone B1
- Zone B2
- Zone C
- Zone D
- Zone E

N

0 1000 2000

FEET

SOURCE: Bing Aerial, 2015; Riverside County, 2015

FIGURE 4.8-1

California Baptist University
Specific Plan Amendment Project
Environmental Impact Report

Riverside Municipal Airport
Land Use Compatibility Map

I:\CTR1501\Reports\EIR\fig4-8-1_AirportCompatZones.mxd (8/8/2018)

THIS PAGE INTENTIONALLY LEFT BLANK

Existing Conditions

The proposed Project site is developed with the CBU campus. The site contains improvements consisting of academic and student housing buildings, paved parking lots, grassy athletic fields and open space lawns, a water quality detention basin, concrete walkways, ornamental landscaping, and roadways. Total vegetation cover on the Project site is approximately 15 percent consisting of grassy athletic fields and open space lawns, ornamental trees, shrubs, and planters, and a constructed storm water detention basin. Minimal native vegetation remains within the Project site or surrounding properties.

4.8.2 Related Regulations

Federal Regulations

Several federal agencies regulate hazardous materials. These include the United States Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), and the United States Department of Transportation (USDOT). Applicable federal regulations are contained primarily in Titles 10, 29, 40, and 49 of the Code of Federal Regulations (CFR). In particular, Title 49 of the CFR governs the manufacture of packaging and transport containers, packing and repacking, and labeling, as well as marking hazardous material transport. Major federal laws and issue areas include the following statutes and regulations:

- **Resource Conservation and Recovery Act (RCRA).** Subtitle C of the Resource Conservation and Recovery Act (RCRA) of 1976 addresses hazardous waste generation, handling, transportation, storage, treatment, and disposal. It includes requirements for a system that uses hazardous waste manifests to track the movement of waste from its site of generation to its ultimate disposition. Subtitle D establishes national minimum requirements for solid waste disposal sites and practices. It requires states to develop plans for the management of wastes within their jurisdictions. Subtitle I requires monitoring and contaminant systems for underground storage tanks that hold hazardous materials. Owners of tanks must demonstrate financial assurance for the cleanup of a potential leaking tank.
- **Hazardous and Solid Waste Amendments Act**. Passed into law on November 8, 1984, the Hazardous and Solid Waste Amendments Act amends the RCRA by establishing a national policy that, wherever feasible, the generation of hazardous waste is to be reduced or eliminated as expeditiously as possible. Waste that is nevertheless generated shall be treated, stored, or disposed of so as to minimize the present and future threat to human health and the environment.
- **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).** Discovery of environmental health damage from disposal sites prompted the

United States Congress to pass CERCLA, also known as Superfund. The purpose of CERCLA is to identify and cleanup chemically contaminated sites that pose a significant environmental health threat. The Hazard Ranking System is used to determine whether a site should be placed on the National Priorities List for cleanup activities.

- **Superfund Amendments and Reauthorization Act (SARA)**. The Superfund Amendments and Reauthorization Act (SARA) pertains primarily to emergency management of accidental releases. It requires formation of state and local emergency planning committees, which are responsible for collecting, material handling, and transportation data for use as a basis for planning. Chemical inventory data are made available to the community at large under the "right-to-know" provision of the law. Additionally, SARA also requires annual reporting of continuous emissions and accidental releases of specified compounds. These annual submissions are compiled into a nationwide Toxics Release Inventory (TRI).

- **Emergency Planning and Community Right-to-Know Act (SARA Title III)**. Authorized by Title III of the Superfund Amendments and Reauthorization Act (SARA), the Emergency Planning & Community Right-to-Know Act (EPCRA) was enacted by Congress as the national legislation on community safety. This law is designed to help local communities protect public health, safety, and the environment from chemical hazards. Each state appoints a State Emergency Response Commission (SERC). The California SERC delegates jurisdiction to regional Emergency Planning Districts and names a Local Emergency Planning Committee (LEPC) for each district. Region VI comprises the county areas of Imperial, Inyo, Mono, Riverside, San Bernardino, and San Diego. The LEPC members' fields of expertise (e.g. fire, health, agricultural, industry, first aid, local environmental, hospital, transportation, law enforcement, community groups, administering agencies, civil defense, elected official, emergency management, and media) provide the assurance that all the necessary elements of the planning process are represented. The Environmental Health Services Division is the administering agency for Riverside County.

- **Hazardous Substances Act (15 U.S.C. 1261−1278).** Certain hazardous household products (hazardous substances) must bear cautionary labeling to alert consumers to the potential hazards that those products present and to inform them of the measures they need to protect themselves from those hazards. Any product that is toxic, corrosive, flammable or combustible, an irritant, a strong sensitizer, or that generates pressure through decomposition, heat, or other means requires labeling, if the product may cause substantial personal injury or substantial illness during or as a proximate result of any customary or reasonable foreseeable handling or use, including reasonable foreseeable ingestion by children.

- **U.S. Environmental Protection Agency (EPA).** The EPA is the primary federal agency responsible for the implementation and enforcement of hazardous materials regulations. In most cases, enforcement of environmental laws and regulations established at the federal level is delegated to state and local environmental regulatory agencies.

- **Federal Aviation Regulations, Part 77.** Federal Aviation Regulations, Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for evaluating the effect of the construction or alteration on operating procedures, determining the potential hazardous effect of the proposed construction on air navigation, identifying mitigating measures to enhance safe air navigation, and charting of new objects. Notification allows the Federal Aviation Administration (FAA) to identify potential aeronautical hazards in advance to prevent or minimize the adverse impacts to the safe and efficient use of navigable airspace.

State Regulations

Primary State agencies with jurisdiction over hazardous chemical materials management are the Department of Toxic Substances Control (DTSC) and the local Santa Ana Regional Water Quality Control Board (RWQCB). Other State agencies involved in hazardous materials management are the Department of Industrial Relations (State Occupational Safety and Health Administration implementation), Office of Emergency Services (California Accidental Release Prevention implementation), California Department of Fish and Wildlife (CDFW), California Air Resources Board (CARB), California Department of Transportation (Caltrans), State Office of Environmental Health Hazard Assessment (Proposition 65 implementation), and the California Integrated Waste Management Board (CIWMB).

The enforcement agencies for hazardous materials transportation regulations are the California Highway Patrol and Caltrans. Hazardous materials and waste transporters are responsible for complying with all applicable packaging, labeling, and shipping regulations. South Coast Air Quality Management District Rules and Regulations pertain to asbestos abatement (including Rule 1403) and Construction Safety Orders 1529 (pertaining to asbestos) and 1532.1 (pertaining to lead) from Title 8 of the California Code of Regulations (CCR). Hazardous chemical and biohazardous materials management laws in California include the following statutes:

- **Hazardous Materials Management Act (HMMA)**. This act requires that businesses handling or storing certain amounts of hazardous materials prepare a hazardous materials business emergency plan (HMBEP) that includes an inventory of hazardous materials stored on site (above specified quantities), an emergency response plan, and an employee training program.

- **Hazardous Waste Control Act (HWCL)**. Codified at California Health and Safety Code, Division 20, Chapter 6.5, Article 2, Section 25100 et seq., this act authorizes the DTSC and local Certified Unified Program Agencies (CUPAs) to regulate facilities that generate or treat hazardous waste.
- **Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)**. This act requires the governor to publish and update, at least annually, a list of chemicals known to the state to cause cancer, birth defects, or other reproductive harm, and to inform citizens about exposures to such chemicals.
- **Hazardous Waste Management Planning and Facility Siting**. Also known as the Tanner Act, Assembly Bill (AB) 2948 (1986) requires counties to prepare hazardous waste management plans for DTSC approval, and prescribes specific public participation activities that must be carried out during the local land use permit process for siting new or expanding off-site commercial treatment, storage, and disposal facilities.
- **Hazardous Materials Storage and Emergency Response Plans**. AB 2185, which regulates hazardous materials storage and emergency response plans, requires immediately reporting to local fire departments and the Office of Emergency Services any release or threatened release of a hazardous material, regardless of the amount handled by the business.
- **California Medical Waste Management Act**. As codified in the California Health and Safety Code, Sections 117600–118360, the act establishes procedures for the proper handling, storage, treatment, and transportation of medical waste.
- **Land Disposal Restrictions**. Restrictions codified in 22 CCR 18 were set up by Congress in 1984 for the EPA. These restrictions ensure that toxic constituents present in hazardous waste are properly treated before hazardous waste is land disposed.

State regulations and agencies pertaining to hazardous materials management and worker safety are described in the following subsections.

California Environmental Protection Agency (Cal/EPA) has broad jurisdiction over hazardous materials management in the State. Within Cal/EPA, the DTSC has primary regulatory responsibility for hazardous waste management and cleanup. Enforcement of regulations has been delegated to local jurisdictions that enter into agreements with the DTSC for the generation, transport, and disposal of hazardous materials under the authority of the Hazardous Waste Control Law.

Regional Water Quality Control Board. Along with the DTSC, the RWQCB is responsible for implementing regulations pertaining to management of soil and groundwater investigation and cleanup. RWQCB regulations are contained in Title 27 of the CCR. Additional State regulations

applicable to hazardous materials are contained in Title 22 of the CCR. Title 26 of the CCR is a compilation of those sections or titles of the CCR that are applicable to hazardous materials.

Investigation and Cleanup of Contaminated Sites. The oversight of hazardous materials release sites often involves several different agencies that may have overlapping authority and jurisdiction. The DTSC and RWQCB are the two primary State agencies responsible for issues pertaining to hazardous materials release sites. Air quality issues related to remediation and construction at contaminated sites are also subject to Federal and State laws and regulations that are administered at the local level.

Investigation and remediation activities that would involve potential disturbance or release of hazardous materials must comply with applicable federal, State, and local hazardous materials laws and regulations. The DTSC has developed standards for the investigation of sites where hazardous materials contamination has been identified or could exist based on current or past uses. The standards identify approaches to determine whether a release of hazardous wastes/ substances exists at a site and delineates the general extent of contamination; estimates the potential threat to public health and/or the environment from the release and provides an indicator of relative risk; determines whether an expedited response action is required to reduce an existing or potential threat; completes preliminary project scoping activities to determine data gaps; and identifies possible remedial action strategies to form the basis for development of a site strategy.

Government Code Section 65962.5. Pursuant to Government Code 65962.5, environmental regulatory database lists were reviewed to identify and locate properties with known hazardous substance contamination within the proposed Project area (California Government Code, Section 65960 et seq.). Four State agencies are required to provide lists of facilities that have contributed, harbor, or are responsible for environmental contamination within their jurisdiction. The four State agencies that are required to provide these lists to the Secretary for Environmental Protection include the DTSC, the State Department for Health Services, the State Water Resources Control Board (SWRCB), and the CIWMB. The Secretary for Environmental Protection then takes each of the four respective agency lists and forms one list, referred to as the Hazardous Waste and Substances Site List – Site Cleanup and also known as the Cortese List, which is made available to every city and/or county in California.[4]

[4] *DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List)*. DTSC (California Department of Toxic Substances Control). 2018. http://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE). (Accessed February 27, 2018.).

The DTSC maintains lists of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code; land designated as hazardous waste property or border zone property pursuant to Article 11, Chapter 6.5, Division 20 of the Health and Safety Code; information received by the DTSC pursuant to Section 25242 of the Health and Safety Code on hazardous waste disposal on public land; sites listed pursuant to Section 25356 of the Health and Safety Code; and sites on the Abandoned Site Assessment Program.

The Department for Health Services maintains lists of all public drinking water wells that contain detectable levels of organic contaminants and wells that are subject to special water analysis. The SWRCB maintains lists of unauthorized release reports for Underground Storage Tanks (USTs) pursuant to Section 25295 of the Health and Safety Code; solid waste disposal facilities from which there has been a migration of hazardous waste; and all cease-and-desist orders issued after January 1, 1986, concerning hazardous waste discharges. The CIWMB maintains lists of solid waste disposal facilities from which there is a known migration of hazardous waste.

Local Regulations

City of Riverside General Plan 2025. The City's *General Plan 2025*[5] includes the following objectives and policies related to hazards and hazardous materials that will be applied to the proposed Project.

Public Safety Element

Objective PS-3	Minimize risks associated with the storage, transport, and disposal of hazardous materials.
Policy PS-3.1	Ensure that hazardous materials used in business and industry are handled properly.
Policy PS-3.2	Provide the Fire Department with resources to ensure that hazardous materials used and generated by businesses are handled properly.
Policy PS-3.4	Reduce the risks associated with ground transportation hazards, where feasible.
Policy PS-3.5	Encourage sewer service to minimize groundwater contamination.
Objective PS-4	Protect the community from hazards related to air and ground transportation.

[5] *General Plan 2025*. City of Riverside. 2007.

Policy PS-4.1	Minimize the risk of potential hazards associated with aircraft operations at the Riverside Municipal Airport, March Air Reserve Base/March Inland Port and Flabob Airport through the adoption and implementation of the Airport Protection Overlay Zone and the Riverside County Airport Land Use Compatibility Plan.
Policy PS-4.2	When planning for development near airports, anticipate possible increases in airport activity and expansion of airport facilities and services and the effects these changes may have on public safety.
Policy PS-4.3	Encourage development in the vicinity of the Riverside Municipal Airport that would not cause land use conflicts, hazards to aviation or hazards to the public and that is in compliance with the Riverside County Airport Land Use Compatibility Plan for the airport.
Policy PS-4.5	Review the Riverside Municipal Airport Master Plan periodically to update operational and safety procedures, reflect State and Federal mandates, better utilize airport property and recommend land use capability standards for land surrounding the airport.
Policy PS-4.6	Ensure that development within airport influence areas is consistent with the Airport Protection Overlay Zone development standards and the Riverside County Airport Land Use Compatibility Plan.
Policy PS-4.12	Implement roadway improvements identified in the Circulation and Community Mobility Element intended to improve roadway safety.
Objective PS-6	Protect property in urbanized and non-urbanized areas from fire hazards.
Policy PS-6.3	Integrate fire safety considerations in the planning process.
Policy PS-6.5	Mitigate existing fire hazards related to urban development or patterns of urban development as they are identified and as resources permit.
Policy PS-6.10	Identify noncontiguous streets and other barriers to rapid response and pursue measures to eliminate the barriers.
Objective PS-9	Minimize the effects from natural and urban disasters by providing adequate levels of emergency response services to all residents in Riverside.

Policy PS-9.2 Support the Riverside Emergency Management Office in coordinating the City's response to disasters, providing public outreach and presentations and assisting residents to prepare for major events.

Policy PS-9.4 Ensure that equipment and structures designed to provide emergency disaster services are located and designed to function after a disaster or emergency event, or relocate any such structures which are not adequate to provide emergency services.

Policy PS-9.5 Provide effective and relevant information to the public regarding disaster preparedness.

Policy PS-9.7 Identify actions to reduce the severity and probability of hazardous occurrences.

Policy PS-9.8 Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding and structural and wildland fires by requiring feasible mitigation of such impacts on discretionary development projects.

Objective PS-10 Improve the community's ability to respond effectively to emergencies.

Policy PS-10.3 Ensure that public safety infrastructure and staff resources keep pace with new development planned or proposed in Riverside and the Sphere of Influence.

Policy PS-10.4 Continue to ensure that each development or neighborhood in the City has adequate emergency ingress and egress, and review neighborhood access needs to solve problems, if possible.

Policy PS-10.5 Coordinate with local agencies and organizations to educate all residents and businesses to take appropriate action to safeguard life and property during and immediately after emergencies.

Land Use and Urban Design Element

Objective LU-22 Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port, Riverside Municipal and Flabob Airports.

Policy LU-22.2 Work cooperatively with the Riverside County Airport Land Use Commission in developing, defining, implementing and protecting airport

influence zones around the MARB/MIP, Riverside Municipal, and Flabob Airports and in implementing the new Airport Land Use Compatibility Plan.

Policy LU-22.3 Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise.

Policy LU-22.4 Adopt and utilize an Airport Protection Overlay Zone and the Riverside County Airport Land Use Compatibility Plan as it affects lands within the City of Riverside.

Policy LU-22.5 Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted on Figure PS-6 – Airport Safety Zones and Influence Areas for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible.

Policy LU-22.7 Prior to the adoption or amendment of the General Plan or any specific plan, zoning ordinance or building regulation affecting land within the airport influence areas of the airport land use compatibility plan for Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport, refer such proposed actions for determination and processing by the ALUC as provided by Public Utilities Code Section 21670.

Policy LU-22.9 All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.

The City's *Final General Plan Program EIR* identifies hazardous waste sites as shown on Figure 5.7-1 of the *Final General Plan Program EIR*.[6] There are seven Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) sites in the City; of

[6] *Chapter 5.7-Hazards and Hazardous Materials. City of Riverside General Plan and Supporting Documents EIR.* Figure 5.7-1. City of Riverside. November 2007.

these seven, one is on the National Priority List. The Project site is not identified as a hazardous waste site in the City's General Plan.

Riverside County Airport Land Use Compatibility Plan. The Riverside County Airport Land Use Commission (RCALUC) administers the Airport Land Use Compatibility Plans (ALUCP) for airports countywide. The Riverside County ALUCP are designed to provide guidance for conducting airport land use compatibility planning as required by Article 3.5, Airport Land Use Commissions, Public Utilities Code Sections 21670 – 21679.5. The intent of the CBUSP Amendment is to maintain consistency with the regulations defined in the Riverside County ALUCP for the Riverside Municipal Airport.[7] Portions of the CBU Specific Plan Zone area lie within Zone D (Primary Traffic Patterns and Runway Buffer Area), while the majority of the campus is within Zone E (Other Airport Environs) of the Riverside Municipal Airport ALUCP. The proposed CBUSP Amendment was reviewed and approved by the RCALUC on November 9, 2017 under case ZAP 1090RI17 and was determined consistent with the *2005 Riverside Municipal Airport Land Use Compatibility Plan*.

4.8.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, the project could have a significant impact on hazards and hazardous materials if the proposed project would:

- (Threshold A) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- (Threshold B) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment,
- (Threshold C) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.
- (Threshold D) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

[7] *Current Compatibility Plans.* Riverside County Airport Land Use Commission. http://www.rcaluc.org/Plans/New-Compatibility-Plan. (Accessed February 27, 2018).

- (Threshold E) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area.
- (Threshold F) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area.
- (Threshold G) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- (Threshold H) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Methodology

The analysis of potential hazards and hazardous materials impacts is based upon the Safety Element of the City's *General Plan 2025*, programmatic analysis of the City's *General Plan 2025 and Supporting Documents EIR*, a review of the CERCLIS database, and other documents such as the City's Municipal Code, and the City's Standard Design Guidelines and Sign Guidelines, which were reviewed and summarized to establish existing conditions. In determining the level of significance, the analysis assumes that construction and operation of the proposed Project would comply with relevant federal and State laws and regulations, as well as the CBUSP Amendment and the City's *General Plan 2025* objectives and policies.

4.8.4 Project Design Features

The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions in order to strengthen the campus identity. The CBUSP Amendment proposes design guidelines and elements to enhance the safety and security of the CBU Community as it transitions to an urban-style campus from the current suburban model.

Pursuant to California Health and Safety Code Section 25507, CBU has established and implements a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material in accordance with Section 25503. Specifically, CBU developed its *Hazardous Material & Hazardous Waste Maintenance Program* to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site.[8] The plan is constantly updated and outlines proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an

[8] *Hazardous Material & Hazardous Waste Maintenance Program*. California Baptist University, Department of Environmental Health and Safety. 2018, as amended.

updated spill contingency plan, outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol. The step by step procedures for initial spill response and reporting requirements were developed during exploration for employees and contractors to reference in the event of a spill. This plan was developed to educate employees/contractors to promote spill prevention and minimize spill occurrences.

CBU maintains its DSS to assist with the protection of students, employees, and property. The DSS provides 24-hour assistance to the campus community, and all areas of the campus are regularly patrolled. The DSS also assumes an educational role by teaching members of the CBU community to support one another and to be vigilant of their surroundings.

As required by law, the University maintains an Emergency Response and Safety Handbook and Annual Security Report which is available to all current students, faculty, and staff. It is also available upon request to applicants for employment or enrollment (or parents). The Annual Security Report is distributed by the DSS throughout the year to new students at registration and to new employees with their new-hire-packet.

Future circulation within the original campus core has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. Emergency vehicle access routes have been planned and designed in strategic locations throughout the CBU Specific Plan Zone to ensure emergency access is sufficient and remains unobstructed and compliant with the California Fire Code and all City codes and regulations.

4.8.5 Environmental Impacts Before Mitigation

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

The CBUSP Amendment does not propose a specific development project; it does, however, propose a framework under which specific development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment. As a University campus with educational, residential, and commercial uses, future development projects may include the transport, use, or disposal of hazardous materials.

The United States Department of Transportation (USDOT) Office of Hazardous Materials Safety prescribes strict regulations for the safe transportation of hazardous materials, as described in

Title 49 of the *Code of Federal Regulations*, and implemented by Title 13 of the CCR. Additionally as previously stated, CBU has established and implements a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material pursuant to California Health and Safety Code Sections 25503 and 25507. Specifically, CBU developed its *Hazardous Material & Hazardous Waste Maintenance Program* to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site.[9] The plan is constantly updated and outlines proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an updated spill contingency plan, outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol. The step by step procedures for initial spill response and reporting requirements were developed during exploration for employees and contractors to reference in the event of a spill. This plan was developed to educate employees/contractors to promote spill prevention and minimize spill occurrences.

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

Threshold B: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

The CBUSP Amendment does not propose a specific development project; it does, however, propose a framework under which specific development projects will be planned, designed, and executed in the future in order to expand campus facilities to facilitate the anticipated increase in student enrollment. As a University campus with educational, residential, and commercial uses containing historic-era facilities, some of which are over 100 years old, future development projects may involve the release of hazardous materials such as asbestos and lead based paint into the environment.

The area encompassing the CBU Specific Plan Zone developed slowly during the late 19th and early 20th Centuries as small citrus groves and associated farm- and ranch-steads.[10] Agricultural

[9] *Hazardous Material & Hazardous Waste Maintenance Program*. California Baptist University, Department of Environmental Health and Safety. 2018, as amended.

[10] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 2, Section A. City of Riverside. August 2018.

chemicals, such as pesticides, herbicides, and fertilizers likely were used on the Project site. However, by 1975, no agricultural uses remained on the project site, and previous agricultural properties were developed for academic, administrative, and athletic purposes.[11] The Project site's former use for agriculture therefore does not constitute a significant human or environmental health risk from pesticides in the soil. Notwithstanding, future development administered pursuant to the CBUSP Amendment that would require grading permits and/or renovation, rehabilitation, or demolition of CBU structures shall implement mitigation measure **MM-HAZ-1,** which would require a Phase I Environmental Site Assessment in accordance with American Society for Testing and Materials (ASTM) Standard of Practice E 1527-13, "Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process." The Phase I Environmental Site Assessment would determine if a development site has the potential to contain hazardous materials. If the Phase I determines there is the potential for hazardous materials, a Phase II Assessment will be required to include soil testing and testing of paint. If the Phase II Assessment determines there are hazardous materials on a development site within the proposed CBU Specific Plan Zone, then remediation will be required prior to renovation, rehabilitation, or demolition of CBU structures.

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

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

[11] Nationwide Environmental Title Research, LLC. 1969 and 1975 USGS 7.5' Topographic Maps (Riverside West, CA Quadrangle, T3S, R5W, Sections 5 and 8, San Bernardino Base Meridian) www.historicaerials.com. (Accessed August 15, 2017).

With implementation of mitigation measures **MM-HAZ-1** and **MM-HAZ-2** the Project's impacts from the release of hazardous materials into the environment are **less than significant with mitigation incorporated.**

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

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

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

CBU shall continue to implement its *Hazardous Material & Hazardous Waste Maintenance Program* to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site, detail proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an updated spill contingency plan, outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol.[12] In addition, CBU shall implement Mitigation Measure **MM-HAZ-2** for all future development activities that would involve renovation, rehabilitation, or demolition of existing CBU structures constructed prior to 1978, which will ensure that all ACM, LBP, and/or organochlorine pesticides-containing materials are identified and remediated per the requirements identified by the County of Riverside Department of Environmental Health (DEH). Through compliance with existing federal and State regulations described above, as well as **MM-HAZ-2**, impacts associated with the exposure of schools to

[12] *Hazardous Material & Hazardous Waste Maintenance Program*. California Baptist University, Department of Environmental Health and Safety. 2018, as amended.

hazardous materials handled or emitted by implementation of the CBUSP Amendment will be **less than significant with Mitigation Incorporated**.

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

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

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

The Riverside County Airport Land Use Commission (RCALUC) has developed Land Use Compatibility Plans for each airport in the County of Riverside, including the Riverside Municipal Airport, which is located approximately 1.1 miles north of the CBU Specific Plan Zone. The proposed CBUSP Amendment was reviewed and approved by the Riverside County Airport Land Use Commission (RCALUC) on November 9, 2017 under case ZAP 1090RI17 and was determined consistent with the *2005 Riverside Municipal Airport Land Use Compatibility Plan*.

The northeastern corner of the CBU Specific Plan Zone lies within Zone D (Primary Traffic Patterns and Runway Buffer Area), with the remainder of CBUSP located in Zone E (Other Airport Environs) of the Land Use Compatibility Plan prepared for Riverside Municipal Airport,[13] as shown on Figure 4.8-1. Proposal for new buildings or structures and proposals for reuse of (i.e., change in use with or without reconstruction) of existing buildings within a portion of the campus in Airport Land Use Compatibility Zone D are subject to the City's administrative

[13] *Riverside County Airport Land Use Compatibility Plan Policy Document*. Adopted by Riverside County Airport Land Use Commission. Adopted March 22, 2005.

Design Review process, which shall include an evaluation for airport land use compatibility pursuant to the ALUCP. Additionally, as detailed in Table 4.8.A, any development over 70 feet tall in Zone D will be subject to airspace review by the RCALUC, and highly noise-sensitive outdoor nonresidential uses are prohibited.[14] The residential density criteria for that portion of Zone D at Riverside Municipal Airport lying within the boundary of the City of Riverside is established to enable the density of future development to be similar to what now is common in the area. Additionally, schools, hospitals, and nursing homes are discouraged within Zone D. Any new buildings or changes in the use of existing buildings within Zone D shall also be evaluated for consistency with regard to intensity limitations. As detailed in Table 4.8.A, any development over 100 feet tall in Zone E will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.

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

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

[14] Table 2A, Chapter 2 Countywide Policies, Riverside County Airport Land Use Commission, October 2004.

THIS PAGE INTENTIONALLY LEFT BLANK

Table 4.8.A
Compatibility Criteria for Land Use Actions

		Maximum Densities / Intensities					Additional Criteria	
			Other Uses (people/acre)[2]					
Zone	Locations	Residential (d.u./ac)[1]	Average[6]	Single Acre[7]	With Bonus[8]	Required Open Land[3]	Prohibited Uses[4]	Other Development Conditions[5]
D	Primary Traffic Patterns and Runway Buffer Area	**(1)** ≤0.2 (average parcel size ≥5.0 ac.) or[9] **(2)** ≥5.0 (average parcel size ≤0.2 ac.)	100	300	390	10%	• Highly noise-sensitive outdoor nonresidential uses.[10] • Hazards to flight.[11]	• Airspace review required for objects >70 feet tall.[12] • Children's schools, hospitals, nursing homes discouraged.[13] • Deed notice required.
E	Other Airport Environs	No Limit	No Limit[14]			None	• Hazards to flight.[11]	• Airspace review required for objects >100 feet tall.[12] • Major spectator-oriented sports stadiums, amphitheaters, concert halls discouraged beneath principal flight tracks.[14]

d.u./ac = dwelling units per acre

[1]Residential development must not contain more than the indicated number of dwelling units (excluding secondary units) per gross acre. Clustering of units is encouraged. See Policy 4.2.5 for limitations. Gross acreage includes the property at issue plus a share of adjacent roads and any adjacent, permanently dedicated, open lands. Mixed-use development in which residential uses are proposed to be located in conjunction with nonresidential uses in the same or adjoining buildings on the same site shall be treated as nonresidential development.

[2]Usage intensity calculations shall include all people (e.g., employees, customers/visitors, etc.) who may be on the property at a single point in time, whether indoors or outside.

[3]Open land requirements are intended to be applied with respect to an entire zone. This is typically accomplished as part of a community general plan or a specific plan, but may also apply to large (10 acres or more) development projects.

[4]The uses listed here are ones that are explicitly prohibited regardless of whether they meet the intensity criteria. In addition to these explicitly prohibited uses, other uses will normally not be permitted in the respective compatibility zones because they do not meet the usage intensity criteria.

[5]As part of certain real estate transactions involving residential property within any compatibility zone (that is, anywhere within an airport influence area), information regarding airport proximity and the existence of aircraft overflights must be disclosed. This requirement is set by state law. Easement dedication and deed notice requirements indicated for specific compatibility zones apply only to new development and to reuse if discretionary approval is required.

[6] The total number of people permitted on a project site at any time, except rare special events, must not exceed the indicated usage intensity times the gross acreage of the site. Rare special events are ones (such as an air show at the airport) for which a facility is not designed and normally not used and for which extra safety precautions can be taken as appropriate.

[7] Clustering of nonresidential development is permitted. However, no single acre of a project site shall exceed the indicated number of people per acre.

[8] An intensity bonus may be allowed if the building design includes features intended to reduce risks to occupants in the event of an aircraft collision with the building.

Table 4.8.A
Compatibility Criteria for Land Use Actions

[9] Two options are provided for residential densities in Compatibility Zone D. Option (1) has a density limit of 0.2 dwelling units per acre (i.e., an average parcel size of at least 5.0 gross acres). Option (2) requires that the density be greater than 5.0 dwelling units per acre (i.e., an average parcel size less than 0.2 gross acres). The choice between these two options is at the discretion of the local land use jurisdiction. See Table 2B for explanation of rationale. All other criteria for Zone D apply to both options.

[10] Examples of highly noise-sensitive outdoor nonresidential uses that should be prohibited include amphitheaters and drive-in theaters. Caution should be exercised with respect to uses such as poultry farms and nature preserves.

[11] Hazards to flight include physical (e.g., tall objects), visual, and electronic forms of interference with the safety of aircraft operations. Land use development that may cause the attraction of birds to increase is also prohibited.

[12] This height criterion is for general guidance. Shorter objects normally will not be airspace obstructions unless situated at a ground elevation well above that of the airport. Taller objects may be acceptable if determined not be obstructions.

[13] Discouraged uses should generally not be permitted unless no feasible alternative is available.

[14] Although no explicit upper limit on usage intensity is defined for Zone E, land uses of the types listed—uses that attract very high concentrations of people in confined areas—are discouraged in locations below or near the principal arrival and departure flight tracks. This limitation notwithstanding, no use shall be prohibited in Zone E if its usage intensity is such that it would be permitted in Zone D.

Source: Table 2A, Chapter 2 Countywide Policies, Riverside County Airport Land Use Commission, October 2004.

Table 4.8.B
General Development Standards

Development Parameter	CBU Specific Plan Zone Subdistricts	
	CBU SP-1	CBU SP-2
Building/Structure Height - Maximum	99 feet (165 feet for non-habitable structures)	45 feet

Notes: RCALUC review is required for objects >70 feet tall in Zone D and >100 feet tall in Zone E.
Source: Table 4-2, *California Baptist University Specific Plan Amendment, Public Review Draft.* City of Riverside. August 2018.

Threshold F: For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

There are no private airstrips located within the City of Riverside.[15] Thus, the proposed Project will not result in a safety hazard for people residing or working in the Project area. Therefore, **no impact** will occur. No mitigation is required.

Threshold G: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

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

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

Threshold H: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

The proposed Project is located in an urbanized area where no wildlands exist, and the property is not located within a Fire Hazard Area or adjacent to areas subject to wildland fire hazards.[16] The CBUSP Amendment incorporates development standards designed to minimize risk of fire. The minimum distance between buildings shall be as required by the Fire Code. To combat fires, the CBUSP Amendment maintains minimum fire flow requirements depending on building usage. The fire flow requirement for academic buildings is a minimum 1,750 gallons per minute (gpm) at 20 pounds per square inch (psi). The requirement for multiple-unit residential buildings

[15] *Chapter 5.7-Hazards and Hazardous Materials. City of Riverside General Plan and Supporting Documents EIR.* Page 5.7-35. City of Riverside. November 2007.

[16] *Public Safety Element, General Plan 2025.* Figure PS-7. City of Riverside. 2007.

is 1,500 gpm at a minimum of 20 psi.[17] Fire flow calculations will be required during final design for each building to ensure adequate protection. In the absence of wildlands and/or Fire Hazard Areas in proximity to the Project area, **no impact** regarding wildland fires from this Project will occur. No mitigation is required.

4.8.6 Mitigation Measures

Section 15126.4 of the CEQA Guidelines requires EIRs to describe feasible measures that will reduce significant adverse impacts. The following mitigation measures have been evaluated for feasibility and are incorporated to reduce potentially significant impacts related to the potential of creating a significant hazard to the public or the environment during implementation and operation of the CBUSP Amendment.

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

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

MM HAZ-3: Prior to issuance of building permits for any new structure or remodeling that would increase the height of any existing structure, CBU (or its successor-in-interest, if applicable) shall submit documentation verifying that the structure's elevation above mean sea level (at top point, including all roof-mounted

[17] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 3 Section D, Subsection 3. City of Riverside. August 2018.

equipment and lighting, if applicable): (1) will not exceed the elevation of Runway 16-32 at its southerly terminus (747.5 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway; and, (2) will not exceed the elevation of Runway 9-27 at its easterly terminus (815 feet above mean sea level) by more than one foot for every 100 feet of distance from the structure to that runway. If both of these requirements cannot be met for any given structure, the applicant shall file Form 7460-1 with the Federal Aviation Administration, and no building permit shall be issued until a "Determination of No Hazard to Air Navigation" is received from the Federal Aviation Administration and filed with the City of Riverside Planning Division, the City of Riverside Building and Safety Division, the Riverside County Airport Land Use Commission, and manager of Riverside Municipal Airport.

4.8.7 Environmental Impacts After Mitigation Is Incorporated

With incorporation of Project Design Features, compliance with federal, state, and local regulations, and implementation of mitigation measures **MM HAZ-1, MM HAZ-2**, and **MM HAZ-3,** potential Project-specific impacts will be **less than significant**.

4.8.8 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

California Baptist University, Department of Environmental Health and Safety. *Hazardous Material & Hazardous Waste Maintenance Program*. 2018, as amended.

California Department of Toxic Substances Control. DTSC's Hazardous Waste and Substances Site List – Site Cleanup (Cortese List). 2018. http://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,OPEN,FUDS,CLOSE&status=ACT,BKLG,COM,COLUR&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+(CORTESE). (Accessed February 27, 2018.).

California Department of Toxic Substances Control. *Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers.* June 9, 2006.

California Department of Toxic Substances Control. *Interim Guidance for Sampling Agricultural Soils (Third Revision).August 2008.*

City of Riverside. *California Baptist University Specific Plan Amendment, Public Review Draft.* August 2018.

City of Riverside. *City of Riverside General Plan 2025.* November 2007.

City of Riverside. *City of Riverside General Plan 2025 and Supporting Documents Final Program Environmental Impact Report.* November 2007.

County of Riverside. *Riverside County Airport Land Use Compatibility Plan Policy Document*. Adopted by Riverside County Airport Land Use Commission. Adopted March 22, 2005.

County of Riverside, Airport Land Use Commission. *Chapter 2 Countywide Policies*. October 2004.

County of Riverside, Airport Land Use Commission. *Current Compatibility Plans.* http://www.rcaluc.org/Plans/New-Compatibility-Plan. (Accessed February 27, 2018).

Nationwide Environmental Title Research, LLC. 1969 and 1975 USGS 7.5' Topographic Maps (Riverside West, CA Quadrangle, T3S, R5W, Sections 5 and 8, San Bernardino Base Meridian) www.historicaerials.com. (Accessed August 15, 2017).

4.9 HYDROLOGY AND WATER QUALITY

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential impacts to hydrology and water quality with implementation of the proposed Project. No comments regarding hydrology and water quality were received in response to the NOP.

4.9.1 Setting

Existing Conditions

Surface Water. The CBU Specific Plan Zone is within the Arlington and Riverside south waterbasin of the Middle Santa Ana River Watershed.[1] The Santa Ana River Watershed, which is comprised of the upper, middle, and lower watersheds, is approximately 3,000 square miles (sq mi), with more than 50 contributing tributaries.[2] The watershed area is home to more than 4.5 million people. The Middle Santa Ana River Watershed covers approximately 488 sq mi and lies largely in the southwestern corner of San Bernardino County and the northwestern corner of Riverside County. A small part of Los Angeles County in the Pomona, Diamond Bar, Whittier, La Mirada, and Santa Fe Springs areas also lies within the watershed. [3]

The Santa Ana River extends about 96 miles (mi) from its headwaters to where it drains into the Pacific Ocean. The headwaters for the Santa Ana River and its tributaries are in the San Gabriel and San Bernardino Mountains to the north and the San Gorgonio and San Jacinto Mountains to the east. From the San Bernardino and San Gabriel Mountains, the Santa Ana River flows through the Santa Ana Valley, then through the Prado Basin and a narrow pass in the Santa Ana Mountains. From the Santa Ana Mountains, the Santa Ana River flows southwest to the Pacific Ocean.

For planning purposes, the Santa Ana Regional Water Quality Control Board (RWQCB) uses a watershed classification system that divides surface waters into hydrologic units (HUs), hydrologic areas (HAs), and hydrologic subareas (HSAs). As designated by the RWQCB, the

1 Figure PF 1.1, Waterbasins Groundwater Recharge Areas, Public Facilities and Infrastructure Element, City of Riverside 2025 General Plan, Amended November 2012.
2 Santa Ana Watershed Association. http://sawatershed.org/?q=sarwatershed, (Accessed August 16, 2017).
3 Santa Ana Regional Water Quality Control Board. 2005. Staff Report on Bacterial Indicator Total Maximum Daily Loads in the Middle Santa Ana River Watershed.

Project site is located within the Santa Ana River HU, the Middle Santa Ana River HA Split, and the Arlington HSA.[4]

Storm Drains. The following three mainline drainage facilities serve the CBU original campus core (all CBU properties generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street less two privately owned properties along Diana Avenue plus the Health Sciences Campus):

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

The Monroe Storm Drain Stage I Line begins approximately 400 feet south of Indiana Avenue. In the vicinity of the CBU Specific Plan Zone, this system ranges from a 60- to 63-inch reinforced concrete pipe in Monroe Street before upsizing to an eight-foot by three-foot concrete box culvert at Magnolia Avenue. This system ultimately drains northwesterly to the Monroe Street Channel and ultimately the Santa Ana River (Reach 3, Prado Dam to Mission Street).

University-owned storm drain facilities on the campus range in size from 6 to 42 inches. These storm drains convey storm water from the central portion of the campus core to an existing detention basin (i.e., Magnolia Basin), located on the campus adjacent to Magnolia Avenue to the west of the main campus entrance. The storm drain lines that convey runoff from the campus to this basin range from 10 to 42 inches in diameter. From the basin, the storm water flows into the existing 30-inch storm drain in Magnolia Avenue to the existing Monroe Storm Drain Stage I Line. Currently, the CBU Campus generates a total of 70.70 cubic feet per second (cfs) in the 10-year storm event and 121.58 cfs in the 100-year storm event routed to the existing onsite Magnolia Basin.

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

[4] Santa Ana Regional Water Quality Control Board. 1995, updated June 2011. Water Quality Control Plan for the Santa Ana River Basin. http://waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (Accessed August 17, 2017).

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

Surface Water Quality. The most serious regional water quality issue in the Santa Ana River Watershed is the degradation of water quality by nitrogen and total dissolved solids (TDS). Historically, the Santa Ana River and its major tributaries flowed year-round; however, diversion for irrigation has resulted in decreased flow and groundwater recharge. Primary water quality concerns in the Middle Santa Ana River Basin include buildup of dissolved minerals (salts), TDS, and nitrate.[5] As discussed later in the Related Regulations section, Reach 3 of the Santa Ana River is impaired for copper, lead, and pathogens.

Groundwater. The CBU Specific Plan Zone is located within the Riverside-Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. The Riverside-Arlington Subbasin is a 92 square mile basin underlying part of the Santa Ana River Valley in northwest Riverside County and southwest San Bernardino County. This subbasin is bound by impermeable rocks of Box Springs Mountains on the southeast, Arlington Mountain on the south, La Sierra Heights and Mount Rubidoux on the northwest, and the Jurupa Mountains on the north. The northeast boundary is formed by the Rialto-Colton fault and a portion of the northern boundary is formed by a groundwater divide beneath the City of Bloomington. Groundwater in the subbasin is replenished by infiltration from Santa Ana River flow, return irrigation flow, and deep percolation of precipitation.[6]

For regulatory purposes, the Santa Ana Regional Water Quality Control Board (RWQCB) designates Groundwater Management Zones. The CBU Specific Plan Zone is within the Arlington Groundwater Management Zone of the Middle Santa Ana River Basin. The Arlington Groundwater Management Zone is bound by impermeable rocks of the El Sobrante de San Jacinto Mountains on the south and the La Sierra Hills on the west and northwest. This Groundwater Management Zone is bound by the Riverside-D Groundwater Management Zone on the east and the Chino 5 Groundwater Management Zone on the north.[7]

---

5 Santa Ana Regional Water Quality Control Board. *Watershed Management Initiative Chapter*. November 2004.

6 California Department of Water Resources. 2004. *California's Groundwater, Bulletin 118 Update*.

7 Figure 3-5a, Santa Ana Regional Water Quality Control Board. *Water Quality Control Plan for the Santa Ana River Basin*. 1995 (updated June 2011). http://waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (Accessed August 17, 2017).

Groundwater Quality. Water in the Riverside-Arlington Subbasin is primarily sodium-calcium bicarbonate based. Total dissolved solids within the subbasin ranges from 320 to 756 mg/L.[8]

Floodplain/Inundation Zones. According to the Federal Emergency Management Agency (FEMA) Federal Insurance Rate Map (FIRM) (No. 06065C0720G, August 28, 2008), the CBU Specific Plan Zone is mapped within Zone X, which is defined as the area determined to be outside the 0.2 percent annual change floodplain (500-year floodplain).

The California Department of Water Resources (DWR) also publishes Awareness Floodplain Maps, which identify all pertinent flood hazard areas for areas that are not mapped by FEMA. The intent of the Awareness Floodplain Maps is to provide the community and residents an additional tool in understanding potential flood hazards currently not mapped as regulated floodplains. According to the Awareness Floodplain Mapping for the Riverside West Quadrangle, the CBU Specific Plan Zone is not located within any DWR Awareness Floodplains.

The CBU Specific Plan Zone is approximately 35 miles from the Pacific Ocean. According to the Tsunami Inundation Map for Emergency Planning (California Emergency Management Agency, California Geological Survey, and University of Southern California), the CBU Specific Plan Zone is not within a tsunami inundation zone.

According to Figure PS-4 of the Public Safety Element of the City's *General Plan 2025*, the CBU Specific Plan Zone is located within the inundation zones of the Prenda Dam and the Woodcrest Dam.[9]

4.9.2 Related Regulations

Federal Regulations

Clean Water Act. In 1972, the Federal Water Pollution Control Act (later referred to as the Clean Water Act [CWA]) was amended to require that the discharge of pollutants into waters of the United States from any point source be effectively prohibited unless the discharge is in compliance with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, the CWA was again amended to require that the United States Environmental Protection Agency (USEPA) establish regulations for the permitting of storm water discharges (as a point source) by municipal and industrial facilities and construction activities under the NPDES permit program.

[8] California Department of Water Resources. 2003. *California's Groundwater, Bulletin 118 Update*.

[9] Public Safety Element. City of Riverside 2025 General Plan. Figure PS-4. November 2007, Amended November 2012.

The regulations require that Municipal Separate Storm Sewer System (MS4) discharges to surface waters be regulated by an NPDES permit.

The CWA requires states to adopt water quality standards for water bodies and have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents—such as lead, suspended sediment, and fecal coliform bacteria—or narrative statements that represent the quality of water that support a particular use. Because California had not established a complete list of acceptable water quality criteria for toxic pollutants, the USEPA Region IX established numeric water quality criteria for toxic constituents in the form of the California Toxics Rule (CTR).

When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, nonpoint, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

State Regulations

California Porter-Cologne Act. The federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources within the states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act). The Porter-Cologne Act grants the State Water Resources Control Board (SWRCB) and the RWQCB broad powers to protect water quality and is the primary vehicle for implementation of California's responsibility under the federal CWA. The Porter-Cologne Act grants the SWRCB and RWQCB the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

Each RWQCB must formulate and adopt a water quality plan for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and established by the SWRCB in its State water policy. The Porter-Cologne Act also provides that a RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste.

Sana Ana River Basin Water Quality Control Plan (Basin Plan). The Santa Ana RWQCB has adopted a Water Quality Control Plan (Basin Plan) for its region of responsibility, which includes the City of Riverside (City). The RWQCB has delineated water resource area boundaries based on hydrological features. For purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

Beneficial uses of water are defined in the Basin Plan as those necessary for the survival or well-being of humans, plants, and wildlife. The existing beneficial uses for the San Ana River (Reach 3), as designated by the RWQCB in the Basin Plan, are listed below.

- **Agricultural Supply (AGR):** Uses of water for farming, horticulture, or ranching, including, but not limited to, irrigation, stock watering, and support of vegetation for range grazing.
- **Groundwater Recharge (GWR):** Uses of water for natural or artificial recharge of groundwater for purposes that may include, but are not limited to, future extraction, maintaining water quality or halting saltwater intrusion into freshwater aquifers.
- **Water Contact Recreation (REC1):** Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, waterskiing, skin and SCUBA diving, surfing, white-water activities, fishing, and use of natural hot springs.
- **Noncontact Water Recreation (REC2):** Uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, and aesthetic enjoyment in conjunction with the above activities.

- **Warm Freshwater Habitat (WARM):** Uses of water that support warm-water ecosystems, including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- **Wildlife Habitat (WILD):** Uses of water that support wildlife habitats, including, but not limited to, preservation and enhancement of vegetation and prey species used by waterfowl or other wildlife.
- **Rare, Threatened, or Endangered Species (RARE):** Uses of water that support habitats necessary for the survival and successful maintenance of plant or animal species established under State or federal law as rare, threatened, or endangered.
- **Spawning, Reproduction and Development (SPWN):** Use of waters that support high quality aquatic habitats necessary for reproduction and early development of fish and wildlife.

The Santa Ana River (Reach 3) is listed as exempt from Municipal and Domestic Supply (MUN) beneficial use (use of water for community, military, or individual water supply systems, including, but not limited to, drinking water supply).

The existing beneficial uses for groundwater for the Arlington HSA are:

- **Municipal and Domestic Supply (MUN)**: Use of water for community, military, or individual water supply systems, including, but not limited to, drinking water supply).
- **Agricultural Supply (AGR):** Uses of water for farming, horticulture, or ranching, including, but not limited to, irrigation, stock watering, and support of vegetation for range grazing.
- **Industrial Service Supply (IND):** Use of water for industrial activities that do not depend primarily on water quality. These uses may include, but are not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection and oil well repressurization.
- **Industrial Process Supply (PROC)**: Use of water for industrial activities that depend primarily on water quality. These uses may include, but are not limited to, process water supply and all uses of water related to product manufacture or food preparation.

The Basin Plan has established narrative and numeric water quality objectives for inland surface streams, which include the Santa Ana River. If water quality objectives are exceeded, the RWQCB can use its regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters. Relevant surface water quality objectives for the CBU Specific Plan Zone are shown in Table 4.9.A. Relevant groundwater quality objectives for the CBU Specific Plan Zone are shown in Table 4.9.B.

Table 4.9.A
Surface Water Quality Objectives

Constituent	Concentration	Receiving Waters
Algae	Waste discharges shall not contribute to excessive algal growth in inland surface receiving waters.	All inland surface waters
Ammonia	Varies based on pH and temperature. Ranges from 0.0006–0.0530 mg/L unionized ammonia and 0.119–2.27 mg/L total ammonia. To prevent chronic toxicity to aquatic life in the Santa Ana River Reach 3, discharges to these waterbodies shall not cause the concentration of un-ionized ammonia (as nitrogen) to exceed 0.098 mg/L) (NH3-N) as a 4-day average.	WARM beneficial use designation
Boron	Shall not exceed 0.75 mg/L as a result of controllable water quality factors.	All inland surface waters
Chlorine (residual)	Chlorine residual in wastewater discharged to inland surface waters shall not exceed 0.1 mg/L.	All inland surface waters
Coliform (fecal)	Logarithm means less than 200 organisms per 100 mL based on five or more samples per 30-day period and not more than 10 percent of the samples exceed 400 organisms per 100 mL for any 30-day period.	REC-1 beneficial use designation
	Logarithm means less than 2,000 organisms per 100 mL based on five or more samples per 30-day period and not more than 10 percent of the samples exceed 4,000 organisms per 100 mL for any 30-day period.	REC-2 beneficial use designation
Color	Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses. The natural color of fish, shellfish or other inland surface water resources used for human consumption shall not be impaired.	All inland surface waters
Floatables	Waste discharges shall not contain floating materials, including solids, liquids, foam, or scum, that cause a nuisance or adversely affect beneficial uses.	All inland surface waters
Metals	Varies based on hardness.	All inland surface waters
Oil and grease	Waste discharges shall not result in deposition of oil, grease, wax, or other materials in concentrations that result in a visible film or in coating objects in the water or that cause a nuisance or adversely affect beneficial uses.	All inland surface waters
Oxygen (dissolved)	Shall not be depressed below 5 mg/L as a result of controllable water quality factors.	WARM beneficial use designation
	Waste discharges shall not cause the median dissolved oxygen concentration to fall below 85 percent of saturation or the 95th percentile concentration or fall below 75 percent of saturation within a 30-day period.	All inland surface waters
pH	Shall not be raised above 8.5 or depressed below 6.5 as a result of controllable water quality factors.	All inland surface waters
Radioactivity	Shall not exceed the California Code of Regulations, Title 22, standards of 5 pCi/L for combined radium-226 and radium-228, 15 pCi/L for gross alpha, 20,000 pCi/L for tritium, 8 pCi/L for strontium-90, 50 pCi/L for gross beta, and 20 pCi/L for uranium.	MUN beneficial use designation

Table 4.9.A
Surface Water Quality Objectives

Constituent	Concentration	Receiving Waters
Solids (suspended and settleable)	Shall not cause nuisance or adversely affect beneficial uses.	All inland surface waters
Sulfides	Shall not be increased as a result of controllable water quality factors.	All inland surface waters
Surfactants	Waste discharges shall not contain concentrations of surfactants that result in foam in the course of flow or use of the receiving water or that adversely affect aquatic life.	All inland surface waters
Taste and odor	Shall not contain taste- or odor-producing substances at concentrations that cause a nuisance or adversely affect beneficial uses.	All inland surface waters
Temperature	Shall not be raised above 90°F June through October or above 78°F during the rest of the year as a result of controllable water quality factors.	WARM beneficial use designation
Toxic substances	Shall not be discharged at levels that will bioaccumulate in aquatic resources to levels that are harmful to human health. Concentrations of toxic pollutants in the water column, sediments, or biota shall not adversely affect beneficial uses.	All inland surface waters
Turbidity	Where natural turbidity is between 0 and 50 NTU, increases shall not exceed 20 percent. Where natural turbidity is between 50 and 100 JTU, increases shall not exceed 10 NTU. Where natural turbidity is greater than 100 NTU, increases shall not exceed 10 percent.	All inland surface waters

Source: *Water Quality Control Plan for the Santa Ana River Basin* (SARWQCB 1995, updated February 2008 and June 2011).

°F = degrees Fahrenheit
Basin Plan = *Water Quality Control Plan for the Santa Ana River Basin*
COLD = Cold Freshwater Habitat
JTU = Jackson Turbidity Units
mg/L = milligrams per liter
mL = milliliters
MUN = Municipal Supply
N = nitrogen
NO_3 = nitrate
NTU = Nephelometric Turbidity Units
pCi/L = picocuries per liter
pH = percentage of hydrogen
REC-1 = Contact Water Recreation
REC-2 = Noncontact Water Recreation
WARM = Warm Freshwater Habitat

Table 4.9.B
Groundwater Quality Objectives

Constituent	Concentration	Area
Arsenic	Shall not exceed 0.05 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Boron	Shall not exceed 0.75 mg/L as a result of controllable water quality factors.	Santa Ana Region
Chloride	Shall not exceed 500 mg/L as a result of controllable factors.	MUN beneficial use designation
Coliform (total)	Shall not exceed 2.2 organisms/100 mL median over any 7-day period as a result of controllable water quality factors.	MUN beneficial use designation

Table 4.9.B
Groundwater Quality Objectives

Constituent	Concentration	Area
Color	Waste discharges shall not result in coloration of the receiving waters that causes a nuisance or adversely affects beneficial uses.	Santa Ana Region
Cyanide	Shall not exceed 0.2 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Fluoride	Shall not exceed 1.0 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Hardness	Shall not be increased as a result of waste discharges to levels that adversely affect beneficial uses.	MUN beneficial use designation
Oil and grease	Waste discharges shall not result in deposition of oil, grease, wax, or other materials in concentrations that cause a nuisance or adversely affect beneficial uses.	Santa Ana Region
Barium	Shall not exceed 1.0 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Cadmium	Shall not exceed 0.01 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Chromium	Shall not exceed 0.05 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Cobalt	Shall not exceed 0.2 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Copper	Shall not exceed 1.0 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Iron	Shall not exceed 0.3 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Lead	Shall not exceed 0.05 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Manganese	Shall not exceed 0.05 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Mercury	Shall not exceed 0.002 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Selenium	Shall not exceed 0.01 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Silver	Shall not exceed 0.05 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Methylene blue-activated substances	Shall not exceed 0.05 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
pH	Shall not be raised above 9 or depressed below 6 as a result of controllable water quality factors.	Santa Ana Region
Radioactivity	Shall not exceed the California Code of Regulations, Title 22, standards of 5 pCi/L for combined radium-226 and radium-228, 15 pCi/L for gross alpha, 20,000 pCi/L for tritium, 8 pCi/L for strontium-90, 50 pCi/L for gross beta, and 20 pCi/L for uranium.	MUN beneficial use designation

Table 4.9.B
Groundwater Quality Objectives

Constituent	Concentration	Area
Sodium	Shall not exceed a sodium absorption rate of 9.	AGR beneficial use designation
Sulfate	Shall not exceed 500 mg/L as a result of controllable water quality factors.	MUN beneficial use designation
Taste and odor	Shall not contain taste- or odor-producing substances in concentrations that adversely affect beneficial uses.	Santa Ana Region
Toxic substances	All waters shall be maintained free of substances in concentrations that are toxic or that produce detrimental physiological responses in human, plant, animal, or aquatic life.	Santa Ana Region

Source: *Water Quality Control Plan for the Santa Ana River Basin* (SARWQCB 1995, updated February 2008 and June 2011).

AGR = Agricultural Supply
mg/L = milligrams per liter
mL = milliliter
MUN = Municipal Supply
pCi/L = picocuries per liter
pH = percentage of hydrogen

In addition to the surface water objectives listed in Table 4.9.A, the following site-specific water quality objectives are designated in the Basin Plan for Reach 3 of the Santa Ana River:

- Total Dissolved Solids = 700 mg/L
- Hardness = 350 mg/L
- Sodium = 110 mg/L
- Chloride = 140 mg/L
- Total Inorganic Nitrogen = 10 mg/L
- Sulfate = 150 mg/L

Chemical Oxygen Demand = 30 mg/L The following site-specific groundwater objectives are designated in the Basin Plan for the Arlington HSA.

- Total Dissolved Solids = 980 mg/L and Nitrate as Nitrogen = 10 mg/L

California Toxics Rule. The CTR provides water quality criteria for certain potentially toxic compounds for inland surface waters, enclosed bays, estuaries, and waters designated with human health or aquatic life uses. Although the CTR criteria do not apply directly to the discharges of storm water runoff, the criteria are utilized as benchmarks for toxics in urban runoff. The CTR and other water quality criteria and targets are used as benchmarks to evaluate the potential ecological impacts of storm water runoff to receiving waters. The CTR establishes acute and chronic surface water quality standards for certain water bodies. Acute criteria provide benchmarks for the highest permissible concentration below which aquatic life can be exposed for short periods of time without deleterious effects. Chronic criteria provide benchmarks for an

extended period of time (i.e., for 4 days or more) without deleterious effects. The acute CTR criteria have a shorter relevant averaging period (less than 4 days) and provide a more appropriate benchmark for comparison for storm water flows.

CTR criteria are applicable to the receiving water body and therefore must be calculated based on the probable hardness values of the receiving waters. At higher hardness values for receiving waters, certain constituents, including copper, lead, and zinc, are more likely to be complexed (bound with) components in the water column. This in turn reduces the bioavailability and resulting potential toxicity of these metals.

Clean Water Act, Section 303, List of Impaired Water Bodies. The SWRCB approved the 2012 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report on April 8, 2015. On July 30, 2015, the EPA approved the 2012 California 303(d) List of Water Quality Limited Segments. The Santa Ana River, Reach 3, is listed as impaired for copper lead and pathogens.

TMDL Requirements. A resolution to amend the Basin Plan to include a TMDL for bacterial indicators was approved by the Santa Ana RWQCB on September 1, 2006, and the EPA on May 16, 2007 (Resolution No. R8-2005-001). This TMDL is applicable to Reach 3 of the Santa Ana River. In addition, a TMDL is currently under development for nitrate for the Santa Ana River, Reach 3.

Clean Water Act, Section 402, National Pollutant Discharge Elimination System. Direct discharges of pollutants into waters of the United States are not allowed except in accordance with the NPDES program established in Section 402 of the CWA.

Construction General Permit. The *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities*, Order No. 2009-0009-DWQ, NPDES No. CAS000002, as amended by Order Nos. 2010-0014-DWQ and 2012-0006-DWQ (Construction General Permit), adopted by the SWRCB, regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least 1 acre (ac) of total land area. The Construction General Permit authorizes the discharge of storm water to surface waters from construction activities.

The Construction General Permit requires that all developers of land where construction activities will occur over more than 1 ac do the following:

- Complete a Risk Assessment to determine pollution prevention requirements pursuant to the three Risk Levels established in the General Permit;

- Eliminate or reduce non-storm water discharges to storm sewer systems and other waters of the nation;
- Develop and implement a Storm Water Pollution Prevention Plan (SWPPP) that specifies Best Management Practices (BMPs) that will reduce pollution in storm water discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and
- Perform inspections and maintenance of all BMPs.

In order to obtain coverage under the Construction General Permit, a project applicant must electronically file all Permit Registration Documents with the SWRCB prior to the start of construction. Permit Registration Documents must include:

- Notice of Intent
- Risk Assessment
- Site Map
- SWPPP
- Annual Fee
- Signed Certification Statement

Typical BMPs contained in SWPPPs are designed to minimize erosion during construction, stabilize construction areas, control sediment, control pollutants from construction materials, and address post-construction runoff quantity (volume) and quality (treatment). The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

Local Regulations

Riverside General Plan 2025. The following objectives and policies pertaining to hydrology and water quality are drawn from the City's *General Plan 2025* and are applicable to the proposed Project. Although listed here, each of these objectives and policies are presented in Table 4.10-1 of the Land Use and Planning Section of the EIR with an evaluation of the Project's consistency with the stated objectives and policies.

Public Safety Objectives and Policies

Objective PS-2	Reduce potential flood hazards within Riverside.
Policy PS-2.1	Reduce flood risks for residents and businesses within urbanized areas, as feasible.

Policy PS-2.2	Encourage flood control infrastructure that does not reduce the natural character or limit the use of the site.
Policy PS-2.3	Minimize additional flood risk exposure in developing areas.
Policy PS-2.6	Create and maintain evacuation routes for areas that could be affected by flooding or dam failure, with special emphasis on critical and emergency facilities.
Objective PS-9	Minimize the effects from natural and urban disasters by providing adequate levels of emergency response services to all residents in Riverside.
Policy PS-9.8	Reduce the risk to the community from hazards related to geologic conditions, seismic activity, flooding and structural and wildland fires by requiring feasible mitigation of such impacts on discretionary development projects.
Objective PS-10	Improve the community's ability to respond effectively to emergencies.
Policy PS-10.4	Continue to ensure that each development or neighborhood in the City has adequate emergency ingress and egress, and review neighborhood access needs to solve problems, if possible.
Policy PS-10.5	Coordinate with local agencies and organizations to educate all residents and businesses to take appropriate action to safeguard life and property during and immediately after emergencies.

Open Space and Conservation Objectives and Policies

Objective OS-10	Preserve the quantity and quality of all water resources throughout Riverside.
Policy OS-10.2	Coordinate plans, regulations and programs with those of other public and private entities which affect the consumption and quality of water resources within Riverside.
Policy OS-10.6	Continue to enforce RWQCB regulations regarding urban runoff.
Policy OS-10.7	Work with the RWQCB in the establishment and enforcement of urban runoff water quality standards.

Policy OS-10.8	Cooperate with Riverside and San Bernardino Counties and adjacent jurisdictions in the review and approval of new developments which affect the quality and quantity of basin-wide groundwater and surface water resources.
Policy OS-10.9	Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in storm water runoff and provide groundwater percolation zones.
Policy OS-10.10	Protect aquifer recharge features and areas of important aquifers from degradation of water quality and reduction of recharge.

Public Facilities and Infrastructure Objectives and Policies

Objective PF-4	Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows.
Policy PF-4.1	Continue to fund and undertake storm drain improvement projects as identified in the City of Riverside Capital Improvement Plan.
Policy PF-4.2	Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.
Policy PF-4.3	Continue to routinely monitor and evaluate the effectiveness of the storm drain system and make adjustments as needed.

Municipal Code. Title 6 of the City of Riverside Municipal Code (RMC) regulates water and other wells within the City. Chapter 6.28 of the RMC provides minimum standards for construction, reconstruction, abandonment and destruction of all wells in order to (a) protect underground water resources; and (b) provide safe water to persons within the City of Riverside.

Title 17 of the RMC regulates grading and excavation activities. Chapter 17.16 of the RMC requires applications for grading permits to include an interim erosion control plan. In addition, this chapter requires compliance with the Construction General Permit and preparation of a SWPPP for projects that would disturb greater than 1 ac of soil. This chapter also requires the applicant to provide documentation of post-construction BMPs in compliance with the Riverside County DAMP.

City of Riverside Green Action Plan

In July 2005, the City assembled a Clean and Green Task Force that developed guidelines for a cleaner, greener, and more sustainable city. Its sustainability policy statement highlighted the following categories: save water, keep it clean, make it solar, make it shady, clean the air, save fuel, make it smart, and build green. The task force created a 38-point Clean and Green Sustainable Riverside Action Plan (Green Action Plan) to transform the policy statement into an implementation plan. The following goals of the City's Green Action Plan regard hydrology and water quality:[10]

Goal 16	Reduce per capita water usage 20% citywide by 2020.
Goal 17	Increase the use of recycled water by 30% by 2020, based on the 2008 baseline.

Groundwater Discharge Permit. On June 19, 2015, the Santa Ana RWQCB adopted the General Waste Discharge Requirements for Discharges to Surface Waters that Pose an Insignificant (De Minimus) Threat to Water Quality, Order No. R8-2015-0004, NPDES No. CAG998001 (Groundwater Discharge Permit). This permit became effective on July 1, 2015. This permit regulates discharge of groundwater and non-storm water construction dewatering waste to surface waters (including estuarine and ocean waters) that pose an insignificant threat to water quality in the Santa Ana Region. Under this permit, discharges must comply with discharge specifications, receiving water and groundwater limitations, and monitoring and reporting requirements detailed in the permit.

Municipal NPDES Permit. The City is a co-permittee under the *National Pollutant Discharge Elimination System (NPDES) Permit for Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County with the Santa Ana Region* (Order No. R8-2010-003, NPDES No. CAS618033). The NPDES permit prohibits discharges, sets limits on pollutants being discharged into receiving waters, and requires implementation of technology-based standards.

Under the NPDES permit, the co-permittees are responsible for the management of storm drain systems within their jurisdiction. The co-permittees are required to implement management programs, monitoring programs, implementation plans, and all BMPs outlined in the Drainage

[10] *Green Action Plan, 2012.* Page 32. City of Riverside. http://www.greenriverside.com/about-green-riverside/green-action-plan. (Accessed September 5, 2017).

Area Management Plan (DAMP) and to take any other actions that may be necessary to protect water quality to the maximum extent practicable.

4.9.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed project could have a significant impact on hydrology and water quality if it would:

- (Threshold A) Violate any water quality standards or waste discharge requirements;
- (Threshold B) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted);
- (Threshold C) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site;
- (Threshold D) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;
- (Threshold E) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff;
- (Threshold F) Otherwise substantially degrade water quality;
- (Threshold G) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- (Threshold H) Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- (Threshold I) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or
- (Threshold J) Result in inundation by seiche, tsunami, or mudflow.

Methodology

Project impacts to hydrology and water quality were evaluated based on the proposed Project's adherence to local, State, and federal standards; proposed land use; design; and proposed BMPs for control of surface runoff and reduction of pollutants in runoff.

4.9.4 Project Design Features

To reduce flows to the regional storm drain system and capture drainage for beneficial reuse, design features will be integrated in all new campus development to promote infiltration and provide for water quality treatment. These improvements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

In accordance with the CBUSP Amendment, the existing detention basin will continue to accept, retain and treat runoff from existing and future on site development and allow for some infiltration into the local groundwater aquifer.[11] The detention basin outlet will continue to detain the storm water runoff to keep outflow to at or below existing storm flows. The detention basin outlet will maintain its existing connection to the 30-inch storm drain in Magnolia Avenue, and will drain to the existing Monroe Street Channel.

All future storm water flows will be connected to the existing CBU private underground storm drain system and ultimately conveyed to the Magnolia Basin. As new development on the campus occurs, localized storm drains will be constructed and connected to existing storm drain systems that flow to the detention basin. Existing drainage patterns will be maintained throughout the campus to reduce the potential of diversion of flows. The existing 30-inch storm drain along Lancer Lane/Briarwood Drive will be extended to provide drainage facilities for the realigned primary vehicular roadway.

Subsequent development projects or improvements within the CBU Specific Plan Zone would be required to prepare a Water Quality Management Plan (WQMP) and implement site design, source control, Low Impact Development (LID) and treatment Best Management Practices (BMPs) to treat pollutants of concern in stormwater runoff. The CBUSP Amendment specifies that "where infiltration or reuse (for irrigation or sewage conveyance) is not feasible due to natural conditions (e.g., unsuitable geotechnical conditions), stormwater shall be treated to remove a minimum of 80 percent of total suspended solids prior to release in existing storm drain

[11] *California Baptist University Specific Plan, Public Review Draft.* Chapter 8: Implementation, Section L. Implementation Methods, Subsection 1. Utilities and Maintenance, c. Storm Drain, 1) and 2). City of Riverside. August 2018.

systems, or as may be required to meet National Pollution Discharge Elimination System (NPDES) requirements. Treatment systems to be considered include, but are not limited to bio-swales, bio-retention cells, rain gardens, native mixed grasses, pervious paving systems, packaged storm treatment units, and storm water infiltration systems."[12]

The selection of BMPs is based on the pollution risks associated with the specific construction activity. Pollution prevention goal is based on a review of information gathered during the assessment of the site and planned activities. There are six BMP categories and are as follows and are described below:

- Erosion Control (EC)
- Sediment Control (SC)
- Wind Erosion Control (WC)
- Tracking Control (TC)
- Non-Stormwater Management (NS) or Good Housekeeping Practices
- Waste Management and Materials Pollution Control (WM) or Good Housekeeping Practices[13]

Erosion Control. Erosion control is any source control that protects and prevents soil particles from detaching by rainfall, flowing water, or wind. Erosion control BMPs that can be used to fulfill these objectives for new construction within the CBU Specific Plan Zone include: scheduling; preservation of existing vegetation; hydraulic mulch; hydroseeding; soil binders; straw mulch; geotextiles and mats; wood mulching; earth dikes and drainage swales; velocity dissipation devices; slope drains; streambank stabilization; reserved; compost blankets; soil preparation/roughening; and non-vegetative stabilization. All inactive and some active soil areas must be protect from erosion prior to the onset of rain, which include steep and flat terrain. Some BMPs are considered dual-purposed, including fiber rolls and check dams, which can be implemented for erosion control as well as sediment control.

Sediment Control. Sediment control is any practice that traps soil once it has been detached and moved by rain, flowing water, or wind. These control measures are usually passive systems that rely on filtering or settling the particles out of the water or wind that is transporting them. Sediment control BMPs which can possibly be implemented into new development within the CBU Specific Plan Zone include: silt fencing; sediment basin; sediment trap; check dam; fiber

[12] *California Baptist University Specific Plan, Public Review Draft*. Chapter 7: Design Guidelines, Section K, Subsection 1, City of Riverside August 2018.

[13] California Stormwater Quality Association (CASQA), BMP Handbook, 2.3.2 Identify BMP Categories, August 2011.

rolls; gravel bag berm; street sweeping and vacuuming; sandbag barrier; straw bale barrier; storm drain inlet protection; active treatment systems; manufactured linear sediment controls; compost socks and berms; and biofilter bags. Sediment control BMPs are most effective when they work in conjunction with erosion control BMPs.

Wind Erosion Control. Wind erosion control consists of applying water or other dust palliative to prevent or minimize dust nuisance. Additionally, BMPs from erosion control help reduce wind erosion, including scheduling, preservation of existing vegetation, mulching, soil binders, compost blankets, soil preparation/roughening, and non-vegetative stabilization.

Tracking Control. Tracking control consists of preventing and reducing the tracking of sediment off-site by vehicles leaving the construction site. These BMP control measures include: stabilized construction entrance/exit; stabilized construction roadway; and entrance/outlet tire wash.

Non-Stormwater Management and Material Management. Non-stormwater management and material management BMPs, also referred as “good housekeeping practices" prevent pollution by limiting or reducing potential pollutants at their source or eliminating off-site discharge. Non-stormwater management BMPs include: water conservation practices; dewatering operations; clear water diversion; illicit connection/discharge; potable water/irrigation; vehicle and equipment cleaning; vehicle and equipment fueling; vehicle and equipment maintenance; pile driving operations; concrete curing; concrete finishing; material over water; temporary batch plants. The key to implementing these BMPs is to maintain a clean site and keep water, runoff, and run-on away from potential pollutants, including bare soil.

Waste Management and Materials Pollution Control BMPs. Waste management and materials pollution control, also referred to as “good housekeeping practices” BMPs, prevent pollution by limiting or reducing potential pollutants at their source before they come in contact with stormwater. Waste management involves implementing procedural and structural BMPs for handling, storing, and disposing of wastes generated of waste materials into stormwater runoff or discharges through proper management of the following types of waste:

- Solid
- Sanitary
- Concrete
- Hazardous
- Equipment-related wastes

Materials pollution control involves implementing procedural and structural BMPs in the handling of, storing, and the use of construction materials. Waste management and materials

pollution control BMPs include the following: materials delivery and storage; material use; stockpile management; spill prevention and control; solid waste management; hazardous waste management; contaminated soil management; concrete waste management; sanitary/septic waste management; and liquid waste management.[14]

Development within the CBU Specific Plan Zone is currently administered pursuant to the 2013 CBUSP objectives and policies designed to foster a positive relationship between CBU and the larger community in which it resides. The proposed CBUSP Amendment will replace the 2013 CBUSP to facilitate a more urban-style development schema, but the objectives and policies proposed in the CBUSP Amendment mirror those under which CBU development is currently administered.

4.9.5 Environmental Impacts Before Mitigation

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

Pollutants of concern during construction of any subsequent development project or improvement within the CBU Specific Plan Zone include sediments, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. During construction activities, excavated soil would be exposed and there would be an increased potential for soil erosion compared to existing conditions. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked and have the potential to be transported via storm runoff into downstream receiving waters (i.e., Santa Ana River and, ultimately, the Pacific Ocean).

Construction activities for each individual subsequent project within the CBU Specific Plan Zone would comply with the requirements of the State Water Resource Control Boards (SWRCB) Construction General Permit Title 14, and Title 17 of the RMC. In compliance with Construction General Permit, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared and construction BMPs detailed in the SWPPP would be implemented during construction activities to minimize erosion and siltation and prevent spills. Construction BMPs would include, but not be limited to: erosion control, sediment control, and good housekeeping practices as identified in Section 4.9.4 herein. These BMPs designed to minimize erosion and retain sediment on site, and Good Housekeeping BMPs to prevent spills, leaks, and discharge of construction debris and waste into receiving waters. The SWPPP would be developed, and construction BMPs selected and implemented to target pollutants of concern during construction. The construction BMPs

[14] California Stormwater Quality Association (CASQA), BMP Handbook, 2.3.2 Identify BMP Categories, August 2011.

would be designed to retain sediment and other pollutants on site so they would not reach receiving waters. In addition, an Interim Erosion Control Plan would be prepared for each project in compliance with Chapter 17.16 of the RMC. The Erosion Control Plan would specify the erosion control measures that would be implemented to minimize erosion and siltation during construction.

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

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

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

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

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

Threshold B: Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

If groundwater or perched groundwater is encountered during construction of any subsequent projects or improvements within the CBU Specific Plan Zone, any groundwater dewatering would be minimal and short-term and would not be anticipated to substantially change the groundwater level on or in the vicinity of the subsequent project site or interfere with recharge. Subsequent projects or improvements within the CBU Specific Plan Zone would not require groundwater dewatering during operation. As discussed previously, the proposed Project would decrease impervious surface areas on site which would ultimately increase infiltration. The existing detention basin will continue to allow for some infiltration of stormwater into the local groundwater aquifer.[15] Additional improvements will be implemented if determined to be necessary as required to meet the demand of individual future projects resulting from approval of the CBUSP Amendment, based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

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

CBU maintains an "overlying water right" to pump groundwater from the Riverside-Arlington Subbasin of the Upper Santa Ana Valley Groundwater Basin. CBU's wells have been designed and constructed in accordance with Section 13801 of the California Water Code (CWC), Chapter 6.28 of the RMC, and the provisions of City Resolution No. 14733. Pursuant to the CWC, CBU files an annual notice of its groundwater use with the California State Water Board and/or

[15] *California Baptist University Specific Plan, Public Review Draft.* Chapter 8: Implementation, Section L. Implementation Methods, Subsection 1c Strom Drain, 1-2.City of Riverside August 2018.

Riverside Public Utilities Department (RPU), thereby maintaining private water rights for the use of their on-site wells.

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

Threshold C: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?

During construction activities, soil would be exposed and disturbed, drainage patterns would be temporarily altered during grading and other construction activities, and there would be an increased potential for soil erosion and siltation compared to existing conditions. Additionally, during a storm event, soil erosion and siltation could occur at an accelerated rate. As discussed above, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs (see Section 4.9.3) that would be implemented to reduce impacts to water quality during construction, including those impacts associated with soil erosion and siltation. In addition, an Interim Erosion Control Plan would be prepared for each subsequent project or improvement in compliance with Chapter 17.16 of the RMC. The Erosion Control Plan would specify the erosion control measures that would be implemented to minimize erosion and siltation during construction.

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

on-site erosion and siltation. Finally, the closest river or stream is the Santa Ana River located approximately 2.1 miles north of the Project site; therefore, development of subsequent projects and improvements in accordance with the CBUSP Amendment would not alter the course of a stream or river.

For the reasons discussed above, development of subsequent projects and improvements within the CBUSP would not alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in erosion or siltation or off site. Project impacts related to erosion and siltation would be **less than significant**. No mitigation is required.

Threshold D: Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

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

Existing drainage patterns would be respected throughout the campus to reduce the potential of diversion of flows. Stormwater runoff from the CBU original campus core ultimately drains northwesterly to the Monroe Street Channel. The Monroe Storm Drain Stage I Line has adequate capacity (see analysis for Threshold E) to accommodate all flows associated with the CBU campus, and the onsite basin will continue to capture and detain increased runoff to keep the outflow at or below existing storm flows.[16] Improvements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations. Finally, the closest river or stream is the Santa Ana River located approximately 2.1

[16] *California Baptist University Specific Plan, Public Review Draft.* Chapter 8: Implementation, Section L. Implementation Methods, Subsection 1c Storm Drain 1-2. City of Riverside. August 2018.

miles north of the Project site; therefore, development of subsequent projects and improvements in accordance with CBUSP Amendment would not alter the course of a stream or river.

For the reasons discussed above, development of subsequent projects and improvements within the CBUSP would not alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site. Project impacts related to flooding would be **less than significant**. No mitigation is required.

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

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

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

Stormwater runoff from the CBU original campus core ultimately drains northwesterly to the Monroe Street Channel. The Monroe Storm Drain Stage I Line has adequate capacity to

accommodate all flows associated with the CBU campus, and the onsite basin will continue to capture and detain increased runoff to keep the outflow at or below existing storm flows.[17] Such enhancements will be implemented as required to meet the demand of individual projects based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations. For these reasons, with construction of the storm water improvements described in the CBUSP Amendment, development of subsequent projects and improvements within the CBUSP would not create or contribute additional runoff water to the downstream storm drain system that would exceed the storm drain system capacity.

As discussed previously, construction of any subsequent projects or improvements within the CBU Specific Plan Zone has the potential to introduce pollutants to the storm drainage system from erosion, siltation, and accidental spills. However, the Construction General Permit requires preparation of a SWPPP to identify construction BMPs (please see Section 4.9.4) to be implemented during construction of subsequent development projects or improvements to reduce impacts to water quality, including those impacts associated with soil erosion, siltation, and spills. In addition, an Interim Erosion Control Plan would be prepared for each subsequent development project or improvement in compliance with Chapter 17.16 of the RMC. The Erosion Control Plan would specify the erosion control measures that would be implemented to minimize erosion and siltation during construction. In the event that groundwater is encountered during construction and required disposal in the storm drain system, any groundwater dewatering would be minimal and short-term and would not be anticipated to exceed the capacity of the storm drain system. In addition, any groundwater dewatering during excavation would be conducted in accordance with the Groundwater Discharge Permit, which would require testing and treatment (as necessary) of groundwater encountered during dewatering or groundwater well construction prior to release so as not to provide additional sources of polluted runoff to the storm drain system. As discussed previously, a WQMP would be prepared for subsequent development projects or improvements and would specify the source control, site design, LID, and treatment BMPs that would be implemented to target and reduce pollutants of concern in storm water runoff from the campus during operation.

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

[17] *California Baptist University Specific Plan, Public Review Draft.* Chapter 8: Implementation, Section L. Implementation Methods, Subsection 1c Strom Drain 1-2. City of Riverside August 2018.

substantial additional sources of polluted runoff would be **less than significant**. No mitigation is required.

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

Less than significant. Please refer to the discussion under Threshold A above.

Threshold G: Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) (Map No. 06065C0720G, August 28, 2009), the CBU Specific Plan Zone is not located within a 100-year floodplain. The CBU Specific Plan Zone is mapped within Zone X, which is defined as the area determined to be outside the 0.2 percent annual change floodplain (500-year floodplain). In addition, the CBU Specific Plan Zone is not located within a DWR Awareness Floodplain. Therefore, implementation of the CBUSP Amendment would not place housing within a 100-year flood hazard area, and **no impacts** would occur. No mitigation is required.

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

As discussed above, the CBU Specific Plan Zone is not located within a 100-year floodplain or a DWR Awareness Floodplain. The Project site is mapped within Zone X, which is defined as the area determined to be outside the 0.2 percent annual change floodplain (500-year floodplain). Therefore, implementation of the CBUSP Amendment would not place structures within a 100-year flood hazard area, and **no impacts** would occur. No mitigation is required.

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

According to the Public Safety Element of the City's *General Plan 2025*, the northwest side of the CBU Specific Plan Zone is located within the inundation zone of the Prenda Dam and the Woodcrest Dam covers the remainder of the CBU Specific Plan Zone. Implementation of the CBUSP Amendment would not increase the chance of inundation from failure of Prenda Dam or Woodcrest Dam. Both Prenda Dam and Woodcrest Dam are maintained and inspected to ensure their integrity and to ensure that risks are minimized. The safety of these dams is the responsibility of the United States Army Corps of Engineers, which conducts inspections on a regular basis. Although implementation of the CBUSP Amendment would result in an additional students and staff on the Project site, the CBUSP Amendment would not increase the chance of inundation from failure of Prenda Dam or Woodcrest Dam. Therefore, impacts from exposure of

people or structures to loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam, would be **less than significant**. No mitigation is required.

Threshold J: Would the project result in inundation by seiche, tsunami, or mudflow?

Seiching is a phenomenon that occurs when seismic ground shaking induces standing waves (seiches) inside water retention facilities (e.g., reservoirs and lakes). Such waves can cause retention structures to fail and flood downstream properties. There are no unenclosed water retention facilities in close proximity to the Project site. The closest unenclosed body of water is Lake Matthews, which is approximately 5 miles southwest of the CBU Specific Plan Zone. The risk associated with possible seiche waves, therefore, is **less than significant impact**. No mitigation is necessary.

Tsunamis are generated ocean wave trains generally caused by tectonic displacement of the sea floor associated with shallow earthquakes, sea floor landslides, rock falls, and exploding volcanic islands. The CBU Specific Plan Zone is located approximately 35 miles from the ocean shoreline and is not in a tsunami inundation area. The risk associated with tsunamis is, therefore, **no impact** would occur with implementation of the CBU Specific Plan Zone. No mitigation is required.

Mudslides and slumps are described as a shallower type of slope failure usually affecting the upper soil mantle or weathered bedrock underlying natural slopes and triggered by surface or shallow subsurface saturation. The CBU Specific Plan Zone is relatively flat, and no existing landslides are present on the property. Additionally, the Project site has been previously excavated, filled, graded, and leveled with the development of the CBU. Surrounding areas are also primarily developed and not located on a hillside. The risk associated with possible mudflows and mudslides is, therefore, **less than significant**. No mitigation is necessary.

4.2.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to hydrology and water quality have been found to be potentially significant, no mitigation measures are required. Adherence to standard procedures, including applicable objectives and policies of the CBUSP Amendment, the Construction General Permit, Groundwater Discharge Permit, Riverside County MS4 Permit, construction and operational BMPs, and RMC will ensure all impacts related to hydrology and water quality are less than significant.

4.2.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates the proposed Project will have less than significant impacts to hydrology and water quality. Therefore, no mitigation measures are required.

4.2.8 References

California Department of Water Resources. 2003. California's Groundwater, Bulletin 118 Update.

California Department of Water Resources. Awareness Floodplain Mapping, Floodplain Boundaries- Riverside County, Riverside West Quadrangle. http://www.water.ca.gov/floodmgmt/lrafmo/fmb/fes/awareness_floodplain_maps/riverside/riverside_west.cfm. (Accessed August 21, 2017).

California Stormwater Quality Association (CASQA), BMP Handbook, 2.3.2 Identify BMP Categories, August 2011.

City of Riverside. *California Baptist University Specific Plan, Public Review Draft*. August 2018.

City of Riverside. General Plan 2025. November 2007, Amended November 2012.

City of Riverside. *Green Action Plan, 2012*. http://www.greenriverside.com/about-green-riverside/green-action-plan. (Accessed September 5, 2017).

Santa Ana Regional Water Quality Control Board. Staff Report on Bacterial Indicator Total Maximum Daily Loads in the Middle Santa Ana River Watershed. 2005.

San Ana Regional Water Quality Control Board. Water Quality Control Plan for the Santa Ana River Basin. 1995, Updated 2011. http://waterboards.ca.gov/santaana/water_issues/programs/basin_plan/ (Accessed August 17, 2017).

Santa Ana Regional Water Quality Control Board. Watershed Management Initiative Chapter. November 2004.

Santa Ana Watershed Association. http://sawatershed.org/?q=sarwatershed. (Accessed August 18, 2017).

4.10 LAND USE AND PLANNING

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential impacts to established communities; potential conflicts with applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effects by agencies with jurisdiction over the project; and potential conflicts with applicable habitat conservation plans or natural community conservation plans resulting from implementation of the proposed Project. No comments addressing land use and planning were received during the NOP comment period.

4.10.1 Setting

The approximately 167-acre California Baptist University (CBU) campus is located in the Ramona neighborhood of the City and is generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street. CBU owns six additional parcels to the north, east, and west of the original campus core (Figures 1-2 and 1-3).

Existing Conditions

Development of the CBU Campus and associated facilities is currently administered pursuant to the 2013 California Baptist University Specific Plan (CBUSP), adopted March 26, 2013 under Resolution No. 22511 and Ordinance No. 7203 pursuant to specific objectives and policies designed to foster a positive relationship between CBU and the larger community in which it resides.[1] Five unique Planning Areas (Mixed Use/Academic, Mixed Use/Residential, Mixed Use/Urban, Athletics, and Open Space) currently allocate uses throughout the 2013 CBUSP in order to define the development framework for the campus (Figure 2-3).

The northern boundary of the CBU Campus is located generally along Magnolia Avenue, which is a tree-lined arterial street established in 1876 as a major thoroughfare and is designated a Scenic Boulevard, Parkway, and Special Boulevard within the Circulation and Community Mobility Element of the City's *General Plan 2025*.[2] As well, there are several historic properties within the CBU Campus that are significant at the national, State, and local level (Figure 4.5-1). The western and northern boundaries of the original campus core (along Monroe Street and Magnolia Avenue) are within the Magnolia Heritage District of the *Magnolia Avenue Specific Plan* (Figure 2-4).

---

1 *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. Pages 1, 27, and 29. City of Riverside. Adopted March 26, 2013.

2 Circulation and Community Mobility Element, *Riverside General Plan 2025*. Figures CCM-4 and 5.1-1, Tables 5.1-A and 5.1-B. City of Riverside. November 2007, Amended November 2012.

Land uses surrounding the CBU campus include single-family and multi-family residential, church, and convalescent uses to the north; single-family residential, retail, and office uses to the east; single-family and multi-family residential, commercial, and school uses to the west; and State Route 91 to the south.

Surrounding Land Uses

The uses adjacent to the proposed Project site are a mixture of single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; and single-family and multi-family residential, commercial and school uses to the west. State Route (SR) 91 is located to the south. General commercial uses are located further south beyond SR-91, including car dealerships.

Proposed Project

The CBU campus is generally located at 8432 Magnolia Avenue in the City consisting of an approximately 167-acre Planning Area that comprises the CBUSP. The proposed CBUSP Planning Area includes the original campus core plus six additional properties to the north, east and west. These properties include the approximately 156.4-acre current CBUSP Planning Area (all CBU properties generally bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street plus the four properties to the north and east along Magnolia Avenue and Adams Street owned and operated by CBU plus the Health Sciences Campus and Wellness Center located on approximately 10.6 acres encompassing two properties along the west frontage of Monroe Street owned and operated by CBU. The additional areas are located immediately adjacent to or within one block of the original campus core. The CBUSP Planning Area includes two properties along Diana Avenue not owned by CBU (3476 Wilma Court and 3502 Adams Street). Refer to previously referenced Figures 1-1, 1-2, and 1-3.

Land Use Applications

The following discussion summarizes the key land use and planning related requests included as part of the proposed Project.

General Plan Amendment. The proposed Project is an Amendment to the CBUSP. The CBUSP Amendment includes and expansion to the CBU campus footprint to add the Health Sciences buildings and associated properties on the west side of Monroe Street near Diana Avenue. The current General Plan designation for this property is "Public Facilities/Institutional." The proposed Project includes a General Plan Amendment to change the designation to "CBU Specific Plan."

Specific Plan Amendment. The proposed Project, namely the CBUSP Amendment, includes substantive changes to the current CBUSP approved in 2013. The CBUSP Amendment would

establish a Development Plan (CBUSP Amendment Chapter 3) that identifies allowed and permitted land uses, and specifies Land Use Regulations and Development Standards (CBUSP Amendment Chapter 3) to guide development on the CBU campus towards an ultimate goal of accommodating campus wide growth to accommodate an increase in student enrollment to 12,000 students by 2025.

Zone Change. The CBUSP Amendment proposes changes in zoning for properties within original core of the CBUSP Planning Area. These include the following:

- CBUSP-MU/A – CBUSP Mixed-Use/Academic to the CBU Specific Plan Zone;
- CBUSP-MU/R – CBUSP Mixed-Use/Residential to the CBU Specific Plan Zone;
- CBUSP-MU/U – CBUSP Mixed-Use/Urban to the CBU Specific Plan Zone;
- CBUSP-A – CBUSP Athletics to the CBU Specific Plan Zone; and
- CBUSP-OS – CBUSP Open Space to the CBU Specific Plan Zone.

Additionally, the Health Science Campus and Wellness Center would be rezoned from R-1-7000 – Single Family Residential to the CBU Specific Plan Zone.

Riverside Municipal Airport Land Use Compatibility Plan Consistency. The Riverside County Airport Land Use Commission (RCALUC) administers the Airport Land Use Compatibility Plans (ALUCP) for airports countywide. The intent of the CBUSP Amendment is to maintain consistency with the regulations defined in the Riverside Municipal Airport ALUCP. Portions of the Specific Plan area lie within Zone D (Primary Traffic Patterns and Runway Buffer Area) and Zone E (Other Airport Environs) of the Riverside Municipal Airport ALUCP. The RCALUC reviewed and approved the proposed CBUSP Amendment on November 9, 2017 under case ZAP1090RI17. The RCALUC determined the proposed Project was consistent with the 2005 Riverside Municipal Airport Land Use Compatibility Plan.

4.10.2 Related Regulations

Federal Regulations

There are no federal regulations associated with Land Use and Planning that apply to the proposed Project.

State Regulations

California Government Code Section 65450. Section 65450 et seq. of the California Government Code authorizes cities to prepare, adopt, and administer Specific Plans for portions of their jurisdictions as a means of implementing the City's General Plan. All Specific Plans must comply with Sections 65450–65457 of the Government Code.

California Constitution, Article XI, Section 7. Article XI, Section 7, of the California State Constitution gives cities and counties the authority to regulate land use. California State Planning and Land Use Law (Government Code Section 65000 et seq.) sets forth minimum standards for the regulation of land use at the city and county level.

Regional

Southern California Association of Governments (SCAG) Plans. SCAG (the designated Metropolitan Planning Organization [MPO] for the Counties of Ventura, Orange, San Bernardino, Riverside, Imperial, and Los Angeles) is federally mandated to develop plans for transportation, growth management, hazardous waste management, and air quality. SCAG's main responsibilities under State and federal law are preparing the Regional Transportation Plan (RTP) and the Regional Housing Needs Assessment (RHNA). While SCAG does not have formal regulatory authority and cannot directly implement land use decisions, SCAG guides land use planning for the southern California region through intergovernmental coordination and consensus building.

Regional Comprehensive Plan (RCP). SCAG prepared the 2008 RCP to serve as a framework to guide decision-making with respect to the growth and changes that can be anticipated in the region in the coming years. The RCP is a major advisory plan prepared by SCAG that addresses important regional issues like housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance.

The RCP identifies voluntary best practices to approach growth and infrastructure challenges in an integrated and comprehensive way. It also includes goals and outcomes to measure progress toward a more sustainable region. The RCP includes nine chapters, each based on specific areas of planning or resource management. Each of the nine chapters contains goals, policies, implementation, and strategies to achieve SCAG's overall goals of improving the standard of living for all; improving the quality of life for all; and enhancing equity and access to government. Local governments are required to use the RCP as the basis for their own plans and are required to discuss the consistency of projects of "regional significance" with the RCP.

Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS): The 2016-2040 RTP adopted by SCAG on April 7, 2016 analyzed the region's transportation system, future growth projections, and potential funding sources in order in order to develop a long-term framework for transportation improvements and maintenance. The RTP includes policies and regulations set forth to ensure development within the SCAG regional area is within planned and forecast socioeconomic projections. As part of the RTP, SCAG developed an SCS, which was required by Senate Bill 375, the Sustainable Communities Act of 2008. The SCS is intended to combine land use and transportation planning with the overall goal of reducing greenhouse gas emissions generated by vehicle travel.

South Coast Air Quality Management District (SCAQMD). The SCAQMD is the regional agency responsible for the regulation and enforcement of federal, State, and local air pollution control regulations in the South Coast Air Basin (Basin), where the project is located. The SCAQMD operates monitoring stations in the Basin, develops rules and regulations for stationary sources and equipment, prepares emissions inventory and air quality management planning documents, and conducts source testing and inspections. The SCAQMD's Air Quality Management Plans (AQMPs) include control measures and strategies to be implemented to attain California Ambient Air Quality Standards (CAAQS) and National Ambient Air Quality Standards (NAAQS) in the Basin. The SCAQMD then implements these control measures as regulations to control or reduce criteria pollutant emissions from stationary sources or equipment.

On March 3, 2017, the SCAQMD's governing board adopted the Final 2016 AQMP.[3] Based on General Plans for cities and counties in the Basin, demographic growth forecasts for various socioeconomic categories (i.e., population, housing, employment by industry) developed by the SCAG for its 2016 Regional Transportation Plan/Sustainable Communities Strategy were used in the 2016 AQMP. The 2016 AQMP reduction and control measures, which are outlined to mitigate emissions, are based on existing and projected land uses and development. The 2016 AQMP was submitted to CARB on March 10, 2017 and is awaiting final approval.

A detailed discussion on the 2016 AQMP and an analysis on the proposed Project's consistency with the plan are provided in Section 4.3-*Air Quality*, since the 2016 AQMP is more specifically tailored to the environmental factors discussed in Section 4.3-*Air Quality*.

Western Riverside County Multiple Species Habitat Conservation Plan (MSHCP). To address regional biological resources and habitat sustainability, the MSHCP was developed in 2001 by the County of Riverside in cooperation with State and federal agencies. The MSHCP

[3] *Final 2016 Air Quality Management Plan.* South Coast Air Quality Management District. March 2017. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15. (Accessed September 6, 2017).

applies to unincorporated and incorporated Riverside County land, excluding Native American tribal land, west of the crest of the San Jacinto Mountains to the Orange County line. It applies to a total area of approximately 1.26 million acres (approximately 1,997 square miles) and is one of the largest conservation plans in the U.S. The MSHCP covers multiple species and multiple habitats within multiple jurisdictions, including the CBU Specific Plan Zone.

The MSHCP was conceived, developed, and is being implemented specifically to address the direct, indirect, cumulative, and growth-related effects on covered species resulting from build out of planned land use and infrastructure, including the proposed CBUSP Amendment. The MSHCP involves efforts by the County, State, and federal governments, the fourteen cities in western Riverside County, and private and public entities engaged in construction activities that potentially affect the species covered under the MSHCP. The plan specifies an obligation of local projects, both public and private, to mitigate their impacts on species. The MSHCP includes incentives for conservation or the purchase of properties from willing sellers and will eventually result in a Conservation Area in excess of 500,000 acres, focusing on conservation of 146 species. The MSHCP Conservation Area includes approximately 347,000 acres of existing Public/Quasi-Public Lands and approximately 153,000 acres of Additional Reserve Land.

The MSHCP Conservation Area is made up of existing and proposed "Core" areas, or large assemblages of public land that contain important habitat and listed or sensitive species populations. The core areas are connected by a series of "linkages" or "corridors" identified across public and private lands to allow wildlife movement and genetic connectivity and diversity among the core areas. The MSHCP identifies conservation areas through a series of "criteria cells" within which certain biological resources (i.e., vegetation and/or physical features) should be preserved over the long term. The MSHCP also establishes various processes to evaluate land development proposals in light of its goals and requirements. The MSHCP also identifies when studies need to be performed within certain criteria cells to determine the presence or absence of listed or otherwise sensitive species of plants or animals. In accordance with the CESA, the MSHCP establishes a mitigation strategy based on establishment of reserves for species listed under the MSHCP aided by a per-acre mitigation fee levied by the City pursuant to Ordinance No. 6709 of the City Municipal Code[4] and by Riverside County pursuant to Ordinance No. 810.2.[5]

A detailed discussion on the Western Riverside MSHCP and an analysis on the proposed Project's consistency with the plan are provided in Section 4.4-*Biological Resources*, since the

[4] *Western Riverside Multiple Species Habitat Conservation Plan Fee Program, Chapter 16.72*. City of Riverside Municipal Code. https://www.riversideca.gov/municode/pdf/16/16-72.pdf (Accessed August 23, 2017.

[5] *Ordinance No. 810.2.*County of Riverside. http://www.rivcocob.org/ords/800/810.htm (Accessed August 23, 2017).

Western Riverside MSHCP is more specifically tailored to the environmental factors discussed in Section 4.4-*Biological Resources*.

Stephen's Kangaroo Rat Habitat Conservation Plan (SKRHCP). The initial (short-term) plan for the Stephen's Kangaroo Rat (SKR) was approved by the United States Fish and Wildlife Service (USFWS) in October 1990, and the current (long-term) plan was approved in March 1996 and is in effect for 30 years. The SKR was listed as a threatened species under the CESA in 1971. The SKR was placed on the federal endangered species list in September 1988. According to the USFWS, the listing the SKR was the immediate catalyst for the preparation of the short-term plan, and ultimately the process that produced the long-term SKR plan. In accordance with the CESA, the SKRHCP establishes a mitigation strategy based on establishment of reserves for the SKR aided by a per-acre mitigation fee levied by Riverside County pursuant to Ordinance No. 663.[6]

A detailed discussion on the SKRHCP and an analysis on the proposed Project's consistency with the plan are provided in Section 4.4-*Biological Resources*, since the SKRHCP is more specifically tailored to the environmental factors discussed in Section 4.4-*Biological Resources*.

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

A detailed discussion on the ALUCP and an analysis on the proposed Project's consistency with the plan are provided in Sections 4.1-*Aesthetics* and Section 4.8-*Hazards and Hazardous Materials*, since the ALUCP is more specifically tailored to the environmental factors discussed in Sections 4.1-*Aesthetics* and Section 4.8-*Hazards and Hazardous Materials*.

Sana Ana River Basin Water Quality Control Plan (Basin Plan). The Santa Ana RWQCB has adopted a Water Quality Control Plan (Basin Plan) for its region of responsibility, which includes the City of Riverside (City). The RWQCB has delineated water resource area boundaries based on hydrological features. For purposes of achieving and maintaining water

[6] *Ordinance No. 663.* County of Riverside. http://www.rivcocob.org/ords/600/663.10.pdf (Accessed August 24, 2017).

quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State antidegradation policy (State Board Resolution No. 68-16), which is designed to maintain high-quality waters while allowing some flexibility if beneficial uses are not unreasonably affected.

A detailed discussion on the Basin Plan and an analysis on the proposed Project's consistency with the plan are provided in Section 4.9-*Hydrology and Water Quality*, since the Basin Plan is more specifically tailored to the environmental factors discussed in Section 4.9-*Hydrology and Water Quality*.

Local Regulations

City of Riverside General Plan 2025. The City's General Plan was adopted in November 2007 and is the blueprint for future growth and development in the City through the year 2025 and beyond (Figure 2-2). The *General Plan 2025* Land Use designation for the project site is CB USP - California Baptist University Specific Plan and PF - Public Facilities/Institutional.[7] These designations allow for a broad range of educational-related activities requiring large areas of land with convenient access for commuters utilizing various modes of transportation (i.e. automobiles, bicycles, pedestrian, and mass transit). Permitted uses include academic (including student housing), administrative, athletic, office, services, and commercial uses designed to foster a positive relationship between CBU and the larger community in which it resides.

The following objectives are drawn from the City's *General Plan 2025* and are applicable to the proposed project. Although the objectives are listed here, each of these objectives along with the specific policies are presented in Table 4.10-A later in this section with an evaluation of the project's consistency with the stated objectives and policies.

City of Riverside General Plan Objectives and Policies

Land Use and Urban Design Element

Objective LU-8: Emphasize smart growth principles through all steps of the land development process.

Objective LU-11: Create a network of parkways to establish stronger linkages between Riverside's neighborhoods, major elements of its natural environment and neighborhood parks and schools.

[7] *Land Use/Urban Design Element,* Riverside General Plan 2025. Figure LU-10. City of Riverside. 2007, Amended March 2013.

Objective LU-12: Restore the Magnolia/Market Corridor to its historical role as a scenic "showcase roadway" that spans the City of Riverside while updating its function as a key transit corridor to support future growth.

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port, Riverside Municipal and Flabob Airports.

Objective LU-27: Enhance, maintain, and grow Riverside's inventory of street trees.

Objective LU-29: Minimize the visual impact of aerial facilities on the City's landscape.

Objective LU-78: Maintain Ramona's established residential character while allowing for higher-intensity, transit-oriented residential and mixed residential-commercial development on opportunity sites, particularly along Magnolia and California Avenues.

Circulation and Community Mobility Element

Objective CCM-2: Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development.

Objective CCM-3: Design the Magnolia Avenue/Market Street Corridor as a transit- and pedestrian-oriented Mixed Use boulevard.

Objective CCM-9: Promote and support an efficient public multi-modal transportation network that connects activity centers in Riverside to each other and to the region.

Objective CCM-10: Provide an extensive and regionally linked public bicycle, pedestrian and equestrian trails system.

Housing Element

Objective H-2: To provide adequate diversity in housing types and affordability levels to accommodate housing needs of Riverside residents, encourage economic development and sustainability, and promote an inclusive community.

Public Safety Element

Objective PS-5: Provide safe pedestrian and bicyclist environments Citywide.

Objective PS-6: Protect property in urbanized and nonurbanized areas from fire hazards.

Objective PS-10: Improve the community's ability to respond effectively to emergencies.

Policy PS-10.3 Ensure that public safety infrastructure and staff resources keep pace with new development planned or proposed in Riverside and the Sphere of Influence.

Policy PS-10.4 Continue to ensure that each development or neighborhood in the City has adequate emergency ingress and egress, and review neighborhood access needs to solve problems, if possible.

Policy PS-10.5 Coordinate with local agencies and organizations to educate all residents and businesses to take appropriate action to safeguard life and property during and immediately after emergencies.

Objective PS-11: Preserve the historic and archaeological resources of the City from demolition, destruction, and/or severe damage in the event of natural and human-caused disasters, hazards, and/or other emergency events.

Policy PS-11.1 Protect resources listed in the Historical Resources Inventory from premature or inadvertent demolition and encourage retrofitting of these resources to protect them from damage caused by a disaster episode.

Policy PS-11.2 Take reasonable steps to prevent the loss of historic building without endangering public safety or contributing to additional property damage.

Policy PS-11.3 Preserve sensitive and significant archaeological, cultural and historic resources by maintaining coordination between Riverside's Emergency Management Office, the Eastern Information Center (EIC) at the University of California, Riverside (UCR) and Native American Tribes identified by the Native American Heritage Commission (NAHC) to obtain area specific information related to sensitive resources during natural and human-caused disasters, hazards and/or other emergency events.

Noise Element

Objective N-1: Minimize noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment.

Policy N-1.1 Continue to enforce noise abatement and control measures particularly within residential neighborhoods.

Policy N-1.2 Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code.

Policy N-1.3 Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.

Policy N-1.4 Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.

Policy N-1.5 Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas.

Policy N-1.7 Evaluate noise impacts from roadway improvement projects by using the City's Acoustical Assessment Procedure.

Policy N-1.8 Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.

Objective N-2: Minimize the adverse effects of airport-related noise through proper land use planning.

Policy N-2.1 Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Figure N–10 – Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions.

Policy N-2.2 Avoid placing noise-sensitive land uses (e.g., residential uses, hospitals, assisted living facilities, group homes, schools, day care centers, etc.) within the high noise impact areas (over 60 dB CNEL) for Riverside Municipal Airport and Flabob Airport in accordance with the Riverside County Airport Land Use Compatibility Plan.

Policy N-2.5 Utilize the Airport Protection Overlay Zone, as appropriate, to advise landowners of special noise considerations associated with their development.

Objective N-4: Minimize ground transportation-related noise impacts.

Policy N-4.1 Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (i.e., earthen berms, landscaped walls, lowered streets, improved technology).

Policy N-4.5 Use speed limit controls on local streets as appropriate to minimize vehicle traffic noise.

<u>Open Space and Conservation Element</u>

Objective OS-1: Preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.

Policy OS-1.5 Require the provision of open space linkages between development projects, consistent with the provisions of the Trails Master Plan, Open Space Plan and other environmental considerations including the MSHCP (Multiple Species Habitat Conservation Plan).

Policy OS-1.6 Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections.

Policy OS-1.8 Encourage residential clustering as means of preserving open space.

Objective OS-8: Encourage the efficient use of energy resources by residential and commercial users.

Policy OS-8.1 Support the development and use of non-polluting, renewable energy sources.

Policy OS-8.2 Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in existing developments.

Policy OS-8.3 Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources.

Policy OS-8.4 Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.

Policy OS-8.5 Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).

Policy OS-8.6 Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24.

Policy OS-8.7 Encourage mixed use development as a means of reducing the need for auto travel.

Policy OS-8.8 Encourage the use of clean burning fuels and solar energy for space and water heating purposes and explore ways to participate in California New Solar Homes Partnerships.

Policy OS-8.9 Encourage construction and subdivision design that allows the use of solar energy systems.

Policy OS-8.10 Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.

Policy OS-8.12 Require bicycle parking in new non-residential development.

Objective OS-10: Preserve the quantity and quality of all water resources throughout Riverside.

Policy OS-10.1 Support the development and promotion of water conservation programs.

Policy OS-10.4 Develop a recommended native, low-water-use and drought-tolerant plant species list for use with open space and park development. Include this list in the landscape standards for private development.

Policy OS-10.5 Establish standards for the use of reclaimed water for landscaping.

Policy OS-10.6 Continue to enforce RWQCB regulations regarding urban runoff.

Policy OS-10.7 Work with the RWQCB in the establishment and enforcement of urban runoff water quality standards.

Policy OS-10.9 Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in storm water runoff and provide groundwater percolation zones.

Policy OS-10.10 Protect aquifer recharge features and areas of important aquifers from degradation of water quality and reduction of recharge.

Air Quality Element

Objective AQ-5: Increase energy efficiency and conservation in an effort to reduce air pollution.

Objective AQ-8: Make sustainability and global warming education a priority for the City's effort to protect public health and achieve state and federal clean air standards.

Public Facilities Element

Objective PF-3: Maintain sufficient levels of wastewater service throughout the community.

Objective PF-4: Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows.

Objective PF-5: Minimize the volume of waste materials entering regional landfills.

Parks and Recreation Element

Objective PR-1: Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents.

Historic Preservation Element

Objective HP-1: To use historic preservation principles as an equal component in the planning and development process.

Objective HP-4: To fully integrate the consideration of cultural resources as a major aspect of the City's planning permitting and development activities.

Objective HP-5: To ensure compatibility between new development and existing cultural resources.

Objective HP-7: To encourage both public and private stewardship of the City's cultural resources.

Riverside Municipal Code

Title 19 – Zoning Code. Title 19 of the Riverside Municipal Code (RMC) contains the Zoning Code for the City, and also includes regulations for site planning and development. The zoning designation for the project site is Specific Plan (CBUSP), within which five unique Planning Areas (Mixed Use/Academic, Mixed Use/Residential, Mixed Use/Urban, Athletics, and Open Space) currently allocate uses throughout the 2013 CBUSP, defining the development framework for the campus (Figure 2-3). The provisions of the CBUSP Amendment replace RMC Title 19 (*Zoning Code)* regarding the use, development, and entitlement of properties. Where the Specific Plan is silent with regard to any land use regulations, the provisions of RMC Title 19 (*Zoning Code)* shall apply. However, the standards and guidelines identified in the CBUSP Amendment shall take precedence over the general standards and guidelines contained in the Zoning Code.

Title 16 – Building and Construction. Title 16 of the City's Municipal Code sets forth regulations for design, construction, quality of materials, use and occupancy, location and maintenance of buildings, equipment, structures, and grading for development within the City. This title also covers requirements for electrical work, plumbing, heating, cooling, and other equipment specifically regulated in the City. Title 16 provides minimum standards for the safety of buildings and building construction within the City, in order to protect life and property. The Project would be required to meet all applicable provisions of Title 16.

Title 7 – Noise Control. Title 7 of the City's Municipal Code contains the City's Noise Control Code. The Project would be subject to the applicable provisions of this code during construction and operation. The Noise Control Code sets forth regulations that control and prohibit unnecessary, excessive, and/or annoying noise in the City. Compliance with the Noise Control

Code minimizes noise levels in the City and reduces the effects of noise, thereby providing a safer and healthier living environment. (See Section 4.12 - *Noise and Vibration*, in this EIR for more details on the Noise Control Code and its applicability to the Project.)

Title 17 – Grading Code. Title 17 of the City's Municipal Code sets forth regulations for grading projects. Compliance with these regulations helps minimize erosion, dust, water runoff, effects to natural landforms, and construction equipment emissions. The Project would be required to meet the applicable provisions of Title 17.

Title 18 – Subdivision Code. Title 18 sets forth regulations for the design of subdivisions. Provisions include lot size requirements, street capacity requirements, pedestrian and vehicular safety requirements, and site access requirements to ensure adequate access to each building site. Title 18 also contains provisions that help preserve the natural assets of the City, with the purpose of preventing indiscriminate clearing of property and destruction of vegetation and other desirable landscape features.

Title 20 – Cultural Resources. Title 20 of the Municipal Code provides guidelines for preserving, protecting, restoring, and rehabilitating historical and cultural resources within the City in order to maintain and encourage appreciation of its history and culture, improve the quality of the City's built environment, maintain the character and identity of its communities, and enhance the local economy through historic preservation.

Magnolia Avenue Specific Plan. Portions of the Project site are currently within the boundaries of the Magnolia Avenue Specific Plan. Upon project approval, the Project site would be removed from the boundaries of the Magnolia Avenue Specific Plan, via a Specific Plan Amendment.

City of Riverside Green Action Plan. In July 2005, the City of Riverside assembled a Clean and Green Task Force that developed guidelines for a cleaner, greener, and more sustainable city. Its sustainability policy statement highlighted the following categories: save water, keep it clean, make it solar, make it shady, clean the air, save fuel, make it smart, and build green. The task force created a 38-point Clean and Green Sustainable Riverside Action Plan (Green Action Plan) to transform the policy statement into an implementation plan. The Green Action Plan is an evolving document that outlines ways to improve air quality, reduce traffic congestion, increase accessibility and use of parks, and otherwise preserve the environment.[8] The first Riverside Green Action Plan was approved by the City Council in December 2007. To ensure that the tasks of the Green Action Plan would be carried out successfully, the City formed a Green Accountability Performance Committee, and within just two years, nearly all of the plan's 38

[8] *Green Action Plan, 2012.* City of Riverside. http://www.greenriverside.com/about-green-riverside/green-action-plan. (Accessed September 5, 2017).

tasks had been accomplished. In February 2009, the California Department of Conservation introduced Riverside as California's First Emerald City, and in September 2009, the City introduced a Green Action Plan–Emerald City update. The latest Green Action Plan (2012) includes 19 goals and more than 50 tasks within the following eight areas: energy, GHG emissions, waste, urban design, urban nature, transportation, water, and healthy communities.

A detailed discussion on the Green Action Plan and an analysis on the proposed Project's consistency with the plan are provided in Section 4.18-*Energy Conservation*, since the Green Action Plan is more specifically tailored to the environmental factors discussed in Section 4.18-*Energy Conservation*.

Urban Forestry Policy Manual. The City's Urban Forestry Policy Manual is a guideline for the planting, pruning, preservation and removal of all trees in the City rights-of-way and recreational facilities. The manual does not apply to trees located on private property. The specifications in the Riverside Urban Forestry Policy Manual are based on national standards for tree care established by the International Society of Arboriculture, the National Arborists Association, and the American National Standards Institute. If implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual.

A detailed discussion on the Urban Forestry Policy Manual and an analysis on the proposed Project's consistency with the manual are provided in Section 4.4-*Biological Resources*, since the Urban Forestry Policy Manual is more specifically tailored to the environmental factors discussed in Section 4.4-*Biological Resources*.

4.10.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, the project could have a significant impact on land use and planning if the proposed project would:

- (Threshold A) Physically divide an established community;
- (Threshold B) Conflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;

- (Threshold C) Conflict with any applicable habitat conservation plan or natural community conservation plan.

Methodology

The focus of the land use analysis is on land use impacts that would result from implementation of the proposed Project. Land use conflicts are identified and evaluated based on existing land uses, land uses proposed as part of the Project, land use designations, and standards and policies related to land use.

Section 15125 (d) of the *CEQA Guidelines* requires EIRs to "discuss any inconsistencies between the proposed project and applicable general plans and regional plans." The objective of such a discussion is to find ways to modify a project, if warranted, to eliminate any identified inconsistencies with relevant plans and policies, and thereby avoid creating an impact to the environment that consistency with the plan would otherwise mitigate. This EIR section includes an evaluation of the consistency of the proposed Project with pertinent objectives and policies of the City's *General Plan 2025* and Municipal Code. Where applicable, the proposed project's consistency with SCAG's (a) Regional Comprehensive Plan (RCP); (b) Regional Transportation Plan (RTP); and (c) Sustainable Communities Strategy (SCS) Plan related to the RTP also are discussed below. However, the proposed project's consistency with other regional and local plans (i.e., Air Quality Management Plan, Multiple Species Habitat Conservation Plan, Stephens Kangaroo Rat Habitat Conservation Plan, Urban Forestry Policy Manual, Airport Land Use Compatibility Plan, Sana Ana River Basin Water Quality Control Plan, and Green Action Plan) are discussed in detail respectively in Draft EIR Sections 4.3-*Air Quality*, 4.4-*Biological Resources*, 4.8-*Hazards and Hazardous Materials*, 4.9-*Hydrology and Water Quality*, and 4.18-*Energy Conservation* since those plans are more specifically tailored to the environmental factors discussed in those respective Draft EIR Sections.

4.10.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through design. The proposed CBUSP Amendment will replace the existing 2013 CBUSP to facilitate a more urban-style development pattern, but the objectives and policies proposed in the CBUSP Amendment mirror those under which CBU development is currently administered. The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions in order to further strengthen the campus identity of a quality academic institution with historic roots to the community.

Implementation of the CBUSP Amendment would streamline the entitlement process and provide a comprehensive set of guidelines that would ensure the quality and compatibility of future development within the CBU Specific Plan Zone. Objectives and policies included in the CBUSP Amendment propose design guidelines to ensure an enduring, identifiable, and dynamic image for the CBU Campus and the community as it transitions to an urban-style campus from the current suburban model.

CBUSP Amendment Objectives and Policies

Objective 1: Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.

Policy 1.1: Pursue the development program and campus improvements described in this Specific Plan while maintaining the flexibility needed to accommodate evolving academic and student needs and dynamic growth.

Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined herein.

Policy 2.2: Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus.

Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.

Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.

Policy 3.1: Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum.

Policy 3.2: Provide a variety of safe and secure housing opportunities for students, including through the conversion of existing apartment units to student housing.

Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.

Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.

Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.

Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.

Policy 4.1: Ensure consistency with City of Riverside street standards regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus.

Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus.

Policy 4.3: Accommodate the University's parking demand in a manner that minimizes external impacts , as required per this Specific Plan.

Policy 4.4: Pursue the vacation of Diana Avenue to provide reasonable control over the access and vehicle speed along this southern campus edge.

Policy 4.5 Provide adequate and conveniently located bicycle racks throughout the campus.

Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission.

Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 4-5.

Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in this Specific Plan.

Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in this Specific Plan.

Policy 5.4: Designate a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.

Objective 6: Encourage environmentally sustainable development and operational practices.

Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside building code requirements.

Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals.

Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements.

Policy 6.4: Implement sustainability measures that complement and support the City of Riverside Green Action Plan.

Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.

Policy 7.1: Provide opportunities for University/City partnerships for programming of events on campus.

Policy 7.2: Maintain an open-door policy for the community to experience cultural events, competitive sports, conferencing, and other events on campus.

Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research.

Policy 8.1: Strive towards seamless access to information, resources, and services by creating and maintaining a vanguard converged network infrastructure supporting voice, video, and data.

Policy 8.2: Enhance student and faculty access by providing campus-wide wireless coverage.

Policy 8.3: Enrich student experience by leveraging technologies to improve operational efficiencies.

Policy 8.4: Stay abreast of emerging technologies by participating and partnering with relevant organizations in this ever-changing landscape.

CBUSP Amendment Development Plan

In accordance with these objectives and policies, Chapter 3 of the proposed CBUSP Amendment provides a development plan for campus boundary and facility expansions in order to facilitate an increase in student enrollment. The land use plan will ensure CBU is equipped with reconfigured educational, housing, administrative support, athletic, and other facilities to support CBU's goal of 12,000 students by the year 2025 while taking into consideration the campus' relationship and compatibility with surrounding land uses. A single zoning district, the CBU Specific Plan Zone, is established to regulate the land use plan and will include two subareas (CBU SP-1 and CBU SP-2) to regulate uses permitted by right, by Minor Conditional Use Permit (MCUP), by Conditional Use Permit (CUP), or uses not permitted within a specific subarea. While some uses would be permitted in one subarea, they would be conditionally permitted or,

for select uses such as parking structures or outdoor athletic facilities, not permitted in the other subarea (refer to Table 3.C in this EIR and Table 4-1 in the CBUSP). Additionally, both CBU SP-1 and CBU SP-2 have distinct building height, density, and setbacks standards, as set forth in Chapter 4 (*Land Use Regulations and Development Standards*) of the CBUSP Amendment.

CBUSP Amendment Development Standards

Chapter 4 of the proposed CBUSP Amendment provides land use regulations and development standards[9] intend to support the CBUSP Amendment's objectives and policies as they relate to land use compatibility and to:

- Define the permitted land uses within the Specific Plan area;
- Provide design parameters for all development in the Specific Plan area;
- Provide guidance as to the quality and character of individual projects;
- Offer flexibility to accommodate innovative and unique designs, as well as the evolving and dynamic nature of the University's needs;
- Promote design creativity and variation while ensuring consistency in building scale, proportion, and pedestrian orientation, as well as the distinct character of the Mission Revival architectural design influence;
- Create a vibrant environment that complements the surrounding community;
- Provide transitions between the CBU properties and surrounding non-CBU land uses;
- Ensure appropriate sensitivity to adjacent single-family residential neighborhoods; and
- Maintain CBU as a pedestrian-oriented campus.

Table 2.C of this Draft EIR (Table 4-1 in the CBU SP Amendment) identifies the permitted and supportive uses allowed within the CBU Specific Plan Zone. These uses and all similar uses that are directly related to the operations of the University are permitted as a matter of right unless otherwise indicated in Table 2.C, subject to compliance with the development standards and design guidelines contained within the proposed CBUSP Amendment.

CBUSP Amendment Design Guidelines

Chapter 7 of the CBUSP Amendment provides specific design guidelines to guide the architectural, landscape, site furnishing, streetscape, entrance and corner, fence and wall, open space, lighting, signage, and campus art design to ensure a cohesive, aesthetically pleasing, and

[9] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 4, Section A, Subsection 1. City of Riverside. August 2018.

safe campus in accordance with the CBU SP Amendment objectives and policies.[10] These design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*.

Architectural design shall apply to all new construction within the CBU Specific Plan Zone, including modifications to existing structures. New construction and modifications to existing structures will consider the relationship and compatibility of a proposed project with their surroundings through an assessment of the existing site and neighborhood and historic context. To create a consistent aesthetic for the campus, the Yeager Center building, with its architectural style and quality that combine authentic details with contemporary execution, will be used as a base reference for architectural mass, scale, and detail needs to be identified. Prior to the schematic design of any project, a site analysis would be conducted to form the design parameters. Issues such as land use, interface with adjoining uses, visibility of facilities, cultural and historic resources, architectural character, and landscape and streetscape relationships would be considered. As part of context planning, the potential effect of the new edge development projects on the neighborhood and the Magnolia Heritage District would be assessed.

Streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, and Monroe Street will require greater coordination with the City Planning Division and Public Works Department to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements.

CBUSP Amendment Implementation Methods

Chapter 6 (*Implementation*) of the proposed CBU SP Amendment provides methods, programs, and financing mechanisms to be used to implement the objectives, policies, development standards, and design elements in the CBU SP Amendment.[11] CBU serves as the responsible party, meaning the University's Finance and Administration Department or other department as designated by the Finance and Administration Department, and the implementation timeframe shall be ongoing as individual projects are proposed throughout the 2025 horizon of the Specific

[10] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 7, Section B, Subsection 1. City of Riverside. August 2018.

[11] *Ibid.* Pages 123 to 134.

Plan. These implementation methods serve as self-mitigating project design features required for all future development and improvement projects under the CBUSP Amendment.

Administrative Design Review. All development permitted as a matter of right, as listed in Table 2.C of this Draft EIR (Table 4-1 in the CBUSP Amendment), shall be subject to Design Review pursuant to the CBUSP Amendment. Specific minor improvements shall be exempt from further review.

For any use for which a Minor Conditional Use Permit is required, the application for and processing of such permit shall comply with Chapter 19.730 of RMC Title 19 (*Zoning Code*

Approval of Temporary Uses. In addition to uses directly related to the operations of CBU, certain uses not operated by CBU may be permitted within the CBU Specific Plan Zone. Any temporary use or activity within the Specific Plan area shall be permitted to occur without any additional authorization, except for outdoor events if more than 2500 attendees are expected. A Temporary Use Permit shall be obtained pursuant to RMC Section 19.740 (Temporary Use Permit) for a temporary use or activity that requires an electrical permit, health permit, and/or fire permit.

Substantial Conformance Determination for Minor Modifications. A Substantial Conformance Determination for a Minor Modification can be made for any proposed deviation up to 25 percent from the standards and guidelines of this Specific Plan. This can include increases in building height not to exceed 99 feet in CBU SP-1, adjustments to setbacks, and building stepback requirements where adjacent non-CBU properties support uses other than single-family residences. Minor Modifications involve the following changes:

a. Modification of any design element in this Specific Plan that improves circulation, reduces grading, improves drainage, or enhances infrastructure.

b. Minor changes to the architectural or landscape guidelines or sign standards for interior signs.

c. Changes to the internal circulation plan—including alignments, width, or improvements—that do not adversely affect external circulation patterns.

d. Changes in utility and/or public service providers or the location or size of facilities needed to support the approved land use plan.

e. Changes to entry design that are consistent with the development standards and design criteria of this Specific Plan.

f. Refinements to Specific Plan language which increase clarity and do not change policy intent.

Any request for a Substantial Conformance Determination shall be in the form of a letter to the Director describing the proposed deviation from the standards or guidelines of this Specific Plan. Any applicable fees established by resolution of the City Council shall be paid at the time of letter submission. Minor Modifications to the CBU Specific Plan, as defined in subparagraph a, above, shall not require a Specific Plan Amendment. Minor Modifications shall be subject to approval by the Director or his/her designee and shall not require a public hearing or notice.

Within 30 days of receiving the letter and any applicable fees, the Director or his/her designee shall review the proposal for Substantial Conformance with the standards and guidelines of this Specific Plan and shall issue a written determination and findings as to how the proposal complies or does not comply with the provisions of this Specific Plan.

A written record of Substantial Conformance shall be maintained on file with the official copy of the adopted Specific Plan, or the Specific Plan document may be modified.

The Director or his/her designee shall make the following findings:

- The modification is consistent with the intent of the CBUSP; and
- The modification will not produce a result that is out of character or detrimental to the neighborhood.

No public notice and no public hearing shall be required. If the proposal is found to be in substantial conformance, no further action on the part of the Director or the applicant is required.

4.10.5 Environmental Impacts Before Mitigation

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

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

Objective 2 of the CBU SP Amendment proposes to create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping, while Policy 2.1 provides edge and transition standards

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

According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University.[12] For the CBU Specific Plan Zone, the Design Guidelines outlined in the proposed CBUSP Amendment would replace the design guidelines of the *Magnolia Avenue Specific Plan.* However, implementation of the proposed CBUSP Amendment would maintain the established residential character of the Magnolia Heritage District, while allowing for higher intensity pedestrian-oriented residential and mixed-use development on opportunity sites, particularly along Magnolia Avenue. Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage, in accordance with *Magnolia Avenue Specific Plan* Corridor-Wide Objective 2. As detailed in Section 4.10.4 above (Chapter 5 of the CBUSP Amendment), CBU streetscape design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians, bicyclists, and users of other non-motorized modes of transportation, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Diana Avenue and State Route 91, Adams Street, and Monroe Street will require greater coordination with the City and other agencies (e.g., Department of Public Works and Caltrans) to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements. A new dramatic entrance to the campus at Adams Street and Briarwood Drive will connect to Campus Bridge Drive and link the urban mixed uses with the balance of the campus pursuant to CBUSP Amendment Policy 2.2.

[12] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. Adopted November 10, 2009.

The University intends to pursue the eventual vacation of Wilma and Emily Courts, which are cul-de-sac streets branching from Diana Avenue. Over time, CBU may also consider pursuing the vacation of Diana Avenue in tandem with the closure of Diana Avenue at Adams Street, which would involve coordinating with the Public Works Department consistent with the City's Street Vacation process. Although Wilma and Emily Courts would no longer be public streets, they will become private access roads and continue to provide access to the southerly portion of the CBU Specific Plan Zone through build out of the CBUSP Amendment.

Implementation of the CBUSP Amendment would be commensurate with the existing on-campus and surrounding land uses, which are academic, mixed use, and high-density residential in nature, and therefore would integrate uniformly with the established community. All future projects and construction facilitated by the proposed CBUSP Amendment will be required to undergo Planning Staff review and approval to ensure design elements are proposed and implemented in accordance with the development plan (Chapter 3), land use regulations and development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) in support of the objectives and policies of the CBUSP Amendment, as outlined in Section 4.10.4 above. Additionally, the CBUSP Amendment must comply with applicable chapters of Title 19 (*Zoning Code*), as well as the City's *General Plan 2025.*

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

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

The Project proposes an amendment to the 2013 CBUSP to facilitate an anticipated increase in student enrollment from 8,414 total students in 2015 to 12,000 total students by 2025 due to an expansion of curriculum offered at CBU. The proposed CBUSP Amendment encompasses the properties administered under the 2013 CBUSP, plus the College of Health Sciences property at

3532 Monroe Street (APN 233-12-0010) and the former site of the Riverside Christian Elementary School at 3626 Monroe Street (APN 233-11-0045).

The City's *General Plan 2025* Land Use designation for the proposed Project site is CBUSP - California Baptist University Specific Plan (consisting of the 2013 CBUSP Planning Area) and PF-Public Facilities/Institutional for the College of Health Sciences property at 3532 Monroe Street (APN 233-12-0010) and the former site of the Riverside Christian Elementary School at 3626 Monroe Street (APN 233-11-0045).[13] These designations allow for a broad range of educational-related activities requiring large areas of land with convenient access for commuters utilizing various modes of transportation (i.e. automobiles, bicycles, pedestrian, and mass transit). Permitted uses include academic (including student housing), administrative, athletic, office, services, and commercial uses designed to foster a positive relationship between CBU and the larger community in which it resides.

The proposed project includes an amendment to the City's *General Plan 2025* to change the PF-Public Facilities/Institutional land use designation to CBUSP - California Baptist University Specific Plan at the CBU College of Health Sciences at 3532 Monroe Street (APN 233-12-0010) and at the former site of the Riverside Christian Elementary School at 3626 Monroe Street (APN 233-11-0045) (Figure 2-2). The proposed change in land use designation requiring an amendment to the City's *General Plan 2025* does not constitute a significant impact because the proposed uses of these facilities remain institutional and academic in nature. Implementation of the CBUSP Amendment would facilitate a streamlined development pattern integrating these facilities into the greater CBU campus with a cohesive and unified architectural, landscape, and circulation typology. Therefore, the proposed Project would have **no impact** to the environment from the proposed change in land use designation requiring an amendment to the City's *General Plan 2025*.

According to City Zoning, the proposed Project site is zoned CBUSP - California Baptist University Specific Plan, divided into five unique Planning Areas (Mixed Use/Academic, Mixed Use/Residential, Mixed Use/Urban, Athletics, and Open Space), and Single Family Residential (R-1-7000) within the *Magnolia Avenue Specific Plan* (Magnolia Heritage District) Overlay Zone for the CBU College of Health Sciences at 3532 Monroe Street (APN 233-12-0010) and at the former site of the Riverside Christina Elementary School at 3626 Monroe Street (APN 233-11-0045) (Figure 2-3). The CBUSP Amendment proposes a rezone for both the CBUSP - California Baptist University Specific Plan, as well as for the CBU College of Health Sciences and the former site of the Riverside Christian Elementary School (APN 233-12-0010 and APN 233-11-0045.).

[13] *Land Use/Urban Design Element, Riverside General Plan 2025*. Figure LU-10. City of Riverside. 2007, Amended March 2013.

A single zoning district, the CBU Specific Plan Zone, is established to regulate the land use plan and will include two subareas (CBU SP-1 and CBU SP-2) to regulate uses permitted by right, by Minor Conditional Use Permit (MCUP), by Conditional Use Permit (CUP), or uses not permitted within a specific subarea (Figure 1-3). While some uses would be permitted in one subarea, they would be conditionally permitted or, for select uses such as parking structures or outdoor athletic facilities, not permitted in the other subarea (refer to Table 3.C in this EIR and Table 4-1 in the CBUSP). The CBUSP Amendment will replace the five unique Planning Areas (Mixed Use/Academic, Mixed Use/Residential, Mixed Use/Urban, Athletics, and Open Space) of the 2013 CBUSP with the CBU Specific Plan Zone and change APN 233-12-0010 and APN 233-11-0045 from Single Family Residential (R-1-7000) to CBUSP - California Baptist University Specific Plan. Additionally, both APN 233-12-0010 and APN 233-11-0045 would be rescinded from the *Magnolia Avenue Specific Plan* and be incorporated into the CBU Specific Plan Zone to accommodate the proposed boundaries of the expanded CBU Campus (Figure 2-4).

CBUSP-1 and CBUSP-2 each have distinct building height, density, and setbacks standards, as set forth in Chapter 4 (*Land Use Regulations and Development Standards*) of the CBUSP Amendment. Table 2.C of this Draft EIR (Table 4-1 in the CBUSP Amendment) identifies the permitted and supportive uses allowed within the CBU Specific Plan Zone. These uses and all similar uses that are directly related to the operations of the University are permitted as a matter of right unless otherwise indicated in Table 2-3, subject to compliance with the development standards and design guidelines contained within the proposed CBUSP Amendment. The proposed CBU Specific Plan Zone replace the five unique Planning Areas (Mixed Use/Academic, Mixed Use/Residential, Mixed Use/Urban, Athletics, and Open Space) of the existing 2013 CBUSP to facilitate a more urban-style development pattern, but the objectives and policies proposed in the CBUSP Amendment mirror those under which CBU development is currently administered. Additionally, since the CBU College of Health Sciences at 3532 Monroe Street (APN 233-12-0010) and at the former site of the Riverside Christian Elementary School at 3626 Monroe Street (APN 233-11-0045) already serve as educational/institutional uses instead of residential uses as currently zoned, the proposed Project would have **no impact** to the environment from a zone change from Single Family Residential (R-1-7000) to CBUSP - California Baptist University Specific Plan for APN 233-12-0010 and APN 233-11-0045.

The *Magnolia Avenue Specific Plan* and the CBUSP Amendment will continue to abut each other and be implemented complimentarily without conflict. As stated previously, implementation of the CBUSP Amendment on APN 233-12-0010 and APN 233-11-0045 would facilitate a streamlined development pattern integrating these facilities into the greater CBU campus with a cohesive and unified architectural, landscape, and circulation typology which would complement the *Magnolia Avenue Specific Plan.* In fact, many of the objectives and policies of the *Magnolia Avenue Specific Plan* would be adopted and implemented by the CBUSP Amendment.

According to the *Magnolia Avenue Specific Plan*, the Magnolia Heritage District is one of the two oldest communities, the other being Arlington Village, located along the original Magnolia Avenue Corridor.[14] According to the 2013 CBUSP, CBU campus core frontage along the Magnolia Heritage District consists of mixed use/academic, mixed use/residential, athletics, and open space.[15] Properties within the Magnolia Heritage District and surrounding the CBU campus core consist primarily of schools, multi-family housing, some single-family housing, and commercial retail uses. According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University.[16]

Implementation of the proposed CBUSP Amendment is designed to establish a framework for a more urban-style development pattern while maintaining the aesthetic and historical nature of the Magnolia Heritage District; it does not involve construction of new buildings or a specific project which may impact the aesthetic qualities of Magnolia Avenue or the Magnolia Heritage District. On the contrary, CBU is a major contributor to the historic fabric of Magnolia Avenue, as the Campus boasts several facilities dating to the late 19th or early 20th Centuries which contribute to the historic nature of the Magnolia Heritage District. Accordingly, the proposed CBUSP Amendment includes several objectives and policies designed to guide design elements of future projects subject to compliance with the proposed CBUSP Amendment to ensure a cohesive and unified architectural, landscape, and circulation typology for the entire CBU Specific Plan Zone.

Pursuant to California Government Code Section 65450 et seq., and RMC 19.820 (*Specific Plan/Specific Plan Amendments*), Specific Plans provide detailed land use and infrastructure plans and policies for a certain geographic area and must be consistent with an applicable General Plan. Table 4.10-A demonstrates the proposed project's consistency with the City's *General Plan 2025*. Additionally, Table 4.10-B demonstrates the proposed Project's consistency with the *Magnolia Avenue Specific Plan*. Where applicable, the proposed project's consistency with SCAG's (a) Regional Comprehensive Plan (RCP); (b) Regional Transportation Plan (RTP); and (c) Sustainable Communities Strategy (SCS) Plan related to the RTP also are discussed below.

[14] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. November 10, 2009.
[15] *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Figure 4-1. Page 36. City of Riverside. Adopted March 26, 2013.
[16] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. November 10, 2009.

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Land Use Element	
Objective LU-8: Emphasize smart growth principles through all steps of the land development process. **Policy LU-8.1** Ensure well-planned infill development Citywide, allow for increased density in selected areas along established transportation corridors. **Policy LU-8.2** Avoid density increases or intrusion of non-residential uses that are incompatible with existing neighborhoods. **Policy LU-8.4** Ensure that in-fill development and development along Magnolia and University Avenues incorporate the latest Smart Growth principals.	**Consistent.** The CBU Specific Plan, as amended, proposes a framework to guide development of campus boundary and facility expansions under a more urban-style development pattern in order to further strengthen the campus identity of a quality academic institution with historic roots to the community. Development will be proposed and guided within already urbanized parts of the City, utilizing existing facilities and infrastructure to promote pedestrian, bicycle, and transit-oriented mobility. Policy 2.1 of the CBUSP Amendment proposes to provide edge and transition standards that respect the scale and character of the campus/community interface in accordance with the development standards and design guidelines outlined herein. Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major-use corridor and attractive boulevard along the campus frontage. The interface between the CBU Specific Plan Zone and Magnolia Avenue is lined with street trees and maintains a minimum of 46 feet of structure setback. Additionally, the Magnolia Lawn within the CBU Campus Zone features heritage trees on approximately 6.7 acres of green space frontage along Magnolia Avenue. All future development administered by CBU would be subject to Design Review by Planning Staff to ensure design elements are proposed and implemented in accordance with the objectives and policies of the CBUSP Amendment, the Riverside *General Plan 2025*, and applicable RMC prior to permit issuance.
Objective LU-11 Create a network of parkways to establish stronger linkages between Riverside's neighborhoods, major elements of its natural environment and neighborhood parks and schools. **Policy LU-11.1** Recognize parkways as distinctive elements of the City's circulation network. **Policy LU-11.3** Seek opportunities to provide enhanced bicycle and pedestrian usage along parkways through the development process.	**Consistent.** Policy 2.3 of the CBUSP Amendment requires design of the Magnolia Avenue Corridor to be a pedestrian-oriented mixed-use boulevard along the campus frontage. The proposed streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
	inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, and Monroe Street will require greater coordination with the City Planning Division and Public Works Department to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements.
Objective LU-12 Restore the Magnolia/Market Corridor to its historical role as a scenic "showcase roadway" that spans the City of Riverside while updating its function as a key transit corridor to support future growth (Also Magnolia Avenue [Corridor-Wide] Specific Plan Objective 1). **Policy LU-12.1** Through the Specific Plan process further implement the earlier Polizoides Plan for the corridor, identify appropriate land uses, development opportunities and streetscape improvements along the Corridor that support the vision as a scenic roadway with distinct districts. Reinforce the desired land uses within the context of each district through development provisions and regulations (Also Magnolia Avenue [Corridor-Wide] Specific Plan Policy 1.1). **Policy LU-12.2** Maintain the existing mature heritage landscaping and infill landscaping as appropriate to return the Corridor to being a grand tree-lined parkway (Also Magnolia Avenue [Corridor-Wide] Specific Plan Policy 1.2). **LU-12.4** Expand and update the function of the Magnolia/Market Corridor as a key transit corridor to accommodate growth.	**Consistent:** Policy 2.1 of the CBUSP Amendment provides edge and transition standards that respect the character of the campus/community interface in accordance with the development standards outlined herein. The street frontage along the south side of Magnolia Avenue shall consist of a combination public realm/private realm landscaped and pedestrian area. The public realm will consist of a minimum 21-foot wide parkway and 5-foot wide sidewalk. A 20-foot landscaped setback (measured from the property line) will be provided along the Magnolia Avenue frontage. No new buildings, opaque fences, or walls (other than monumentation walls) shall be placed within the 20-foot landscaped area except as authorized by the Community and Economic Development Director through a Minor Modification process. The street frontage on the north side of Magnolia Avenue shall consist of a combination public realm/private realm landscaped and pedestrian area. The public realm will consist of a minimum 26-foot right of way. A 20-foot landscaped setback will be provided on private properties. No new buildings, opaque fences, or walls shall be placed within the 20-foot landscaped area. However, existing buildings may remain within the landscaped setback area. Key features will include dense, attractive landscaping, uniform high-quality fencing materials, strong architectural design, a comprehensive sign program, and attractive campus gateways. Policy 5.2 of the CBUSP Amendment provides design guidance to ensure that new buildings are architecturally compatible with the existing

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
	historical campus architecture. Policy 5.1 of the CBUSP Amendment encourages the preservation of existing significant historical structures within the CBU Specific Plan Zone through rehabilitation, adaptive use, and relocation. New development on campus will be designed to respect historic context and will not erode, degrade, or diminish the individual qualities and defining characteristics of any historic resource on the project site and surrounding neighborhoods, or the integrity of the Magnolia Heritage District. Federally and locally designated cultural resources within the Specific Plan area have been evaluated for historic significance, and treatment for each resource is outlined in Table 4.5-A, *Disposition of Properties Surveyed for Historical Significance*, of this Draft EIR. Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage. Future circulation on the main campus has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. Bicycle circulation will continue to share these routes. The original main entry to the CBU campus from Magnolia Avenue will continue to provide key access to the campus. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic on the local road network.
Objective LU-22 Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port, Riverside Municipal and Flabob Airports. **Policy LU-22.2:** Work cooperatively with the Riverside	**Consistent:** The CBUSP Amendment is proposed within Compatibility Zone D (*Primary Traffic Patterns and Runway Buffer Area*) and Compatibility Zone E (*Other Airport Environs*) of the ALUCP, so the Riverside County Airport Land Use Commission would review the proposed

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
County Airport Land Use Commission in developing, defining, implementing and protecting airport influence zones around the MARB/MIP, Riverside Municipal, and Flabob Airports and in implementing the new Airport Land Use Compatibility Plan. **Policy LU-22.3:** Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise. **Policy LU-22.4:** Adopt and utilize an Airport Protection Overlay Zone and the Riverside County Airport Land Use Compatibility Plan as it affects lands within the City of Riverside. **Policy LU-22.5:** Review all proposed projects within the airport influence areas of Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport as noted on Figure PS-6 – Airport Safety Zones and Influence Areas for consistency with all applicable airport land use compatibility plan policies adopted by the Riverside County Airport Land Use Commission (ALUC) and the City of Riverside, to the fullest extent the City finds feasible. **Policy LU-22.7:** Prior to the adoption or amendment of the General Plan or any specific plan, zoning ordinance or building regulation affecting land within the airport influence areas of the airport land use compatibility plan for Riverside Municipal Airport, Flabob Airport or March Air Reserve Base/Inland Port Airport, refer such proposed actions for determination and processing by the ALUC as provided by Public Utilities Code Section 21670. **Policy LU-22.9:** All development proposals within an airport influence area and subject to ALUC review will also be submitted to the manager of the affected airport for comment.	CBUSP Amendment for compliance with the ALUCP pursuant to California Public Utilities Code Section 21676. Project-specific conditions imposed by the ALUCP would be implemented, as applicable, through **Mitigation Measure (MM) HAZ-3** so that all future development facilitated under the CBUSP Amendment within Compatibility Zone D and Compatibility Zone E would occur in accordance with the ALUCP.
Objective LU-27 Enhance, maintain, and grow Riverside's inventory of street trees. **Policy LU-27.1:** Require appropriately sized landscaped parkways in all new development. Parkway areas shall be of sufficient width to allow planting of trees that will become large canopy trees.	**Consistent:** For any future development within the CBU Specific Plan Zone, edge effects to existing off-site landscaping would be addressed in accordance with Chapter 5 (*Design Guidelines*) of the CBUSP Amendment. For example, a continuation of CBU's picturesque, park-like campus setting is required, and all landscaping near

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Policy LU-27.2: Utilize neighborhood and expert input to develop and periodically update a palette of acceptable street tree species structured around Riverside's natural environment and its neighborhoods. **Policy LU-27.4:** Encourage trees on private property to add to the City's urban forest.	Magnolia Avenue, Adams Street, and Monroe Avenue would be designed to reinforce visual and thematic connections to the landscaping along these streets. The boundaries of the CBU Specific Plan Zone along Magnolia Avenue, Adams Street, Monroe Street, and Diana Avenue/SR-91 would be treated with recurring plant materials to visually unify the campus, while being mindful of the surrounding neighborhoods. If implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual.**:**
Objective LU-29 Minimize the visual impact of aerial facilities on the City's landscape.	**Consistent:** All future development administered by CBU will be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the objectives and policies of the CBUSP Amendment, the *General Plan 2025*, and applicable provisions of the RMC prior to permit issuance. Generally, taller buildings and structures are encouraged to be placed at the center of the CBU campus. Buildings will step down in height toward the campus edges (along public streets,) and, in particular, buildings along the edges will be of a scale and mass that are compatible with buildings on adjacent non-University properties. According to Riverside Municipal Code Chapter 19.590.070(B) (*Light and Glare*), stadium and playing field lighting height is not restricted to the maximum permitted building height of the zone where such lights are located. Therefore, athletic field lighting within the CBU Specific Plan Zone will be subject to height standards administered by the ALUCP.
Objective LU-78 Maintain Ramona's established residential character while allowing for higher-intensity, transit-oriented residential and mixed residential-commercial development on opportunity sites, particularly along Magnolia and California Avenues.	**Consistent.** Implementation of the proposed CBUSP Amendment is designed to establish a framework for a more urban-style development schema pattern while maintaining the aesthetic and historical nature of the Magnolia Heritage District; it does not involve construction of new buildings or

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Policy LU-78.1: Improve and expand the housing stock to support and complement the major educational institutions and bus rapid transit. **Policy LU-78.2** Preserve historic landscaping and increase green space along the Magnolia Corridor (Also Magnolia Avenue [Heritage District] Specific Plan Policy 1.2). **Policy LU-78.3** Encourage continued enhancement and growth of the significant institutional uses along the Magnolia Corridor. **Policy LU-78.6:** Require large-scale development along block faces of Magnolia Avenue that are designated Very High Density Residential (VHDR). Ensure that resulting development is sensitive to surrounding uses.	a specific project which may impact the aesthetic qualities of Magnolia Avenue or the Magnolia Heritage District. On the contrary, CBU is a major contributor to the historic fabric of Magnolia Avenue, as the Campus boasts several facilities dating to the late 19th or early 20th Centuries which contribute to the historic nature of the Magnolia Heritage District. Accordingly, the proposed CBUSP Amendment includes design elements to be implemented during execution of future projects subject to compliance with the Plan to ensure a cohesive and unified architectural, landscape, and circulation typology. Policy 2.1 of the CBU Specific Plan, as amended, proposes to provide edge and transition standards that respect the character of the campus/community interface in accordance with the development standards outlined herein and the *Citywide Design Guidelines and Sign Guidelines*. Landscape buffers and gateway treatments will provide visuals cues that differentiate the campus from surrounding areas. Buffers can coincide with existing and planned green spaces. Larger open spaces will be located on an axis connecting the Magnolia Lawn/water quality basin, and athletic fields. These open spaces will be augmented by landscape buffers along Magnolia Avenue and Monroe Street. Additional plazas will be located in the interior portion of campus to create a strong campus identity. New development on campus will be designed to respect historic context and will not erode, degrade, or diminish the individual qualities and defining characteristics of any historic resource on the project site and surrounding neighborhoods, or the integrity of the Magnolia Heritage District. Federally and locally designated cultural resources within the Specific Plan area have been evaluated for historic significance, and treatment for each resource is outlined in Table 4.5-A, *Disposition of Properties Surveyed for Historical Significance*, of this Draft EIR. Policy 2.3 of the CBUSP Amendment proposes to maintain the established residential character of the Magnolia Heritage District, while allowing for

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
	higher intensity pedestrian-oriented mixed-use development on opportunity sites, particularly along Magnolia Avenue.
Circulation and Community Mobility Element	
Objective CCM-2 Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development. **Policy CCM-2.2:** Balance the need for free traffic flow with economic realities and environmental and aesthetic considerations, such that streets are designed to handle normal traffic flows with tolerances to allow for potential short-term delays at peak-flow hours. **Policy CCM-2.3:** Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis. **Policy CCM-2.4:** Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles. **Policy CCM-2.7:** Limit driveway and local street access on Arterial Streets to maintain a desired quality of traffic flow. Wherever possible, consolidate driveways and implement access controls during redevelopment of adjacent parcels. **Policy CCM-2.8:** Design street improvements considering the effect on aesthetic character and livability of residential neighborhoods, along with traffic engineering criteria. **Policy CCM-2.9:** Design all street improvement projects in a comprehensive fashion to include consideration of street trees, pedestrian walkways, bicycle lanes, equestrian pathways, signing, lighting, noise and air quality wherever any of these factors are applicable. **Policy CCM-2.10:** Emphasize the landscaping of parkways and boulevards.	**Consistent.** Streetscape design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians, bicyclists, and users of other non-motorized modes of transportation, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Diana Avenue and State Route 91, Adams Street, and Monroe Street will require greater coordination with the City and other agencies (e.g., Department of Public Works and Caltrans) to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements. A new dramatic entrance to the campus at Adams Street and Briarwood Drive will connect to Campus Bridge Drive and link the urban mixed uses with the balance of the campus pursuant to CBUSP Amendment Policy 2.2. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic on the local road network. Policy 4.1 of the CBUSP Amendment strives to ensure consistency with City of Riverside street standards regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus in order to integrate uniformly with the surrounding community. Future circulation to and within the CBU Specific Plan Zone will be designed to accommodate all modes of mobility and the demands of projected

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
	student enrollment. Linkages within the main campus and from the surrounding community will be strengthened, and pedestrian pathways will continue to be distinct as CBU enhances campus walkability and security. Additionally, landscape design and plantings shall complement existing surrounding landscape materials. As the need for additional CBU facilities arises, so they would be planned, designed, constructed, and operated in accordance with Chapter 4 (*Land Use Regulations and Development Standards*) and Chapter 5 (*Design Guidelines*) of the CBUSP Amendment to ensure a cohesive and unified architectural, landscape, and circulation typology. If implementation of the CBUSP Amendment would affect trees within the City's right-of-way, coordination with the City Public Works Department would be necessary to ensure that any and all landscape improvements within public rights-of-way conform to established City standards pursuant to the Urban Forestry Policy Manual.
Objective CCM-3 Design the Magnolia Avenue/Market Street Corridor as a transit- and pedestrian-oriented Mixed Use boulevard. **Policy CCM-3.2:** Consider the implementation of off-street shared parking with parking signage improvements, consolidation of driveways, installation of raised landscaped medians, bus turnouts, traffic signal enhancements, special pavement treatments at pedestrian crossings and intersections, curb extensions, signalized/enhanced crosswalks, wider sidewalks and other appropriate measures which enhance traffic flow, transit efficiency and pedestrian movements. **Policy CCM-3.3:** Upgrade and improve bottlenecks at key intersections (as determined based on need) via the addition of turn-out lanes, with transition back to the original number of lanes at the mid-block as feasible. This can be accomplished using transportation funds, including developer fees, TUMF funds, grants and CIP funding. **Policy CCM-3.4:** Seek opportunities to enhance mobility on parallel and connecting Arterial and Collector Streets in the Magnolia/Market corridor to relieve congestion and to allow for implementation of the mixed-use corridor plan. These could include changes to traffic control (stop signs and traffic signals),	**Consistent.** Policy 2.3 of the CBUSP Amendment proposes to design the Magnolia Avenue Corridor as a pedestrian-oriented mixed-use boulevard along the campus frontage. Future circulation on the main campus has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. Bicycle circulation will continue to share these routes. The original main entry to the CBU campus from Magnolia Avenue will continue to provide key access to the campus. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic on the local road network. Policy 2.1 of the CBUSP Amendment provides edge and transition standards that respect the character of

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
elimination of cross-gutters, parking removal, driveway consolidation or limited roadway widening where feasible. **Policy CCM-3.5:** Apply neighborhood traffic control measures as warranted on the parallel local residential streets to limit cut-through, non-local traffic.	the campus/community interface in accordance with the development standards outlined herein and the *Citywide Design Guidelines and Sign Guidelines*. The street frontage along the south side of Magnolia Avenue shall consist of a combination public realm/private realm landscaped and pedestrian area. The public realm will consist of a minimum 21-foot wide parkway and 5-foot wide sidewalk. A 20-foot landscaped setback (measured from the property line) will be provided along the Magnolia Avenue frontage. No new buildings, opaque fences, or walls (other than monumentation walls) shall be placed within the 20-foot landscaped area except as authorized by the Community and Economic Development Director through a Minor Modification process. The street frontage on the north side of Magnolia Avenue shall consist of a combination public realm/private realm landscaped and pedestrian area. The public realm will consist of a minimum 26-foot right of way. A 20-foot landscaped setback will be provided on private properties. No new buildings, opaque fences, or walls shall be placed within the 20-foot landscaped area. However, existing buildings may remain within the landscaped setback area. Key features will include dense, attractive landscaping, uniform high-quality fencing materials, strong architectural design, a comprehensive sign program, and attractive campus gateways.
Objective CCM-9 Promote and support an efficient public multi-modal transportation network that connects activity centers in Riverside to each other and to the region. **Policy CCM-9.1:** Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors. **Policy CCM-9.5:** Incorporate facilities for transit and other alternative modes of transportation, such as park-and-ride lots and bus turnouts, in the design of future developments. **Policy CCM-9.6:** Enhance and encourage the provision of attractive and appropriate transit amenities, including shaded bus stops, to facilitate use of public	**Consistent:** Riverside Transit Agency currently provides bus service to the project site; the Gold Line, RapidLink, and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site, which support the City's General Plan objectives and policies related to alternative modes of transportation. Policy 2.3 of the CBUSP Amendment proposes to design the Magnolia Avenue Corridor as a pedestrian-oriented mixed-use boulevard along the campus frontage. Because the Project site is located in close proximity to an existing bus route, the proposed project would be accessible to existing transit systems. Policies, plans, and/or programs supporting alternative transportation would be reviewed through the City's

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
transportation, through the development process by incorporating the necessary design features as appropriate. **Policy CCM-9.7:** Ensure adequate connections among all alternative modes. **Policy CCM-9.8:** Preserve options for future transit use where appropriate when designing improvements for roadways.	project review process and incorporated as applicable.
Objective CCM-10 Provide an extensive and regionally linked public bicycle, pedestrian and equestrian trails system. **Policy CCM-10.1:** Ensure the provision of bicycle facilities consistent with the Bicycle Master Plan. **Policy CCM-10.2:** Incorporate bicycle and pedestrian trails and bicycle racks in future development projects. **Policy CCM-10.3:** Provide properly designed pedestrian facilities for the disabled and senior population to ensure their safety and enhanced mobility as users of streets, roads and highways emphasizing "complete streets" principles. **Policy CCM-10.6:** Encourage pedestrian travel through the creation of sidewalks and street crossings. **Policy CCM-10.7:** Maintain an extensive trails network that supports bicycles, pedestrians and horses and is linked to the trails systems of adjacent jurisdictions. **Policy CCM-10.8:** Maximize links between trails and major activity centers, residential neighborhoods, schools, shopping centers and employment centers. **Policy CCM-10.12:** Encourage bicycling as a commute mode to school, work, etc.	**Consistent:** Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage, while Policy 4.2 shall provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus. The proposed streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, and Monroe Street will require greater coordination with the City Planning Division and Public Works Department to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements. The Project proposes sidewalks, bicycle/walking corridors, and landscaping treatments to provide for pedestrian and bicycle access throughout the Project site. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity.
Housing Element	
Objective H-2 To provide adequate diversity in housing types and affordability levels to accommodate housing needs of Riverside residents, encourage economic development	**Consistent:** The existing student housing consists of studio apartments, one-bedroom apartments, two-bedroom apartments, and townhomes. The proposed Project would result in the development of

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
and sustainability, and promote an inclusive community. **Policy H-2.2:** *Smart Growth.* Encourage the production and concentration of quality mixed-use and high density housing along major corridors and infill sites throughout the City in accordance with smart growth principles articulated in the General Plan. **Policy H-2.3:** *Housing Design.* Require excellence in the design of housing through the use of materials and colors, building treatments, landscaping, open space, parking, sustainable concepts, and environmentally sensitive building and design practices. **Policy H-2.4:** *Housing Diversity.* Provide development standards and incentives to facilitate live-work housing, mixed-use projects, accessory dwellings, student housing, and other housing types.	additional student housing in close proximity to existing roadways, commercial, and industrial areas. In addition, the Project proposes sidewalks, bicycle/walking corridors, and landscaping treatments to provide for pedestrian and bicycle access throughout the Project site. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, and CBU's policy that every traditional student must live on campus until the age of 21 further limits the need for vehicle travel. New construction and modifications to existing student housing will consider relationship and compatibility with surroundings through an assessment of the existing site and neighborhood and historic context. To create a consistent aesthetic for the campus, the Yeager Center building, with its architectural style and quality that combine authentic details with contemporary execution, will be used as a base reference for architectural mass, scale, and detail needs to be identified. Prior to the schematic design of any project, a site analysis would be conducted to form the design parameters. Issues such as land use, interface with adjoining uses, visibility of facilities, cultural and historic resources, architectural character, and landscape and streetscape relationships will be considered. As part of context planning, the potential effect of the new edge development projects on the neighborhood and the *Magnolia Heritage District* will be assessed for projects along the perimeter of the Campus Zone that neighbor adjacent land uses.
Public Safety Element	
Objective PS-5 Provide safe pedestrian and bicyclist environments Citywide. **Policy PS-5.1:** Enhance and maintain pedestrian safety through the inclusion of well-designed streets, sidewalks, crosswalks, traffic control devices and school routes throughout the City. Reasonable means of pedestrian accessibility shall be an important consideration in the approval of new development. **Policy PS-5.2:** Develop objectives and detailed standards and guidelines for the treatment of public streetscapes to improve safety and walkability. Recommendations should address street trees, street	**Consistent:** Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage, while Policy 4.2 shall provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus. The proposed streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments.

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
lighting, street furniture, traffic calming and other pertinent issues. Establish funding sources and priorities and set forth a phased improvement program. **Policy PS-5.3:** Prioritize locations for potential pedestrian safety enhancements, including modified signage, lighted crosswalks and other similar facilities. **Policy PS-5.4:** Require that new development provide adequate safety lighting in pedestrian areas and parking lots.	To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, and Monroe Street will require greater coordination with the City Planning Division and Public Works Department to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements. The Project proposes sidewalks, bicycle/walking corridors, and landscaping treatments to provide for pedestrian and bicycle access throughout the Project site. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity.
Objective PS-6 Protect property in urbanized and nonurbanized areas from fire hazards. **Policy PS-6.3 :** Integrate fire safety considerations in the planning process. **Policy PS-6.5 :** Mitigate existing fire hazards related to urban development or patterns of urban development as they are identified and as resources permit. **Policy PS-6.10 :** Identify noncontiguous streets and other barriers to rapid response and pursue measures to eliminate the barriers.	**Consistent:** The proposed Project will comply with RMC Chapter 16.32 (*Fire Prevention*) and Chapter 16.52 (*Development Fees for Fire Stations*) to reduce the risk of fire hazards. Additionally, proposed potable water infrastructure shall be designed to accommodate fire-fighting water pressure standards. Development implemented under the proposed CBUSP Amendment shall occur in accordance with all applicable requirements of the CCR, Title 24 (also known as the California Building Standards Code or the California Building Code) and Title 16, *Buildings and Construction,* of the RMC in effect at the time of construction. Future circulation on the main campus has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. The original main entry to the CBU campus from Magnolia Avenue will continue to provide key access to the campus.

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Objective PS-10 Improve the community's ability to respond effectively to emergencies. **Policy PS-10.3 :** Ensure that public safety infrastructure and staff resources keep pace with new development planned or proposed in Riverside and the Sphere of Influence. **Policy PS-10.4 :** Continue to ensure that each development or neighborhood in the City has adequate emergency ingress and egress, and review neighborhood access needs to solve problems, if possible. **Policy PS-10.5:** Coordinate with local agencies and organizations to educate all residents and businesses to take appropriate action to safeguard life and property during and immediately after emergencies.	**Consistent:** CBU maintains its Department of Safety Services to enhance the safety and security of the CBU community. The department assists with the protection of students, employees, and property. The Department of Safety Services provides 24-hour assistance to the campus community, and all areas of the campus are regularly patrolled. Safety Services also assumes an educational role by teaching members of the CBU community to support one another and to be vigilant of their surroundings. Future circulation on the main campus has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. The original main entry to the CBU campus from Magnolia Avenue will continue to provide key access to the campus.
Objective PS-11 Preserve the historic and archaeological resources of the City from demolition, destruction, and/or severe damage in the event of natural and human-caused disasters, hazards, and/or other emergency events. **Policy PS-11.1:** Protect resources listed in the Historical Resources Inventory from premature or inadvertent demolition and encourage retrofitting of these resources to protect them from damage caused by a disaster episode. **Policy PS-11.2:** Take reasonable steps to prevent the loss of historic building without endangering public safety or contributing to additional property damage. **Policy PS-11.3:** Preserve sensitive and significant archaeological, cultural and historic resources by maintaining coordination between Riverside's Emergency Management Office, the Eastern Information Center (EIC) at the University of California, Riverside (UCR) and Native American Tribes identified by the Native American Heritage Commission (NAHC) to obtain area specific information related to sensitive resources during natural and human-caused disasters, hazards and/or other	**Consistent:** Policy 5.2 of the CBUSP Amendment provides design guidance to ensure that new buildings are architecturally compatible with the existing historical campus architecture. Policy 5.1 of the CBUSP Amendment encourages the preservation of existing significant historical structures within the CBU Specific Plan Zone through rehabilitation, adaptive use, and relocation. New development on campus will be designed to respect historic context and will not erode, degrade, or diminish the individual qualities and defining characteristics of any historic resource on the project site and surrounding neighborhoods, or the integrity of the Magnolia Heritage District. Federally and locally designated cultural resources within the Specific Plan area have been evaluated for historic significance. Treatment for each resource as outlined in Table 4.5-A, *Disposition of Properties Surveyed for Historical Significance*, of this Draft EIR and implementation of **MM CUL-1** through **MM CUL-3,** would ensure appropriate management of cultural resources in the event they are threatened by natural and human-caused

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
emergency events.	disasters, hazards, and/or other emergency events.
Noise Element	
Objective N-1 Minimize noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment. **Policy N-1.1:** Continue to enforce noise abatement and control measures particularly within residential neighborhoods. **Policy N-1.2:** Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code. **Policy N-1.3:** Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized. **Policy N-1.4:** Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas. **Policy N-1.5:** Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas. **Policy N-1.7 :** Evaluate noise impacts from roadway improvement projects by using the City's Acoustical Assessment Procedure. **Policy N-1.8 :** Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.	**Consistent:** The proposed Project shall be designed and implemented to comply with RMC Title 7 (*Noise Control*) with regard to stationary noise, mobile noise, and other temporary noise emanating from athletic and special events. Any mechanical equipment placed within sensitive receptors shall be shielded to achieve compliance with RMC Title 7 (*Noise Control*). Parking structures shall be designed and sited in a manner that minimizes noise impacts on adjacent properties not part of the CBU campus. Considerations shall include locations of ingress/egress, providing solid walls along the sides of the structure that café non-CBU properties, and use of surfacing materials that minimize tire noise. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic noise on the surrounding communities.
Objective N-2 Minimize the adverse effects of airport-related noise through proper land use planning. **Policy N-2.1:** Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Figure N–10 – Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions. **Policy N-2.2:** Avoid placing noise-sensitive land uses	**Consistent:** The CBUSP Amendment is proposed within Compatibility Zone D (*Primary Traffic Patterns and Runway Buffer Area*) and Compatibility Zone E (*Other Airport Environs*) of the ALUCP, so the Riverside County Airport Land Use Commission would review the proposed CBUSP Amendment for compliance with the ALUCP pursuant to California Public Utilities Code Section 21676. Project-specific conditions imposed by the ALUCP would be implemented, as applicable, through **MM HAZ-3** so that all future

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
(e.g., residential uses, hospitals, assisted living facilities, group homes, schools, day care centers, etc.) within the high noise impact areas (over 60 dB CNEL) for Riverside Municipal Airport and Flabob Airport in accordance with the Riverside County Airport Land Use Compatibility Plan. **Policy N-2.5:** Utilize the Airport Protection Overlay Zone, as appropriate, to advise landowners of special noise considerations associated with their development.	development facilitated under the CBUSP Amendment within Compatibility Zone D and Compatibility Zone E would occur in accordance with the ALUCP
Objective N-4 Minimize ground transportation-related noise impacts. **Policy N-4.1 :** Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (i.e., earthen berms, landscaped walls, lowered streets, improved technology). **Policy N-4.5 :** Use speed limit controls on local streets as appropriate to minimize vehicle traffic noise.	**Consistent:** The proposed Project shall be designed and implemented to comply with RMC Title 7 (*Noise Control*). Parking structures shall be designed and sited in a manner that minimizes noise impacts on adjacent properties not part of the CBU campus. Considerations shall include locations of ingress/egress, providing solid walls along the sides of the structure that café non-CBU properties, and use of surfacing materials that minimize tire noise. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic noise on the surrounding communities.
Open Space and Conservation Element	
Objective OS-1 Preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses. **Policy OS-1.5:** Require the provision of open space linkages between development projects, consistent with the provisions of the Trails Master Plan, Open Space Plan and other environmental considerations including the MSHCP (Multiple Species Habitat Conservation Plan). **Policy OS-1.6:** Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections.	**Consistent:** Campus open spaces include the network of plazas, courtyards, and public green spaces such as Magnolia Lawn, the water quality basin, Stamps Courtyard at the Yeager Center, Harden Square at the James Building, Annie Gabriel/Wallace Building Commons, the Brisco's courtyards, and residence courtyards in University Place. Landscape plans will meet the landscaping requirements described in Chapter 5 of the CBUSP Amendment and will be reviewed at the time of Site Plan and Design Review by the City (as applicable). The perimeter of the campus will have a formalized landscape treatment that unifies the contiguous campus boundaries. The treatment will vary to accommodate existing structures and planned development. A landscaped buffer treatment will be provided around all parking structures to soften the impact of the structure. Landscaped treatments

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
	within parking lots will include islands and tree wells to ease vehicular and pedestrian circulation and to provide shade. Linkages within the main campus and from the surrounding community will be strengthened, and pedestrian pathways will continue to be distinct as the University enhances the campus walkability and security. The proposed streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments.
Objective OS-8 Encourage the efficient use of energy resources by residential and commercial users. **Policy OS-8.1:** Support the development and use of non-polluting, renewable energy sources. **Policy OS-8.2:** Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in existing developments. **Policy OS-8.3:** Encourage private energy conservation programs that minimize high energy demand and that use alternative energy sources. **Policy OS-8.4:** Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities. **Policy OS-8.5:** Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools). **Policy OS-8.6:** Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24. **Policy OS-8.7:** Encourage mixed use development as a means of reducing the need for auto travel. **Policy OS-8.8:** Encourage the use of clean burning fuels and solar energy for space and water heating purposes and explore ways to participate in California New Solar	**Consistent:** Development implemented under the proposed CBUSP Amendment shall occur in accordance with all applicable requirements of the CCR, Title 24 (also known as the California Building Standards Code or the California Building Code) and Title 16, *Buildings and Construction*, of the RMC in effect at the time of construction. Future projects implemented under the proposed CBUSP Amendment would be required to comply with California's CALGreen building regulations as implemented through the requirements of the UBC Title 24. The UBC Title 24 is 1) "the most stringent, environmentally friendly building codes in the U.S.;" and 2) "CALGreen is a comprehensive, far-reaching set of regulations which mandate environmentally advanced building practices and regulations designed to conserve natural resources and reduce greenhouse gas emissions, energy use, and water use." In addition, in compliance with the CALGreen building regulations, the Project proposes to incorporate the following sustainable design features to further reduce its environmental footprint through various objectives and policies designed to shape and implement future development within the CBU Specific Plan Zone, including: • Objective 6: Encourage environmentally sustainable development and operational practices; o Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Homes Partnerships. **Policy OS-8.9:** Encourage construction and subdivision design that allows the use of solar energy systems. **Policy OS-8.10:** Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies. **Policy OS-8.12:** Require bicycle parking in new non-residential development.	term operating expenses consistent with City of Riverside building code requirements. o Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals. o Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements. o Policy 6.4: Implement sustainability measures that complement and support the *City of Riverside Green Action Plan.* The proposed Project site is adjacent to public transportation. The Riverside Transit Agency's Gold Line, RapidLink, and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site. As detailed in Section 4.10.4 above (Chapter 5 of the CBUSP Amendment), and in accordance with Corridor-Wide Policy 1.2 of the *Magnolia Avenue Specific Plan*, the CBU streetscape design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments.
Objective OS-10 Preserve the quantity and quality of all water resources throughout Riverside. **Policy OS-10.1:** Support the development and promotion of water conservation programs. **Policy OS-10.4:** Develop a recommended native, low-water-use and drought-tolerant plant species list for use with open space and park development. Include this list in the landscape standards for private development. **Policy OS-10.5:** Establish standards for the use of reclaimed water for landscaping. **Policy OS-10.6:** Continue to enforce RWQCB regulations regarding urban runoff.	**Consistent:** The proposed Project will be required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the Project site. The Project proposes the use of drought tolerant landscaping to maximize water conservation. Landscape watering will be tailored to suit specific plant community needs and include a shut-off feature to prevent irrigation during rain events. Features proposed by the Project for subsequent developments to reduce water include low-flow toilets and faucet aerators. The CBUSP Amendment shall comply with NPDES requirements, including development of project-

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Policy OS-10.7: Work with the RWQCB in the establishment and enforcement of urban runoff water quality standards. **Policy OS-10.9:** Evaluate development projects for compliance with NPDES requirements, and require new development to landscape a percentage of the site to filter pollutant loads in stormwater runoff and provide groundwater percolation zones. **Policy OS-10.10:** Protect aquifer recharge features and areas of important aquifers from degradation of water quality and reduction of recharge.	specific SWPPP, WQMP, and applicable BMPs. To promote infiltration of onsite runoff, stormwater treatment systems to be considered include, but are not limited to bio-swales, bio-retention cells, rain gardens, native mixed grasses, pervious paving systems, packaged storm treatment units, and storm water infiltration systems. In addition, the project will comply with the latest Green Building Code requirements for water conservation. Additionally, CBU is committed to implementing any programs the City of Riverside may implement once reclaimed water infrastructure is available at the campus edge.
Air Quality Element	
Objective AQ-5 Increase energy efficiency and conservation in an effort to reduce air pollution. **Policy AQ-5.1:** Utilize source reduction, recycling and other appropriate measures to reduce the amount of solid waste disposed of in landfills. **Policy AQ-5.2:** Develop incentives and/or regulations regarding energy conservation requirements for private and public developments. **Policy AQ-5.3:** Continue and expand use of renewable energy resources such as wind, solar, water, landfill gas, and geothermal sources. **Policy AQ-5.4:** Continue and expand the creation of locally-based solar photovoltaic power stations in Riverside. **Policy AQ-5.6:** Support the use of automated equipment for conditioned facilities to control heating and air conditioning. **Policy AQ-5.7:** Require residential building construction to meet or exceed energy use guidelines in Title 24 of the California Administrative Code.	**Consistent:** Development implemented under the proposed CBUSP Amendment shall occur in accordance with all applicable requirements of the CCR, Title 24 (also known as the California Building Standards Code or the California Building Code) and Title 16, *Buildings and Construction,* of the RMC in effect at the time of construction. Future projects implemented under the proposed CBUSP Amendment would be required to comply with California's CALGreen building regulations as implemented through the requirements of the UBC Title 24. The UBC Title 24 is 1) "the most stringent, environmentally friendly building codes in the U.S.;" and 2) "CALGreen is a comprehensive, far-reaching set of regulations which mandate environmentally advanced building practices and regulations designed to conserve natural resources and reduce greenhouse gas emissions, energy use, and water use." In addition, in compliance with the CALGreen building regulations, the Project proposes to incorporate the following sustainable design features to further reduce its environmental footprint through various objectives and policies designed to shape and implement future development within the CBU Specific Plan Zone, including: • Objective 6: Encourage environmentally sustainable development and operational practices; o Policy 6.1: Improve energy and lifecycle

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
	performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with California Green Building Code. o Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals. o Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements. o Policy 6.4: Implement sustainability measures that complement and support the *City of Riverside Green Action Plan.*
Public Facilities Element	
Objective PF-3 Maintain sufficient levels of wastewater service throughout the community. **Policy PF-3.1**: Coordinate the demands of new development with the capacity of the wastewater system. **Policy PF-3.2:** Continue to require that new development fund fair-share costs associated with the provision of wastewater service. **Policy PF-3.3**: Pursue improvements and upgrades to the City's wastewater collection facilities consistent with current master plans and the City's Capital Improvement Program. **Policy PF-3.4**: Continue to investigate and carry out cost-effective methods for reducing stormwater flows into the wastewater system and the Santa Ana River.	**Consistent:** To meet the growth needs of the University and supply all planned facilities, improvements to the internal campus infrastructure, including, but not limited to potable and storm water, sewer, electrical, natural gas, solid waste, and telecommunications will be implemented. Future development implemented under the proposed CBUSP Amendment will be subject to development impact fees for the provision of public facilities, including wastewater service. Figure 3-19, *Existing and Planned Sewer Facilities*, of the CBUSP Amendment details the existing and proposed potable sewer infrastructure designed to accommodate projected student enrollment and campus development. Figure 3-20, *Storm Drain System*, and Figure 3-21, *Planned Storm Drains*, of the CBUSP Amendment detail the existing and proposed storm drain system designed to reduce flow to the regional storm drain system and capture stormwater for beneficial reuse.
Objective PF-4 Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows. **Policy PF-4.1:** Continue to fund and undertake storm drain improvement projects as identified in the City of Riverside Capital Improvement Plan.	**Consistent:** To meet the growth needs of the University and supply all planned facilities, improvements to the internal campus infrastructure, including, but not limited to potable and storm water, sewer, electrical, natural gas, solid waste, and telecommunications will be implemented. Future development implemented under the proposed CBUSP Amendment will be subject to

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program. **Policy PF-4.3:** Continue to routinely monitor and evaluate the effectiveness of the storm drain system and make adjustments as needed.	development impact fees for the provision of public facilities, including storm drainage service. The CBUSP Amendment shall comply with NPDES requirements, including development of project-specific SWPPP, WQMP, and applicable BMPs. To promote infiltration of onsite runoff, stormwater treatment systems to be considered include, but are not limited to bio-swales, bio-retention cells, rain gardens, native mixed grasses, pervious paving systems, packaged storm treatment units, and storm water infiltration systems. Figure 3-20, *Storm Drain System*, and Figure 3-21, *Planned Storm Drains*, of the CBUSP Amendment detail the existing and proposed storm drain system designed to reduce flow to the regional storm drain system and capture stormwater for beneficial reuse.
Objective PF-5 Minimize the volume of waste materials entering regional landfills. **Policy PF-5.1:** Develop innovative methods and strategies to reduce the amount of waste materials entering landfills. The City should aim to achieve 100% recycling citywide for both residential and non-residential development.	**Consistent:** The proposed Project would be required to coordinate with the waste hauler to develop collection of recyclable materials for the Project on a common schedule as set forth in applicable local, regional, and State programs. Recyclable materials that could be recycled by the project include paper products, glass, aluminum, and plastic. Additionally, the proposed Project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991) and other applicable local, State, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills are reduced in accordance with existing regulations.
Parks and Recreation Element	
Objective PR-1 Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents. **Policy PR-1.3:** Encourage private development of recreation facilities that complement and supplement the public recreational system. **Policy PR-1.6:** Encourage private development of recreation facilities that complement and supplement the	**Consistent:** The proposed CBUSP Amendment establishes a comprehensive development program for additional recreation and parks facilities to accommodate the anticipated increase in student enrollment. CBU's open space network consists of the Magnolia Lawn, Stamps Courtyard, Harden Square, a water quality detention basin, the athletic fields, and a network of smaller courtyards, plazas, and lawns

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
public recreational system.	that surround and are incorporated into the student housing areas. Together these areas comprise the recreation and parks resources within the CBU Specific Plan Zone. The open space and recreation plan will ensure students have a place for relaxation, recreation, contemplation, and gathering and will contribute to the ambiance and character of the campus. Development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) to ensure CBU's open space network is maintained as a distinguished and functional component of CBU. Athletic open space will provide for athletic fields appropriate to the competitive division of college athletics with which CBU is affiliated. Proposed improvements to existing athletic facilities include enhanced stadium seating capacity for baseball, softball, and soccer fields, up to 3,000, 2,000, and 2,500 spectators, respectively, as well as upgrades to the aquatic facility such as pool upgrades, bleacher improvements, and enhanced concession facilities.
Historic Preservation Element	
Objective HP-1 To use historic preservation principles as an equal component in the planning and development process. **Policy HP-1.1:** The City shall promote the preservation of cultural resources to ensure that citizens of Riverside have the opportunity to understand and appreciate the City's unique heritage. **Policy HP-1.2:** The City shall assume its direct responsibility for historic preservation by protecting and maintaining its publicly owned cultural resources. Such resources may include, but are not limited to, buildings, monuments, landscapes, and right-of-way improvements, such as retaining walls, granite curbs, entry monuments, light standards, street trees, and the scoring, dimensions, and patterns of sidewalks, driveways, curbs and gutters. **Policy HP-1.3**: The City shall protect sites of archaeological and paleontological significance and ensure compliance with all applicable State and federal cultural resources protection and management laws in its planning and project review process. **Policy HP-1.4:** The City shall protect natural resources such as geological features, heritage trees, and	**Consistent:** Implementation of the proposed CBUSP Amendment shall occur in accordance with Title 20 (*Historic Preservation*) of the RMC. Additionally, all subsequent development projects proposed under the CBUSP Amendment will be subject to the development standards outlined in Table 4.5.A, *Disposition of Properties Surveyed for Historic Significance*, of this Draft EIR (Table 3-3 in the CBUSP Amendment) in addition to the objectives and policies (Chapter 2), land use regulations and development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) presented in the CBUSP Amendment. Furthermore, implementation of **MM CUL-1** through **MM CUL-3** would ensure appropriate management of cultural resources. New development on campus will be designed to respect historic context and will not erode, degrade, or diminish the individual qualities and defining characteristics of any historic resource on the Project site and surrounding neighborhoods, or the integrity of the Magnolia Heritage District.

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
landscapes in the planning and development review process and in park and open space planning. **Policy HP-1.5:** The City shall promote neighborhood/city identity and the role of historic preservation in community enhancement. **Policy HP-1.6:** The City shall use historic preservation as a tool for "smart growth" and mixed use development.	According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University. CBU is a major contributor to the historic fabric of Magnolia Avenue, as the Campus boasts several facilities dating to the late 19th or early 20th Centuries which contribute to the historic nature of the Magnolia Heritage District. Accordingly, the proposed CBUSP Amendment includes several objectives and policies designed to guide design elements of future projects subject to compliance with the plan to ensure a cohesive and unified architectural, landscape, and circulation typology. Policy 5.1 of the CBUSP Amendment encourages the preservation of existing significant historical structures within the CBU Specific Plan Zone through rehabilitation, adaptive use, and relocation. Policy 5.2 of the CBUSP Amendment provides design guidance to ensure that new buildings are architecturally compatible with the existing historical campus architecture. Policy 5.3 protects historical landscapes and other non-structural features pursuant to the standards in the CBUSP Amendment. Policy 5.4 designates a CBU Historical District, in accordance with Title 20 of the RMC, that encompasses buildings and other features that reflect Riverside's rich history.
Objective HP-4: To fully integrate the consideration of cultural resources as a major aspect of the City's planning permitting and development activities. **Policy HP-4.1:** The City shall maintain an up-to-date database of cultural resources and use that database as a primary informational resource for protecting those resources. **Policy HP-4.2:** The City shall apply the California State Historical Building Code to ensure that City building code requirements do not compromise the integrity of significant cultural resources, at the property owner's request. **Policy HP-4.3:** The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites	**Consistent:** As detailed in Section 4.5, *Cultural Resources*, of this Draft EIR, the City engaged interested tribes in accordance with Senate Bill 18 and Assembly Bill 52. Federally and locally designated cultural resources within the Specific Plan area have been evaluated for historic significance, and treatment for each resource is outlined in Table 4.5-A, *Disposition of Properties Surveyed for Historical Significance,* of this Draft EIR. For additional information on the inventory and treatment of cultural resources, refer to response to *General Plan 2025* Objective HP-1, above.

Table 4.10-A
General Plan 2025 Consistency Analysis

General Plan Objectives and Policies	General Plan Consistency Analysis
through the development review process.	
Objective HP-5 To ensure compatibility between new development and existing cultural resources. **Policy HP-5.1:** The City shall use its design and plot plan review processes to encourage new construction to be compatible in scale and character with cultural resources and historic districts. **Policy HP-5.2:** The City shall use its design and plot plan review processes to encourage the compatibility of street design, public improvements, and utility infrastructure with cultural resources and historic districts.	**Consistent:** Refer to response to *General Plan 2025* Objective HP-1, above.
Objective HP-7 To encourage both public and private stewardship of the City's cultural resources. **Policy HP-7.1:** The City shall apply code enforcement, zoning actions, and building safety/construction regulations as tools for helping to protect cultural resources. **Policy HP-7.2:** The City shall incorporate preservation as an integral part of its specific plans, general plan, and environmental processes.	**Consistent:** Refer to response to *General Plan 2025* Objective HP-1, above.

Source: *General Plan 2025*. City of Riverside. November 2007, Amended November 2012 and March 2013.

As stated previously, the CBU College of Health Sciences at 3532 Monroe Street (APN 233-12-0010) and the former site of the Riverside Christina Elementary School at 3626 Monroe Street (APN 233-11-0045) are currently zoned Single Family Residential (R-1-7000) within the *Magnolia Avenue Specific Plan* (Magnolia Heritage District) overlay. The CBUSP Amendment proposes to remove the CBU College of Health Sciences at 3532 Monroe Street (APN 233-12-0010) and at the former site of the Riverside Christian High School at 3626 Monroe Street (APN 233-11-0045) from the *Magnolia Avenue Specific Plan* (Magnolia Heritage District) overlay and zone them CBUSP-2 within the CBU Specific Plan Zone.

According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides opportunities to redevelop the general area with higher density, mixed use development that would complement the University. For the CBU Specific Plan Zone, the Design Guidelines outlined in the proposed CBUSP Amendment, would replace the design guidelines of the *Magnolia Avenue Specific Plan*. Table 4.10-B demonstrates consistency

between the existing Magnolia Heritage District of the *Magnolia Avenue Specific Plan* and the proposed CBU Specific Plan Zone.

Table 4.10-B
Magnolia Avenue Specific Plan Consistency Analysis

Magnolia Avenue Specific Plan Objectives and Policies	Magnolia Avenue Specific Plan Consistency Analysis
Corridor-Wide Objectives and Policies	
Corridor-Wide Objective 1 Restore the Magnolia/Market Corridor to its historical role as a scenic, "showcase roadway" that spans the City of Riverside while updating its function as a key transit corridor to support future growth. (General Plan Objective LU-12).	**Consistent:** Policy 2.1 of the CBUSP Amendment provides edge and transition standards that respect the character of the campus/community interface in accordance with the development standards outlined herein and the *Citywide Design Guidelines and Sign Guidelines*.
Corridor-Wide Policy 1.1 Through the Specific Plan process, further implement the earlier Polyzoides Plan for the corridor. Identify appropriate land uses, development opportunities and streetscape improvements along the Corridor that support the vision as a scenic roadway with distinct districts. Reinforce the desired land uses within the context of each district through development provisions and regulations. (General Plan Policy LU-12.1).	The street frontage along the south side of Magnolia Avenue shall consist of a combination public realm/private realm landscaped and pedestrian area. The public realm will consist of a minimum 21-foot wide parkway and 5-foot wide sidewalk. A 20-foot landscaped setback (measured from the property line) will be provided along the Magnolia Avenue frontage. No new buildings, opaque fences, or walls (other than monumentation walls) shall be placed within the 20-foot landscaped area except as authorized by the Community and Economic Development Director through a Minor Modification process.
Corridor-Wide Policy 1.2 Maintain the existing mature heritage landscaping and infill landscaping as appropriate to return the Corridor to being a grand tree-lined parkway. (General Plan Policy LU-12.2).	The street frontage on the north side of Magnolia Avenue shall consist of a combination public realm/private realm landscaped and pedestrian area. The public realm will consist of a minimum 26-foot right of way containing a 12-foot wide parkway, 5-foot wide sidewalk, and a 9-foot landscape area. A 20-foot landscaped setback will be provided on private properties. No new buildings, opaque fences, or walls shall be placed within the 20-foot landscaped area. However, existing buildings may remain within the landscaped setback area. Key features will include dense, attractive landscaping, uniform high-quality fencing materials, strong architectural design, a comprehensive sign program, and attractive campus gateways.
Corridor-Wide Policy 1.4 Expand and update the function of the Magnolia/Market Corridor as a key transit corridor to accommodate growth. (General Plan Policy LU-12.4).	Policy 5.2 of the CBUSP Amendment provides design guidance to ensure that new buildings are architecturally compatible with the existing historical campus architecture. Policy 5.1 of the CBUSP Amendment encourages the preservation of existing significant historical structures within the CBU Specific Plan Zone through rehabilitation, adaptive use, and relocation.
Corridor-Wide Policy 1.11 Collaborate on strong joint use arrangements to create partnerships with the City, Riverside Unified School District, Alvord Unified School District, Sherman Indian School and California Baptist University to remove barriers to joint use of facilities.	New development on campus will be designed to respect historic context and will not erode, degrade, or diminish

Table 4.10-B
Magnolia Avenue Specific Plan Consistency Analysis

Magnolia Avenue Specific Plan Objectives and Policies	Magnolia Avenue Specific Plan Consistency Analysis
	the individual qualities and defining characteristics of any historic resource on the project site and surrounding neighborhoods, or the integrity of the Magnolia Heritage District. Federally and locally designated cultural resources within the Specific Plan area have been evaluated for historic significance, and treatment for each resource is outlined in Table 4.5-A, *Disposition of Properties Surveyed for Historical Significance,* of this Draft EIR. Policy 2.3 of the CBUSP Amendment proposes to maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage. Future circulation on the main campus has been organized to provide access to the campus interior via two main gateway entry points (on Magnolia Avenue and Adams Street), a primary vehicular roadway (Campus Bridge Drive/Lancer Lane) that loops from Magnolia Avenue to Adams Street, interior secondary roadways, interior pedestrian routes, and designated emergency vehicle access/routes. Bicycle circulation will continue to share these routes. The original main entry to the CBU campus from Magnolia Avenue will continue to provide key access to the campus. As new buildings are constructed over time, the main signature entry gateway will move to Adams Street, serving in a more prominent position than the Magnolia Avenue entry by way of overhead signage. Given the location of this gateway relative to SR-91, moving the main entry to Adams Street will reduce University-related traffic on the local road network.
Corridor-Wide Objective 2: Design the Magnolia Avenue/Market Street Corridor as a transit- and pedestrian-oriented Mixed Use boulevard. (General Plan Objective CCM-3). **Corridor-Wide Policy 2.2** Consider the implementation of off-street shared parking with parking signage improvements, consolidation of driveways, installation of raised landscaped medians, bus turnouts, traffic signal enhancements, special pavement treatments at pedestrian crossings and intersections, curb extensions, signalized/enhanced crosswalks, wider sidewalks and other appropriate measures which enhance traffic flow, transit efficiency and pedestrian movements. (General Plan Policy CCM-3.2).	**Consistent:** Refer to response to *Magnolia Avenue Specific Plan* Corridor-Wide Objective-1, above.

Table 4.10-B
Magnolia Avenue Specific Plan Consistency Analysis

Magnolia Avenue Specific Plan Objectives and Policies	Magnolia Avenue Specific Plan Consistency Analysis
Magnolia Heritage District	
Heritage District Objective 1 Maintain the established residential character of the Magnolia Heritage District while allowing for higher intensity transit oriented residential and mixed-use development on opportunity sites, particularly along Magnolia and California avenues (General Plan Objective LU-78). **Heritage District Policy 1.1** Improve and expand the housing stock to support and complement the major educational institutions and bus rapid transit (General Plan Policy LU-78.1). **Heritage District Policy 1.2** Preserve historic landscaping and increase green space along the Magnolia Corridor (General Plan Policy LU-78.2). **Heritage District Policy 1.3** Encourage continued enhancement and growth of the significant institutional uses along the Magnolia Corridor (General Plan Policy LU-78.3). **Heritage District Policy 1.6** Require large-scale development along block faces of Magnolia Avenue that are designated Very High Density Residential (VHDR). Ensure that resulting development is sensitive to surrounding uses (General Plan Policy LU-78.6).	**Consistent.** Implementation of the proposed CBUSP Amendment is designed to establish a framework for a more urban-style development pattern while maintaining the aesthetic and historical nature of the Magnolia Heritage District; it does not involve construction of new buildings or a specific project which may impact the aesthetic qualities of Magnolia Avenue or the Magnolia Heritage District. On the contrary, CBU is a major contributor to the historic fabric of Magnolia Avenue, as the Campus boasts several facilities dating to the late 19th or early 20th Centuries which contribute to the historic nature of the Magnolia Heritage District. Accordingly, the proposed CBUSP Amendment includes design elements to be implemented during execution of future projects subject to compliance with the Plan to ensure a cohesive and unified architectural, landscape, and circulation typology. Policy 2.1 of the CBU Specific Plan, as amended, proposes to provide edge and transition standards that respect the character of the campus/community interface in accordance with the development standards outlined herein and the *Citywide Design Guidelines and Sign Guidelines*. Landscape buffers and gateway treatments will provide visuals cues that differentiate the campus from surrounding areas. Buffers can coincide with existing and planned green spaces. Larger open spaces will be located on an axis connecting the Magnolia Lawn/water quality basin, and athletic fields. These open spaces will be augmented by landscape buffers along Magnolia Avenue and parkways along Monroe Street. Additional plazas will be located in the interior portion of campus to create a strong campus identity. New development on campus will be designed to respect historic context and will not erode, degrade, or diminish the individual qualities and defining characteristics of any historic resource on the project site and surrounding neighborhoods, or the integrity of the Magnolia Heritage District. Federally and locally designated cultural resources within the Specific Plan area have been evaluated for historic significance, and treatment for each resource is outlined in Table 4.5-A, *Disposition of Properties Surveyed for Historical Significance*, of this Draft EIR. Policy 2.3 of the CBUSP Amendment proposes to

Table 4.10-B
Magnolia Avenue Specific Plan Consistency Analysis

Magnolia Avenue Specific Plan Objectives and Policies	Magnolia Avenue Specific Plan Consistency Analysis
	maintain the established residential character of the Magnolia Heritage District, while allowing for higher intensity pedestrian-oriented mixed-use development on opportunity sites, particularly along Magnolia Avenue.

Regional Plans. Pursuant to CEQA Guidelines Section 15125 (d), this Draft EIR section includes an evaluation of the consistency of the proposed Project with pertinent goals and policies of relevant adopted regional plans. The SCAG approved the following regional plans, which are applicable to the proposed project: (a) Regional Comprehensive Plan (RCP); (b) Regional Transportation Plan (RTP); (c) and Sustainable Communities Strategy (SCS) Plan related to the RTP. The following subsections (a) through (c) evaluate the proposed project's consistency with these various SCAG plans.

a. Regional Comprehensive Plan (RCP)

The RCP's overall goal is to reinvigorate the region's economy, avoid social and economic inequities and the geographical dislocation of communities, and to maintain the region's quality of life. The document is described as a regional policy framework for future land use decisions in the SCAG area that respects the need for strong local control, but that also recognizes the importance of regional comprehensive planning for issues of regional significance. The RCP is laid out much like a General Plan and organizes recommended policies into nine chapters.

The highlight of each chapter is the regional strategy that addresses the RCP's vision for that resource area. As such, each chapter includes three levels of recommendations for the region:

- *Goals.* Each goal will help define how sustainability is defined for that resource area.
- *Outcomes.* These focus on quantitative targets that define progress toward meeting the RCP's Goals. Where possible, they are clearly defined (e.g., a 20% reduction in greenhouse gas emissions from 2007 levels), capable of being monitored with existing or reasonably foreseeable resources, and have a strong link to sustainability goals.
- *Action Plan.* This critical part of the RCP lays out a comprehensive implementation strategy that recommends how the region can systematically move to meet the RCP's quantitative Outcomes and achieve its Goals, Guiding Principles, and Vision. Each Action Plan contains:
    - *Constrained Policies.* This includes a series of recommended near-term, feasible policies that stakeholders should consider for implementation. For example, the RCP calls on the SCAG to adopt policies that reflect its role as a planning agency, council of governments,

and metropolitan planning organization. The RCP also recommends voluntary policies for consideration by local governments and other key stakeholders.

- *Strategic Initiatives.* This encompasses longer-term strategies that require significant effort to implement but are necessary to achieve the RCP's desired Goals and Outcomes. For example, identifying technological breakthroughs that can reduce air pollution from the transportation sector requires both commitment and time. Most of these initiatives are not constrained and will require political will, enabling legislation, new funding sources, and other key developments to become a reality. In most cases, this tier of strategies is the key to achieving the region's sustainability Goals and Outcomes.

Other policies contained within the 2008 RCP were either not applicable to the proposed project or are directed at the SCAG and actions that the SCAG would undertake at the regional level that would not pertain directly to the proposed Project. Policies within the RCP that are applicable to the proposed project were identified and are discussed below.

Land Use and Housing Chapter

Goal *Focusing growth in existing and emerging centers and along major transportation corridors.*

Consistent. CBU's enrollment has increased from 2,300 students in 2003 to 6,263 in 2012 to 8,414 in 2015 and is one of the fastest growing private Universities in the Inland Empire with access to several interstate freeways, east/west rail lines, and the Ontario International Airport only eleven miles from the Project site. The proposed Project would expand the campus boundary and facilities in order to facilitate an anticipated increase in student enrollment from 8,414 total students in 2015 to 12,000 total students by 2025 due to an expansion of curriculum offered at CBU.

Goal *Targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations.*

Consistent. The proposed project would comply with all City development policies, standards, and programs pertaining to supporting alternative modes of transportation included in the Circulation Element of the *General Plan 2025*. In addition, the proposed project is located within an urbanized area of the City. The approved and planned development in the project region includes residential, commercial, institutional, and industrial uses. As such, the proposed Project site is in an area that is developed with projects that have already been approved and constructed, or are in the various stages of the planning process.

The Riverside Transit Agency currently provides bus service to the project site; the RapidLink, Gold Line and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to

other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site, which support the City's General Plan objectives and policies related to alternative modes of transportation. Policy 2.3 of the CBUSP Amendment proposes to design the Magnolia Avenue Corridor as a pedestrian-oriented mixed-use boulevard along the campus frontage. Policies, plans, and/or programs supporting alternative transportation would be reviewed through the City's project review process and incorporated as applicable. Therefore, the proposed Project would be consistent with this SCAG Policy.

Outcome *Significantly increase the number and percentage of new housing units and jobs created within the Compass Blueprint 2% Strategy Opportunity Areas by 2012 and improve the regional jobs-housing balance. (Tracking the number of new units will measure the region's progress in accommodating forecast growth. The percentage of housing and jobs developed within the Opportunity Areas will indicate the locational efficiency of growth.)*

Consistent. The jobs-to-housing ratio of the SCAG region is currently 1.25 jobs for every household. This standard is used because most residents of the region are employed somewhere in the SCAG region. A City or sub-region with a jobs-to-housing ratio lower than the overall standard of 1.25 jobs for every household would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the sub-area. These longer commutes result in freeway congestion, increased air pollution, and reduced quality of life for commuters. The 2012 jobs-to-housing ratios for the City, County, and SCAG region are 1.30, 0.89, and 1.25, respectively.[17] These jobs/housing ratios indicate that the City trends towards a slightly more "jobs rich" scenario compared to the SCAG region.

Based on a student to faculty/staff ratio of 11.11,[18] the projected increase in students from 8,414 in 2015 to 12,000 by 2025 would yield an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. Therefore, the proposed Project would generate approximately 323 additional jobs in the City. Of the 12,000 projected students in 2025, 7,201 are considered *traditional* students, meaning full-time undergraduates who either live on campus or commute.[19] Since every traditional student must live on campus until the age of 21 as a matter of CBU policy, and CBU's goal is to provide a bed-to-student ratio of 0.55 for traditional students[20] implementation of the

[17] *Demographics & Growth Forecast (Appendix).* 2016-2040 SCAG RTP-SCS. Table 11. Adopted April 7, 2016.
[18] *California Baptist University Specific Plan Amendment. Public Review Draft.* Chapter 4, Section D, Subsection 1. Table 4-3. City of Riverside. August 2018.
[19] *Ibid.* Page 19.
[20] *Ibid.* Page 19.

CBUSP Amendment could generate up to 326 additional student housing units by 2025.[21] Therefore, implementation of the CBUSP Amendment would result in a "housing rich" jobs-to-housing ratio of 0.99 in a City currently "jobs rich" according to SCAG. The CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. For these reasons, the proposed Project is consistent with the desired outcome of this SCAG policy.

Outcome *Reduce total regional vehicle miles traveled (VMT) to 1990 levels by 2020. (The Land Use and Housing Action Plan can be expected to result in a 10% reduction in VMT in 2035 when compared to current trends. VMT serves as a proxy for jobs/housing balance, urban design, transit accessibility, and other urban form issues. VMT per household will decrease with Compass Blueprint implementation.)*

Consistent. As previously identified, the proposed project would comply with all City development policies, standards, and programs pertaining to supporting alternative modes of transportation included in the Circulation Element of the *General Plan 2025*. For example, the Riverside Transit Agency currently provides bus service to the project site; the RapidLink, Gold Line and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site, which support the City's General Plan objectives and policies related to alternative modes of transportation. Policy 2.3 of the CBUSP Amendment proposes to design the Magnolia Avenue Corridor as a pedestrian-oriented mixed-use boulevard along the campus frontage. Because the Project site is located in close proximity to an existing bus route, the proposed project would be accessible to existing transit systems. Additionally, the jobs-to-housing ratio of the SCAG region is currently 1.25 jobs for every household. This standard is used because most residents of the region are employed somewhere in the SCAG region.

A City or sub-region with a jobs-to-housing ratio lower than the overall standard of 1.25 jobs for every household would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the sub-area. These longer commutes result in freeway congestion, increased air pollution, and reduced quality of life for commuters. The 2012 jobs-to-housing ratios for the City, County, and SCAG region are 1.30, 0.89, and 1.25, respectively.[22] These jobs/housing ratios indicate that the City trends towards a slightly more "jobs rich" scenario compared to the SCAG region. However, implementation of the CBUSP

[21] *Ibid.* Page 19 and Table 2-3. Based on an average of 3.375 students per student housing unit type within the CBU Specific Plan Zone. 1,100 additional beds projected from 2015 to 2025 ÷ 3.375 students per CBU housing unit = 326 additional student housing units.

[22] *Demographics & Growth Forecast (Appendix).* 2016-2040 SCAG RTP-SCS. Table 11. Adopted April 7, 2016.

Amendment would result in a "housing rich" jobs-to-housing ratio of 0.99 in a City currently "jobs rich" according to SCAG. The CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters. Therefore, the proposed project is consistent with the desired regional outcome of this SCAG policy.

Outcome *Significantly improve the efficiency of land use in the region's urbanized areas by 2035 (this measures the number of people and jobs per acre and the region's ability to accommodate growth in parts of the region that are already urbanized or that become urbanized during the planning period.).*

Consistent. The Project proposes an amendment to the 157-acre 2013 CBUSP and includes acquisition of two additional properties that are already developed, the College of Health Sciences property at 3532 Monroe Street (APN 233-12-0010) and the site of the former Riverside Christian High School at 3626 Monroe Street (APN 233-11-0045), resulting in a total of approximately 167 acres for the proposed CBUSP Amendment. The proposed Project will generate an increase in students from 8,414 in 2015 to 12,000 by 2025 and would generate an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. These increases in student and faculty/staff population would occur on land already developed but proposed for improvements in accordance with the development plan (Chapter 3), land use regulations and development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) in support of the objectives and policies of the CBUSP Amendment, as outlined in Section 4.10.4 above. Therefore, the proposed project is consistent with the desired regional outcome of this SCAG policy.

Policy LU-6.2 *Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program.*

Consistent. Future projects implemented under the proposed CBUSP Amendment would be required to comply with California's CALGreen building regulations as implemented through the requirements of the UBC Title 24. The UBC Title 24 is 1) "the most stringent, environmentally friendly building codes in the U.S.;" and 2) "CALGreen is a comprehensive, far-reaching set of regulations which mandate environmentally advanced building practices and regulations designed to conserve natural resources and reduce greenhouse gas emissions, energy use, and water use."

In addition, in compliance with the CALGreen building regulations, the Project proposes to incorporate the following sustainable design features to further reduce its environmental footprint through various objectives and policies designed to shape and implement future development within the CBU Specific Plan Zone, including:

- Objective 6: Encourage environmentally sustainable development and operational practices;
  - Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with California Green Building Code.
  - Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals.
  - Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements.
  - Policy 6.4: Implement sustainability measures that complement and support the *City of Riverside Green Action Plan*.

Therefore, the proposed project is consistent with this SCAG policy.

Open Space and Habitat Chapter

Policy OSC-8 *Local governments should encourage patterns of urban development and land use, which reduce costs of infrastructure and make better use of existing facilities.*

Consistent. The proposed Project is adjacent to existing developed areas that are presently served by various existing water, sewer, storm drainage, electrical, natural gas, and transportation services. During implementation of the proposed CBUSP Amendment, and as needed during project-specific developments, necessary utility and roadway improvements will be installed or extended to the Project site from adjacent existing facilities. The supply of electricity and natural gas is demand-responsive, and the Project applicant would be required to meet the service requirements of these utility providers. By maximizing the use of existing facilities, the costs of expanding infrastructure would be minimized. Because the proposed Project is be located in close proximity to existing industrial, commercial, institutional, and residential structures requiring a similar type of infrastructure, it is consistent with this growth management policy.

Policy OSC-12 *Developers and local governments should promote water-efficient land use and development.*

Consistent. The proposed Project is required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the Project site. A major design concept of the proposed Project is water conservation through the careful selection and maintenance of drought-tolerant landscaping. Additionally, CBU is committed to implementing any programs the City of Riverside may implement once reclaimed water infrastructure is available at the campus edge. Therefore, the proposed project would be consistent with this SCAG policy.

Water Chapter

Policy WA-11 *Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.*

Consistent. The proposed Project is located in the immediate vicinity of infrastructure for water, sewer, storm drainage, electrical, natural gas, and transportation facilities. During implementation of the proposed CBUSP Amendment, and as needed during project-specific developments, necessary utility and roadway improvements will be installed or extended to the Project site from adjacent existing facilities. The availability of this nearby infrastructure would reduce the cost to public agencies that would provide services to the Project site and vicinity. The proposed Project would be developed in an area where such infrastructure is accessible. Furthermore, the Project applicant would pay all applicable development fees for the necessary infrastructure and public service improvements, including those associated with water, sewer, drainage, roadways, fire, and police; therefore, the proposed project is consistent with this policy.

Policy WA-12 *Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.*

Consistent. The proposed Project will be required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the Project site. The Project proposes the use of drought tolerant landscaping to maximize water conservation. Landscape watering will be tailored to suit specific plant community needs and include a shut-off feature to prevent irrigation during rain events. Features proposed by the Project for subsequent developments to reduce water include low-flow toilets and faucet aerators. To promote infiltration of onsite runoff, storm water treatment systems to be considered include, but are not limited to bio-swales, bio-retention cells, rain gardens, native mixed grasses, pervious paving systems, packaged storm treatment units, and storm water infiltration systems. In addition, the project will comply with the latest Green Building Code requirements for water conservation. Therefore, the proposed project would be consistent with this SCAG policy.

Energy Chapter

Policy EN-10 *Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy-saving measures that should be explored for new and remodeled buildings include:*

- *Using energy-efficient materials in building design, construction, rehabilitation, and retrofit.*
- *Encouraging new development to exceed Title 24 energy efficiency requirements.*
- *Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment.*
- *Utilizing efficient commercial/residential space and water heaters. This could include the advertisement of existing and/or development of additional incentives for energy-efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits.*
- *Encouraging landscaping that requires no additional irrigation; utilizing native, drought-tolerant plants can reduce water usage up to 60 percent compared to traditional lawns.*
- *Encouraging combined heating and cooling (CHC), also known as cogeneration, in all buildings.*
- *Encouraging neighborhood energy systems, which allow communities to generate their own electricity.*
- *Orienting streets and buildings for best solar access.*
- *Encouraging buildings to obtain at least 20 percent of their electric load from renewable energy.*

Consistent. The Project will comply with California's "CALGreen" building regulations and the UBC Title 24 energy conservation standards which are considered the most stringent,

environmentally friendly building codes in the U.S. In addition, the strategies listed in Section 4.7, *Greenhouse Gas Emissions and Climate Change* of this EIR are considered to be greenhouse gas emission reduction strategies, which include green building measures. These strategies are either part of the Project, required mitigation measures, or requirements under local or State ordinances. Since implementation of the proposed CBUSP Amendment, and as needed during project-specific developments, would incorporate these strategies into project design and operation, the proposed project would be consistent with this SCAG policy.

Policy EN-10S *Local governments should employ land use planning measures, such as zoning, to improve jobs/housing balance and creating communities where people live closer to work, bike, walk, and take transit as a substitute for personal auto travel.*

Consistent. The Project proposes an amendment to the 157-acre 2013 CBUSP and includes acquisition of two additional properties that are already developed, the College of Health Sciences property at 3532 Monroe Street (APN 233-12-0010) and the site of the former Riverside Christian Elementary School at 3626 Monroe Street (APN 233-11-0045), resulting in a total of approximately 167 acres for the proposed CBUSP Amendment. The proposed Project will generate an increase in students from 8,414 in 2015 to 12,000 by 2025 and would generate an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. These increases in student and faculty/staff population would occur on land already developed but proposed for improvements in accordance with the development plan (Chapter 3), land use regulations and development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) in support of the objectives and policies of the CBUSP Amendment, as outlined in Section 4.10.4 above.

Of the 12,000 projected students in 2025, 7,201 are considered *traditional* students, meaning full-time undergraduates who either live on campus or commute.[23] Since every traditional student must live on campus until the age of 21 as a matter of CBU policy, and CBU's goal is to provide a bed-to-student ratio of 0.55 for traditional students[24] implementation of the CBUSP Amendment could generate up to 326 additional student housing units by 2025.[25] Therefore, implementation of the CBUSP Amendment would result in a "housing rich" jobs-to-housing ratio of 0.99 in a City currently "jobs rich" according to SCAG. The CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in

[23] *California Baptist University Specific Plan Amendment. Public Review Draft.* Chapter 2 Section E, Subsection 1. City of Riverside. August 2018.

[24] *Ibid.*

[25] *Ibid* and Table 2-3. Based on an average of 3.375 students per student housing unit type within the CBU Specific Plan Zone. 1,100 additional beds projected from 2015 to 2025 ÷ 3.375 students per CBU housing unit = 326 additional student housing units.

student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City.

Policy 2.3 of the CBUSP Amendment proposed to design the Magnolia Avenue Corridor as a pedestrian-oriented mixed-use boulevard along the campus frontage, while Policy 4.2 shall provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus. The proposed streetscape design shall maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, and Monroe Street will require greater coordination with the City Planning Division and Public Works Department to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements. Therefore, the proposed Project is consistent with the desired regional outcome of this SCAG policy.

Air Quality Chapter

Goal *Reduce emissions of criteria pollutants to attain federal air quality standards by prescribed dates and state ambient air quality standards as soon as practicable.*

Consistent. As detailed in Section 4.3, *Air Quality,* implementation of the proposed Project would not exceed Southern California Air Quality Management District (SCAQMD) regional thresholds for air pollution (Table 4.3.H). Therefore, the proposed Project is consistent with this policy.

Goal *Reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas.*

Consistent. As detailed in Section 4.7, *Greenhouse Gases,* the estimated greenhouse gas (GHG) emissions from Project implementation would be reduced with implementation of mitigation (see Section 4.7, Mitigation Measures GHG-1 and GHG-2). With implementation of these measures, the proposed Project would be consistent with this goal.

Goal *Minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM_{10}, $PM_{2.5}$, ultrafine), and carbon monoxide.*

Consistent. As detailed in Section 4.3, *Air Quality,* implementation of the proposed Project would not exceed SCAQMD regional thresholds for air pollution emissions (Table 4.3.G and Table 4.3.H).

Additionally, Table 4.3.I and Table 4.3.J detail long-term localized significance health risks from Project implementation; no sensitive receptors would be exposed to significant air pollution levels. Therefore, the proposed Project is consistent with this policy.

Solid Waste Chapter

Policy SW-14 *Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include:*

- *Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities.*
- *An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion.*
- *Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings).*
- *Reuse of existing building structure and shell in renovation projects.*

Building lifetime waste reduction measures that should be explored for new and remodeled buildings include:

- *Development of indoor recycling program and space;*
- *Design for deconstruction; and*
- *Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting, and other reusable components.*

Consistent. Solid waste disposal and recycling services for the proposed Project site would be provided by Burrtec Waste Industries, Inc., which currently collects and disposes of CBU's solid waste at the Agua Mansa Transfer Station and Material Recovery Facility, where the recyclables are sorted. The balance of the solid waste gets transferred to the to the Agua Mansa Landfill located at 1830 Agua Mansa Road in Colton. The City of Riverside is responsible for meeting the requirements of AB 939 and SB 1016, which includes a 50 percent reduction in disposal of

solid waste by the year 2000 and preparation of a solid waste reduction plan to help reduce the amount of solid waste disposed of at regional landfills. Programs implemented by the City to satisfy the mandated reduction in solid waste include, but are not limited to, the following:

- Public outreach via print and electronic media (public education);
- Municipal solid waste ordinances and product and landfill bans (policy incentives); and
- Operation of material recovery and composting facilities (facility recovery).

The proposed Project would be required to coordinate with the waste hauler to develop collection of recyclable materials for the Project on a common schedule as set forth in applicable local, regional, and State programs. Recyclable materials that could be recycled by the project include paper products, glass, aluminum, and plastic.

Additionally, the proposed Project would be required to comply with applicable elements of AB 1327, Chapter 18 (California Solid Waste Reuse and Recycling Access Act of 1991) and other applicable local, State, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills are reduced in accordance with existing regulations. Therefore, the proposed project is consistent with this policy.

Transportation Chapter

Goal *A more efficient transportation system that reduces and better manages vehicle activity.*

Consistent. The proposed Project would result in the development of residential units (student housing) in close proximity to existing roadways, commercial, and industrial areas. In addition, the Project proposes sidewalks, bicycle/walking corridors, and landscaping treatments to provide for pedestrian and bicycle access throughout the Project site. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity, and CBU's policy that every traditional student must live on campus until the age of 21 further limits the need for vehicle travel. Therefore, this project is consistent with this transportation goal.

Outcome *Reduce the region's vehicle miles traveled from all vehicles and from carbon-based fueled vehicles to 1990 levels by 2020.*

Consistent. As previously identified, the proposed Project would comply with all City development policies, standards, and programs pertaining to supporting alternative modes of transportation included in the Circulation Element of the *General Plan 2025*. For example, the Riverside Transit Agency currently provides bus service to the project site; the RapidLink, Gold Line and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site,

which support the City's General Plan objectives and policies related to alternative modes of transportation. Policy 2.3 of the CBUSP Amendment proposes to design the Magnolia Avenue Corridor as a pedestrian-oriented mixed-use boulevard along the campus frontage. Policies, plans, and/or programs supporting alternative transportation would be reviewed through the City's project review process and incorporated as applicable. Because the project site is located in close proximity to an existing bus route, the proposed project would be accessible to existing transit systems.

A City or sub-region with a jobs-to-housing ratio lower than the overall standard of 1.25 jobs for every household would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the sub-area. These longer commutes result in freeway congestion, increased air pollution, and reduced quality of life for commuters. The 2012 jobs-to-housing ratios for the City, County, and SCAG region are 1.30, 0.89, and 1.25, respectively.[26] These jobs/housing ratios indicate that the City trends towards a slightly more "jobs rich" scenario compared to the SCAG region. Although the Project's proposed increase in student enrollment from 8,414 total students in 2015 to 12,000 total students by 2025 would add student-related vehicular trips over what would have been generated under the existing 2013 CBUSP,[27] implementation of the CBUSP Amendment would result in a "housing rich" jobs-to-housing ratio of 0.99 in a City currently "jobs rich" according to SCAG.

The CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters. Therefore, the proposed project is consistent with the desired regional outcome of this SCAG policy.

Security and Emergency Preparedness Chapter

Goal *Ensure transportation safety, security, and reliability for all people and goods in the region.*

Consistent. The proposed project is consistent with this goal in that the proposed project would be required to adhere to the City of Riverside *General Plan 2025* and all applicable Municipal Code requirements that address transportation safety and security. The *General Plan 2025* contains objectives and policies that aim to provide adequate and reliable transportation

[26] *Demographics & Growth Forecast (Appendix).* 2016-2040 SCAG RTP-SCS. Table 11. Adopted April 7, 2016.
[27] *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. Page 31. City of Riverside. Adopted March 26, 2013.

facilities. The objectives and policies identified in the City's *General Plan 2025* resemble those of the RCP that address mobility, traffic safety, environmental concerns, and land use consistency as the major traffic study factors to identify existing traffic conditions and to assess the future effects on area traffic patterns/flow.

Economy Chapter

Goal *Enable business to be profitable and competitive (locally, regionally, nationally, and internationally).*

Consistent. The proposed Project would add additional students and faculty in close proximity to shopping and work places. Through implementation of the proposed CBUSP Amendment, the City would also expand its economic competitiveness with other areas in the region by enhancing a higher-education institution that would attract professionals to the City and students to where shopping opportunities are. Therefore, the proposed project is consistent with this policy.

Goal *Promote sustained economic health through diversifying the region's economy, strengthening local self-reliance and expanding competitiveness.*

Consistent. As previously stated, the proposed Project would add additional students and faculty in close proximity to shopping and work places. Through implementation of the proposed CBUSP Amendment, the City would also expand its economic competitiveness with other areas in the region by enhancing a higher-education institution that would attract professionals that would be anticipated to raise the median income level for the City and students to where shopping opportunities are, thereby encouraging new businesses in the City. Therefore, the proposed project is consistent with this policy.

Outcome *Increase job growth to add three million jobs to the regional economy by 2035.*

Consistent. Based on a student to faculty/staff ratio of 11.11,[28] the projected increase in students from 8,414 in 2015 to 12,000 by 2025 would yield an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. Since the proposed Project would generate approximately 323 additional jobs in the City, it is consistent with the desired regional outcome of this SCAG policy.

b. Regional Transportation Plan (RTP)

[28] *California Baptist University Specific Plan Amendment. Public Review Draft.* Chapter 4 Section D, Subsection 1. Table 4-3. City of Riverside. August 2018.

The 2016-2040 RTP adopted by the SCAG on April 7, 2016 contains a set of existing socioeconomic projections used as the basis for the SCAG's transportation planning efforts. They include projections of population, housing, and employment at the regional, county, sub-regional, jurisdictional, Census tract, and transportation analysis zone levels. The RTP includes policies and regulations set forth to ensure development within the SCAG regional area is within planned and forecast socioeconomic projections. Goals established within the RTP include the following:

1. Align the plan investments and policies with improving regional economic development and competitiveness (discussed in Section 4.10.5, *Land Use and Planning*, above);
2. Maximize mobility and accessibility for all people and goods in the region (discussed in Section 4.16, *Transportation and Traffic*);
3. Ensure travel safety and reliability for all people and goods in the region (discussed in Section 4.16, *Transportation and Traffic*);
4. Preserve and ensure a sustainable regional transportation system (discussed in Section 4.16, *Transportation and Traffic*);
5. Maximize the productivity of our transportation system (discussed in Section 4.16, *Transportation and Traffic*);
6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking) (discussed in Section 4.3, *Air Quality* and Section 4.16, *Transportation and Traffic*);
7. Actively encourage and create incentives for energy efficiency, where possible (discussed in Section 4.7, *Greenhouse Gas Emissions and Climate Change* and Section 4.18, *Energy Conservation*);
8. Encourage land use and growth patterns that facilitate transit and active transportation (discussed in Section 4.10.5, *Land Use and Planning*, above and Section 4.16, *Transportation and Traffic*);
9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies[29] (discussed in Section 4.16, *Transportation and Traffic*).

The proposed project is consistent with the RTP in that it would be required to adhere to the City of Riverside *General Plan 2025* and Municipal Code governing transportation systems. The General Plan contains objectives and policies that aim to minimize traffic congestion, provide adequate transportation facilities, and require development to pay its share of costs. The

[29] SCAG does not yet have an agreed-upon security performance measure.

objectives and policies identified in the City's *General Plan 2025* resemble those of the RTP that address mobility, traffic safety, environmental concerns, and land use consistency as the major traffic study factors to identify existing traffic conditions and to assess the future effects on area traffic patterns/flow.

c. Sustainable Communities Strategy (SCS) Plan

As part of the adoption of the 2016 RTP, SCAG developed an SCS which was required pursuant to SB 375. According to SB 375, each metropolitan planning organization shall prepare a Sustainable Communities Strategy, including the requirement utilizing the most recent planning assumptions considering local general plans and other factors. The Sustainable Communities Strategy shall:

1. Identify the general location of uses, residential densities, and building intensities within the region;
2. Identify areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of the regional transportation plan taking into account net migration into the region, population growth, household formation and employment growth;
3. Identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region;
4. Identify a transportation network to service the transportation needs of the region;
5. Gather and consider the best practically available scientific information regarding resource areas and farmland in the region;
6. Consider the State housing goals specified in Sections 65580 and 65581;
7. Set forth a forecast development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the State Board; and
8. Allow the regional transportation plan to comply with the Federal Clean Air Act.

The SCS and the 2016 RTP contain new regional growth projections for each city in the Southern California region. Table 4.10-C contains the population and employment forecasts for the City of Riverside.

Table 4.10-C
SCAG Population and Employment Projections – City of Riverside 2012 and 2040

Population		Employment		Increase 2012–2040	
2012 Actual	2040 Projection	2012 Actual	2040 Projection	Population	Employment
310,700	386,600	120,000	200,500	24.4%	67.1%

Source: *Demographics & Growth Forecast (Appendix).* 2016-2040 SCAG RTP-SCS. Table 11. Adopted April 7, 2016.

The 2016–2040 RTP/SCS contains a number of "Performance Measures"[30] that are used to evaluate various regional land use plan alternatives, with the objective being an improvement over the No Project (i.e., no SCS) baseline. These measures are applied on a regional basis, and are not necessarily applicable to individual projects. However, a general discussion of consistency with the relevant measures is provided in Table 4.10-D.

Table 4.10-D
Discussion of RTP/SCS Performance Measures

Performance Measure	Definition	Consistency of Proposed Project
Share of growth in High Quality Transit Areas (HQTAs)	Increase share of the region's growth in households and employment in HQTAs	**Consistent.** The proposed Project is located adjacent to State Route 91 along a HQTA corridor.[31] Implementation of the CBUSP Amendment would result in an increase in students from 8,414 in 2015 to 12,000 by 2025 would yield an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. Local transit has numerous bus routes that serve the City, and lines connect to Metrolink and transit centers in other cities.
Land consumption	Reduce additional land needed for development that has not previously been developed or otherwise affected, including agricultural land, forest land, desert land, and other virgin sites.	**Consistent.** The SCAG plan calls for reducing the amount of virgin land converted to development, as compared to the "No Project" condition. The project would redevelop land currently developed as a university and other institutional (i.e., high school, and preschool) uses. No development of agricultural land, forest land, desert land, and/or other virgin sites is proposed.
Average distance for work or non-work trips	Decrease the average distance traveled for work or non-work trips separately.	**Consistent.** The CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters.
Percentage of work trips less than 3 miles.	Increase the share of total work trips that are fewer than 3 miles.	**Consistent.** As noted above, the CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing

[30] *Performance Measures (Appendix).* 2016-2040 SCAG RTP-SCS, Table 2. Adopted April 7, 2016.
[31] *Ibid.* Exhibit 1.

Table 4.10-D
Discussion of RTP/SCS Performance Measures

Performance Measure	Definition	Consistency of Proposed Project
		relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters.
Work trip length distribution.	Reduce the statistical distribution of work trip length in the region.	**Consistent.** As noted above, the CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters.
Criteria pollutants and greenhouse gas emissions.	Reduce CO, NO_X, $PM_{2.5}$, PM_{10}, VOC, and per capita greenhouse gas emissions (CO_2).	**Consistent.** As detailed in Section 4.3, *Air Quality*, Operation of the proposed project would not exceed SCAQMD regional thresholds for air pollution (Table 4.3.G and Table 4.3.H). As detailed in Section 4.7, *Greenhouse Gas Emissions and Climate Change*, the estimated greenhouse gas (GHG) emissions from project operation would be reduced with implementation of mitigation (see Section 4.7, Mitigation Measures GHG-1 and GHG-2. Therefore, the proposed Project is consistent with this policy.
Annual household transportation cost.	Reduce annual household spending on transportation costs of vehicle ownership, operation, and maintenance, and public transportation.	**Consistent.** As noted above, the CBU policy of students living on campus would reduce commutes to, from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters.
Percentage of jobs within 15 minutes' walk of transit.	Increase the number of jobs within 15 minutes' walk of public transportation.	**Consistent.** The proposed Project site is adjacent to public transportation. The Riverside Transit Agency's RapidLink, Gold Line and Route 1 run along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the Project site.

Source: *Performance Measures (Appendix).* 2016-2040 SCAG RTP-SCS, Table 2. Adopted April 7, 2016.

As detailed in Table 4.10-D, the implementation of the proposed CBUSP Amendment is generally consistent with the SCAG RTP/SCS performance measures,

Title 19 (*Zoning Code*). The proposed CBUSP Amendment is subject to approval by the Approving Authority, per the Zoning Code Chapter 19.650 (*Approving and Appeal Authority*). The provisions of the CBUSP Amendment replace RMC Title 19 (*Zoning Code)* regarding the

use, development, and entitlement of properties. Where the CBUSP Amendment is silent with regard to any land use regulations, the provisions of RMC Title 19 (*Zoning Code)* shall apply. However, the standards and guidelines identified in the CBUSP Amendment shall take precedence over the general standards and guidelines contained in the Zoning Code.

Riverside Municipal Code Chapter 19.820 (Specific Plan/Specific Plan Amendments). According to the City's Municipal Code Section 19.820.040, at a minimum, a specific plan must include a statement of its relationship to the City's General Plan (Section 65451(b)) and text and diagram(s) specifying all of the following in detail:

- The distribution, location, and extent of the uses of land, including open space, within the area covered by the plan.
    - Figure 3-15, *Planned Open Space Network*, of the CBUSP Amendment details the open space within the CBU Specific Plan Zone, and Chapter 3 (*Development Plan*) of the CBUSP Amendment outlines the proposed Land Use Plan and Permit Requirements to achieve CBU's goal of 12,000 enrolled students by the year 2025.
- The proposed distribution, location, extent, and intensity of major components of public and private transportation, sewage, water, drainage, solid waste, disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan.
    - Figure 3-3, *External and Internal Roadways,* of the CBUSP Amendment details the proposed future circulation network to and within the CBU Specific Plan Zone designed to accommodate all modes of mobility and the demands of projected student enrollment. Figure 3-17, *Existing and Planned Potable Water Facilities*, of the CBUSP Amendment details the existing and proposed potable water infrastructure designed to accommodate projected student enrollment and fire-fighting water pressure standards. Figure 3-18, *Existing and Planned Non-Potable Water Facilities*, of the CBUSP Amendment details the existing and proposed non-potable water infrastructure designed for irrigation purposes. Figure 3-19, *Existing and Planned Sewer Facilities*, of the CBUSP Amendment details the existing and proposed potable sewer infrastructure designed to accommodate projected student enrollment and campus development. Figure 3-20, *Storm Drain System*, and Figure 3-21, *Planned Storm Drains*, of the CBUSP Amendment detail the existing and proposed storm drain system designed to reduce flow to the regional storm drain system and capture storm water for beneficial reuse. Additionally, Chapter 3 (*Development Plan*) of the CBUSP Amendment details CBU's essential utilities, such as electricity, natural gas, and solid waste, and Chapter 6 (*Implementation*) provides methods, programs, and financing

mechanisms to be used to maintain and upgrade CBU's essential facilities necessary to support CBU's goal of 12,000 enrolled students by the year 2025.

- Standards and criteria by which development will proceed and standards for the conservation, development, and utilization of natural resources, where applicable.
  - Chapter 4 (*Land Use Regulations and Development Standards*) of the proposed CBUSP Amendment provides land use regulations and development standards[32] intended to support the CBUSP Amendment's objectives and policies as they relate to land use compatibility and to:
    - Provide design parameters for all development in the Specific Plan area;
    - Provide guidance as to the quality and character of individual projects;
    - Offer flexibility to accommodate innovative and unique designs, as well as the evolving and dynamic nature of the University's needs;
    - Promote design creativity and variation while ensuring consistency in building scale, proportion, and pedestrian orientation, as well as the distinct character of the Mission Revival architectural design influence;
    - Create a vibrant environment that complements the surrounding community;
    - Provide transitions between the CBU properties and surrounding non-CBU land uses;
    - Ensure appropriate sensitivity to adjacent single-family residential neighborhoods;
    - Provide visuals cues using landscape buffers and gateway treatments that differentiate the campus from surrounding areas. Buffers can coincide with existing and planned green spaces;
    - Use green space and informal recreation areas to provide transition between the campus and surrounding areas along Magnolia Avenue; and
    - Maintain CBU as a pedestrian-oriented campus.

    Chapter 5 (*Design Guidelines*) of the CBUSP Amendment provides specific design guidelines to guide the architectural, landscape, site furnishing, streetscape, entrance and corner, fence and wall, open space, lighting, signage, and campus art design to ensure a cohesive, aesthetically pleasing, and safe

[32] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 4 Section A. City of Riverside. August 2018.

campus in accordance with the CBUSP Amendment objectives and policies.[33] These design guidelines replace the *Citywide Design and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*.

- A program of implementation measures, including regulations, programs, public works projects, and financing measures necessary to carry out the provisions of the preceding three paragraphs (Section 65451(a)).
    - Chapter 6 (*Implementation*) of the proposed CBUSP Amendment provides methods, programs, and financing mechanisms to be used to implement the objectives, policies, development standards, and design elements in the CBUSP Amendment.[34] The CBU serves as the responsible party, meaning the University's Finance and Administration Department or other department as designated by the Finance and Administration Department, and the implementation timeframe shall be ongoing as individual projects are proposed throughout the 2025 horizon of the Specific Plan. These implementation methods serve as self-mitigating project design features required for all future development and improvement projects under the CBUSP Amendment.

- Any other subjects that, in the judgment of the planning agency, is necessary or desirable for the General Plan implementation (Section 65452) (Ord. 6966 Section 1, 2007).
    - As detailed in Table 4.10-A, the proposed CBUSP Amendment is consistent with the City's *General Plan 2025*. The proposed CBUSP Amendment is subject to review and approval by the City Planning Division of the Community Development Department.

The CBUSP Amendment complies with Chapter 19.820, *Specific Plan/Specific Plan Amendments*, of the City's Municipal Code; all other applicable ordinances of the City shall be adopted by resolution in accordance with the provisions of the City's Municipal Code.

The preceding analysis demonstrates the proposed CBUSP Amendment is consistent with the *General Plan 2025*, and it will not conflict with the *Magnolia Avenue Specific Plan*, Title 19 (*Zoning*) of the RMC, or SCAG-approved regional plans. For these reasons, the proposed Project is generally consistent with the intent and overall goals of the indicated local and regional plans, so impacts to the environment would be **less than significant.** No mitigation is required**.**

[33] *California Baptist University Specific Plan Amendment, Public Review Draft.* Chapter 7 Section A, Subsection 1. Section C-E. Section G. Section H. City of Riverside. August 2018.

[34] *Ibid*. Pages 111 through 124.

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

Refer to Section 4.4-*Biological Resources* for a detailed discussion on the proposed Project's consistency with applicable habitat conservation plans or natural community conservation plans. To reiterate, the Project is subject to compliance with the Western Riverside MSHCP because the City is a Permittee to the MSHCP. The Project site is within the Cities of Riverside and Norco Area Plan of the MSHCP. However, the Project site is not within or adjacent to an MSHCP Criteria Cell, Core, or Linkages, or Public/Quasi Public lands. The proposed Project has no conservation requirements towards building out of the MSHCP Reserve. Since no Conservation Areas are near the Project site, compliance with Section 6.1.4 of the MSHCP is not needed. The Project site does not support any riparian/riverine resources, as defined by Volume 1, Section 6.1.2. of the MSHCP, that would be affected by the proposed Project, and is therefore compliant with Section 6.1.2 of the MSHCP. Additionally, the Project site is not within a Narrow Endemic Plants Survey Areas (NEPSSA) per Section 6.1.3 of the MSHCP; a Criteria Area Species Survey Areas (CASSA) for plant, bird, mammal, and amphibian species. Two locations covered by the SPA planning area contain survey requirements for the burrowing owl. Based on a burrowing owl habitat survey conducted for the two locations, the sites were determined to be unsuitable. The Project will participate in the MSHCP through the payment of the Local Development Mitigation Fee at the time building permits are issued pursuant to provisions of Ordinance No. 6709 of the City Municipal Code and Ordinance No. 810.2 of the County of Riverside. Impacts related to conflict with the MSHCP are **less than significant,** and no mitigation is required.

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

4.10.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to aesthetics have been found to be potentially significant, no mitigation measures are required. Adherence to standard procedures, including applicable objectives and policies of the CBUSP Amendment, *Riverside General Plan 2025*, the *Magnolia Avenue Specific Plan*, Title 19 (*Zoning*) of the RMC, and SCAG-approved regional land use plans, will ensure all impacts related to land use are less than significant.

4.10.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates that the project will not exceed significance criteria for land use impacts. Therefore, all land use impacts are **less than significant**, and no mitigation measures are required.

4.10.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside, *City of Riverside General Plan 2025*. November 2007, Amended November 2012 and March 2013.

City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. December 2007.

City of Riverside. *Green Action Plan.* 2012. http://www.greenriverside.com/about-green-riverside/green-action-plan. (Accessed September 5, 2017).

City of Riverside, *Magnolia Avenue Specific Plan*. Resolution No. 21931. Adopted November 2009.

City of Riverside Municipal Code, *Title 19 - Zoning*. https://www.riversideca.gov/municode/title19.asp. Accessed September 5, 2017.

Southern California Association of Governments (SCAG). *2016-2040 Regional Transportation Plan-Sustainable Communities Strategy.* Adopted April 7, 2016.

4.11 MINERAL RESOURCES

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential impacts to the loss of availability of mineral resources of value to the state, region, or City. No comments regarding mineral resources were received in response to the NOP.

4.11.1 Setting

The entire site has been previously graded and developed with a university and associated facilities and is surrounded by urban development. Surrounding land uses include single-family and multi-family residential, church, and convalescent uses to the north; single-family and multi-family residential, retail, church, and office uses to the east; and single-family and multi-family residential, commercial, and school uses to the west. State Route 91 (SR-91) is located to the south. General commercial uses comprised primarily of automotive dealerships and service centers are located farther south beyond SR-91.

Existing Conditions

Mineral Resource Areas

The City historically featured a significant granitic rock quarrying industry, but these operations ceased several decades ago as urban development supplanted mineral resource extraction in the City. The only area in the City designated by the U.S. Geological Survey as a known significant mineral resource area, defined by the State as Mineral Resources Zone 2 (MRZ-2), is a small section along the northern City boundary generally between Mission Inn Avenue and Main Street between the Santa Ana River and Orange Street.[1] The eastern half of the City is generally designated Mineral Resources Zone 3 (MRZ-3), containing known or inferred mineral occurrences of undetermined mineral resource significance, and the western half of the City is not within a mineral resource area.[2] The Project site is located in the western half of the City not within a mineral resource area; therefore, the Project site is not located in an area defined as a significant mineral resource area.

[1] Open Space and Conservation Element, *Riverside General Plan 2025.* Figure OS-1. City of Riverside. November 2007, Amended November 2012.

[2] *Ibid.* Pages OS-4 and OS-5 and Figure OS-1.

4.11.2 Related Regulations

Federal Regulations

There are no federal regulations regarding mineral resources that are applicable to the proposed Project.

State Regulations

Surface Mining and Reclamation Act of 1975 **(SMARA)** requires classification of land into mineral resource zones (MRZs) according to the known or inferred mineral potential of the area. Construction aggregate resources (sand and gravel) deposits were the first commodity selected for classification by the State Mining and Geology Board. Once mapped, the State Mining and Geology Board is required to designate for future use those areas that contain aggregate deposits that are of prime importance in meeting the region's future need for construction-quality aggregates. There are three key objectives of SMARA regulations:

- Adverse environmental effects are prevented or minimized, and mined lands are reclaimed to a usable condition that is readily adaptable for alternative uses;
- The production and conservation of minerals are encouraged, while consideration is given to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment; and
- Residual hazards to the public health and safety are eliminated.

The primary objective of the SMARA is for each jurisdiction to develop policies that will conserve important mineral resources, where feasible, that might otherwise be unavailable when needed. The SMARA requires that once policies are adopted, local agency land use decisions must be in accordance with its mineral resource management policies. These decisions must also balance the mineral value of the resource to the market region as a whole, not just their importance to the local jurisdiction. Under SMARA, areas are categorized into four MRZs as follows:

MRZ-1 Areas where the available geologic information indicates no significant mineral deposits or a minimal likelihood of significant mineral deposits.

MRZ-2a Areas where the available geologic information indicates that there are significant mineral deposits.

MRZ-2b Areas where the available geologic information indicates that there is a likelihood of significant mineral deposits.

MRZ-3a Areas where the available geologic information indicates that mineral deposits are known to exist, however, the significance of the deposit is undetermined.

MRZ-3b Areas where the available geologic information indicates that mineral deposits are inferred to exist, however, the significance of the deposit is undetermined.

MRZ-4 Areas where there is not enough information available to determine the presence or absence of mineral deposits.

Mineral Resources and Mineral Hazards Mapping Program **(MRMHMP)** provides data about nonfuel mineral resources, naturally occurring mineral hazards (such as asbestos, radon, and mercury), and historic mining activities throughout the state. The MRMHMP is divided into two projects; the Mineral Resources Project, which provides information about California's nonfuel mineral resources, and the Mineral Hazards Project, which maps and monitors minerals related to public health and safety concerns.

Local Regulations

City of Riverside General Plan 2025 contains overarching objectives and policies regarding open space preservation designed to reduce potential environmental impacts to mineral resources. Due to the proposed Project's fully urbanized and developed nature, none of these objectives and policies would apply to the proposed Project.

4.11.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on mineral resources if it would:

- (Threshold A) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State;
- (Threshold B) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plans.

Methodology

The California Geological Survey (CGS) provides objective geologic information about California's diverse non-fuel mineral resources. Maps, reports, and other data products developed by CGS were used to locate mineral extraction areas in the Project area. In addition, the City's *General Plan 2025* was used to determine the location of possible mineral extraction areas in the Project area.

4.11.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through the design. The project site has been previously graded, is fully developed with a university and associated facilities, and is completely surrounded by urban development. As such, the proposed Project does not include any Project design features regarding mineral resources.

4.11.5 Environmental Impacts Before Mitigation

Threshold A: Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

The Project site is not located within a mineral resource area,[3] and there are no known mineral resources on the Project site. The Project site has been previously graded, is fully developed with a university and associated facilities, and is completely surrounded by urban development. Therefore, implementation of the proposed Project would not result in the loss of identified regional or local mineral resources, conversion of an identified mineral resource use, or conflict with existing mineral resource extraction activities. The proposed Project would have **no impact** to known mineral resources of value or to a locally important mineral resource recovery site. No mitigation is required.

Threshold B: Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plans?

There are no specific areas within the City or its Sphere of Influence designated locally-important mineral resource recovery sites.[4,5] The Project site is not located within a mineral resource area. The Project site has been previously graded, is fully developed with a university and associated facilities, and is completely surrounded by urban development. Therefore, the proposed Project would not result in a loss of availability of a locally important mineral resource recovery site delineated on a local general plan or specific plan. **No impacts** would occur. No mitigation is required.

---

3 Open Space and Conservation Element, *Riverside General Plan 2025*. Figure OS-1. City of Riverside. November 2007, Amended November 2012.

4 Section 5.10 - Mineral Resources. *Riverside General Plan 2025 Final Program Environmental Impact Report*. Page 5.10-6. City of Riverside. December 2007.

5 Third Addendum to the Certified Final Program Environmental Impact Report (PEIR) for the General Plan 2025 Program. Page 25. City of Riverside, Resolution Number 22360. March 20, 2012.

4.11.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to mineral resources would occur, no mitigation measures are required.

4.11.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates the Project will have no impacts to mineral resources. Therefore, no mitigation measures are required.

4.11.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

City of Riverside. *California Baptist University Specific Plan Amendment, Public Review Draft.* August 2018.

City of Riverside. *City of Riverside General Plan 2025*. November 2007, Amended November 2012.

City of Riverside. *City of Riverside General Plan 2025 and Supporting Documents Final Program Environmental Impact Report*. December 2007.

City of Riverside. Third Addendum to the Certified Final Program Environmental Impact Report (PEIR) for the General Plan 2025 Program. Resolution Number 22360. March 20, 2012.

THIS PAGE INTENTIONALLY LEFT BLANK

4.12 NOISE AND VIBRATION

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential adverse impacts to noise and vibration. No comments regarding noise and vibration were received in response to the NOP. The analysis contained in this section is based upon the following report:

- *Noise and Vibration Analysis, California Baptist University,* LSA, December 2017 (EIR Appendix E).

4.12.1 Setting

Existing Conditions

Characteristics of Sound. Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, and sleep.

To the human ear, sound has two significant characteristics: pitch and loudness. Pitch is generally an annoyance, while loudness can affect the ability to hear. Pitch is the number of complete vibrations, or cycles per second, of a wave resulting in the tone's range from high to low. Loudness is the strength of a sound that describes a noisy or quiet environment and is measured by the amplitude of the sound wave. Loudness is determined by the intensity of the sound waves combined with the reception characteristics of the human ear. Sound intensity refers to how hard the sound wave strikes an object, which in turn produces the sound's effect. This characteristic of sound can be precisely measured with instruments. The analysis of a project defines the noise environment of the project area in terms of sound intensity and its effect on adjacent sensitive land uses.

Measurement of Sound. Sound intensity is measured through the A-weighted scale to correct for the relative frequency response of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear's de-emphasis of these frequencies. Unlike linear units (e.g., inches or pounds), decibels are measured on a logarithmic scale representing points on a sharply rising curve.

For example, 10 decibels (dB) is 10 times more intense than 1 dB, 20 dB is 100 times more intense than 1 dB, and 30 dB is 1,000 times more intense than 1 dB. Thirty decibels (30 dB) represent 1,000 times as much acoustic energy as 1 dB. The decibel scale increases as the square of the change, representing the sound pressure energy. A sound as soft as human breathing is about 10 times greater than 0 dB. The decibel system of measuring sound gives a rough connection between the physical intensity of sound and its perceived loudness to the human ear.

A 10 dB increase in sound level is perceived by the human ear as only a doubling of the loudness of the sound. Ambient sounds generally range from 30 dB (very quiet) to 100 dB (very loud).

Sound levels are generated from a source, and their decibel level decreases as the distance from that source increases. Sound dissipates exponentially with distance from the noise source. For a single-point source, sound levels decrease approximately 6 dB for each doubling of distance from the source. This drop-off rate is appropriate for noise generated by stationary equipment. If noise is produced by a line source (e.g., highway traffic or railroad operations) the sound decreases 3 dB for each doubling of distance in a hard site environment. Similarly, line sources with intervening absorptive vegetation or line sources that are located at a great distance to the receptor would decrease 4.5 dB for each doubling of distance, which is consistent with information provided in the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA RD 77 108).

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. The equivalent continuous sound level (L_{eq}) is the total sound energy of time-varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the L_{eq} and Community Noise Equivalent Level (CNEL) or the day-night average noise level (L_{dn}) based on A weighted decibels (dBA). CNEL is the time-varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours), and a 10 dBA weighting factor applied to noises occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). L_{dn} is similar to the CNEL scale but without the adjustment for events occurring during the evening hours. CNEL and L_{dn} are within 1 dBA of each other and are normally interchangeable. The City uses the CNEL noise scale for long-term noise impact assessment.

Other noise rating scales of importance when assessing the annoyance factor include the maximum instantaneous noise level (L_{max}), which is the highest exponential time-averaged sound level that occurs during a stated time period. The noise environments discussed in this analysis for short-term noise impacts are specified in terms of maximum levels denoted by L_{max}, which reflects peak operating conditions and addresses the annoying aspects of intermittent noise. L_{max} is often used together with another noise scale or noise standards in terms of percentile noise levels in noise ordinances for enforcement purposes. For example, the L10 noise level represents the noise level exceeded 10 percent of the time during a stated period. The L50 noise level represents the median noise level (i.e., half the time the noise level exceeds this level, and half the time it is less than this level). The L90 noise level represents the noise level exceeded 90 percent of the time and is considered the background noise level during a monitoring period. For a relatively constant noise source, the L_{eq} and L50 are approximately the same.

The human perception of noise level increases can be described in three categories:

- Inaudible/Not Perceptible: Changes in noise levels of less than 1 dB are inaudible to the human ear and often referred to as not perceptible.

- Potentially Audible/Barely Perceptible: A potentially audible impact refers to a 1 dB to 3 dB change in noise levels. This range of noise levels has been found to be noticeable in low-noise environments.

- Audible/Readily Perceptible: An audible impact refers to a noticeable increase in noise for humans. Audible increases in noise levels generally refer to a change of 3 dB or greater because this level has been found to be readily perceptible in exterior environments. For reference, a 10 dB increase is experienced by humans as a doubling of sound or perceived to be twice as loud.

Only readily perceptible changes in existing ambient or background noise levels are considered potentially significant.

Physiological Effects of Noise. Exposure to prolonged high noise levels has been found to have effects on human health (Suter 1991; World Health Organization 1999), including physiological and psychological effects to humans. Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects the entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions, thereby affecting blood pressure and functions of the heart and the nervous system. In comparison, extended periods of noise exposure above 90 dBA would result in permanent cell damage. When the noise level reaches 120 dBA, a tickling sensation occurs in the human ear, even with short-term exposure. This level of noise is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation is replaced by the feeling of pain in the ear (the threshold of pain). A sound level of 160–165 dBA will result in dizziness or loss of equilibrium. The ambient or background noise problem is widespread and is generally more concentrated in urban areas than in outlying, less developed areas. Table 4.12.A provides definitions of acoustical terms, and Table 4.12.B identifies common sound levels and their sources. Table 4.12.C illustrates the City's General Plan land use noise compatibility criteria.

Table 4.12.A
Definitions of Acoustical Terms

Term	Definitions
Decibel, dB	A unit of measurement that denotes the ratio between two quantities that are proportional to power; the number of decibels is 10 times the logarithm (to the base 10) of this ratio.
Frequency, Hz	Of a function periodic in time, the number of times that the quantity repeats itself in 1 second (i.e., number of cycles per second).
A-Weighted Sound Level, dBA	The sound level obtained by use of A-weighting. The A-weighting filter deemphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise. (All sound levels in this report are A-weighted, unless reported otherwise.)
L_{01}, L_{10}, L_{50}, L_{90}	The fast A-weighted noise levels that are equaled or exceeded by a fluctuating sound level 1%, 10%, 50%, and 90% of a stated time period.
Equivalent Continuous Noise Level, L_{eq}	The level of a steady sound that, in a stated time period and at a stated location, has the same A-weighted sound energy as the time-varying sound.
Community Noise Equivalent Level, CNEL	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 5 dBA to sound levels occurring in the evening from 7:00 PM to 10:00 PM and after the addition of 10 dBA to sound levels occurring in the night between 10:00 PM and 7:00 AM.
Day/Night Noise Level, L_{dn}	The 24-hour A-weighted average sound level from midnight to midnight, obtained after the addition of 10 dBA to sound levels occurring in the night between 10:00 PM and 7:00 AM.
L_{max}, L_{min}	The maximum and minimum A-weighted sound levels measured on a sound level meter, during a designated time interval, using fast time averaging.
Ambient Noise Level	The all-encompassing noise associated with a given environment at a specified time; usually a composite of sound from many sources at many directions, near and far; no particular sound is dominant.
Intrusive	The noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence and tonal or informational content, as well as the prevailing ambient noise level.

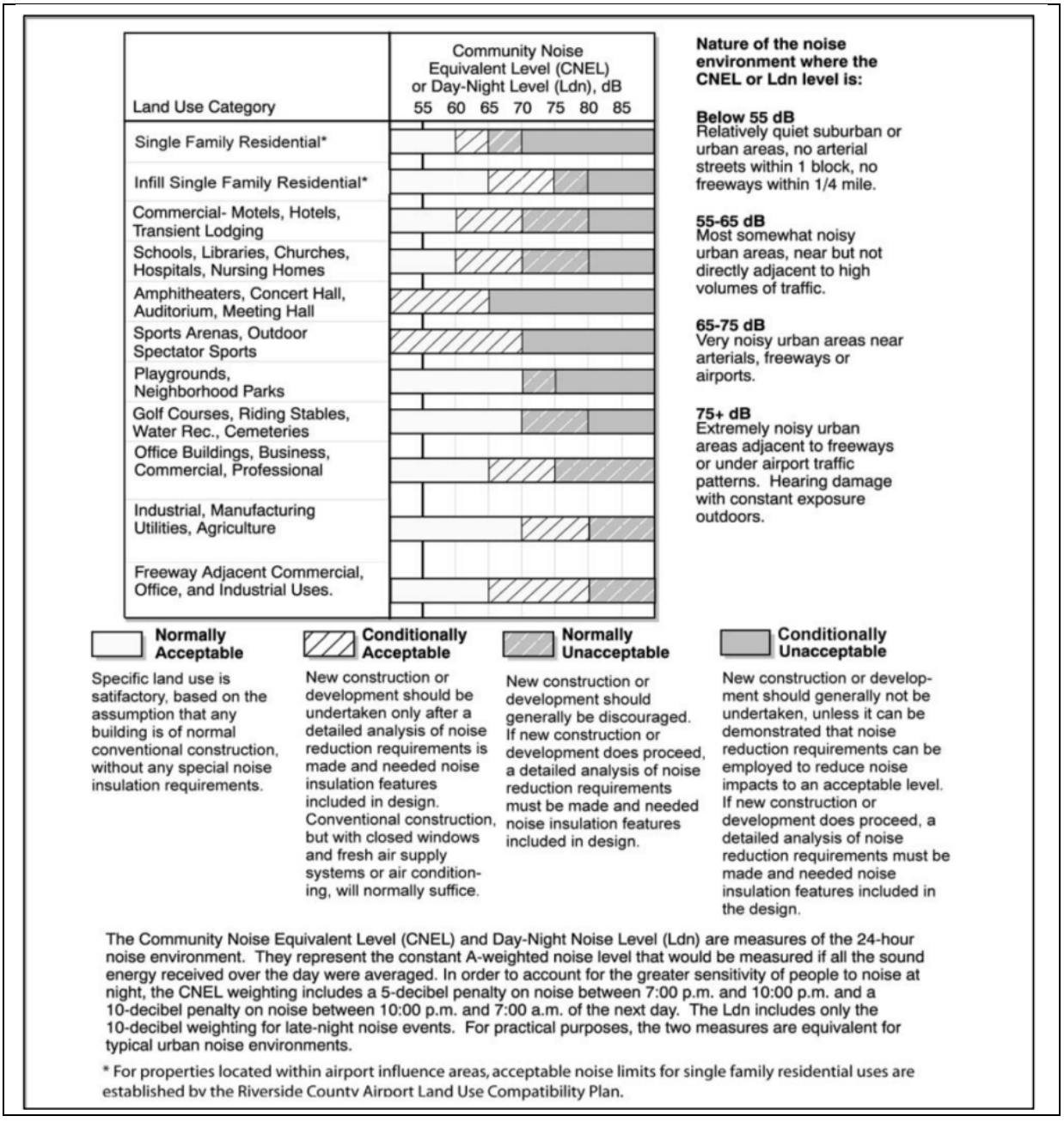
Source: *Handbook of Acoustical Measurements and Noise Control* (Harris 1991).

Table 4.12.B
Common Sound Levels and Their Noise Sources

Noise Source	A-Weighted Sound Level in Decibels	Noise Environments	Subjective Evaluations
Near Jet Engine	140	Deafening	128 times as loud
Civil Defense Siren	130	Threshold of Pain	64 times as loud
Hard Rock Band	120	Threshold of Feeling	32 times as loud
Accelerating Motorcycle at a Few Feet Away	110	Very Loud	16 times as loud
Pile Driver; Noisy Urban Street/Heavy City Traffic	100	Very Loud	8 times as loud
Ambulance Siren; Food Blender	95	Very Loud	—
Garbage Disposal	90	Very Loud	4 times as loud
Freight Cars; Living Room Music	85	Loud	—
Pneumatic Drill; Vacuum Cleaner	80	Loud	2 times as loud
Busy Restaurant	75	Moderately Loud	—
Near Freeway Auto Traffic	70	Moderately Loud	—
Average Office	60	Quiet	One-half as loud
Suburban Street	55	Quiet	—
Light Traffic; Soft Radio Music in Apartment	50	Quiet	One-quarter as loud
Large Transformer	45	Quiet	—
Average Residence without Stereo Playing	40	Faint	One-eighth as loud
Soft Whisper	30	Faint	—
Rustling Leaves	20	Very Faint	—
Human Breathing	10	Very Faint	Threshold of Hearing
—	0	Very Faint	—

Source: Table C – Noise and Vibration Impact Analysis, LSA, December 2017

Table 4.12.C
Land Use Compatibility Criteria



Source: California Office of Noise Control, Guidelines for the Preparation and Content of Noise Element of the General Plan (February 1976).

Vibration. Vibration refers to groundborne noise and perceptible motion. Groundborne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible. Typically, there is more adverse reaction to effects associated with the shaking of a building. Vibration energy propagates from a source through intervening soil and rock layers to the foundations of nearby buildings. The vibration then propagates from the foundation throughout the remainder of the structure. Building vibration may be perceived by occupants as the motion of building surfaces, the rattling of items on shelves or hanging on walls, or a low-frequency rumbling noise. The rumbling noise is caused by the vibration of walls, floors, and ceilings that radiate sound waves. Annoyance from vibration often occurs when the vibration exceeds the threshold of perception by 10 dB or less. This is an order of magnitude below the damage threshold for normal buildings.

Typical sources of groundborne vibration are construction activities (e.g., blasting, pile driving, and operating heavy-duty earthmoving equipment), steel-wheeled trains, and occasional traffic on rough roads. Problems with both groundborne vibration and noise from these sources are usually localized to areas within approximately 100 feet from the vibration source, although there are examples of groundborne vibration causing interference out to distances greater than 200 feet (Federal Transit Administration [FTA] 2006). When roadways are smooth, vibration from traffic, even heavy trucks, is rarely perceptible. For most projects, it is assumed that the roadway surface will be smooth enough that groundborne vibration from street traffic will not exceed the impact criteria; however, the construction of the project could result in groundborne vibration that may be perceptible and annoying.

Groundborne vibration has the potential to disturb people and damage buildings. Although it is very rare for typical construction activities to cause even cosmetic building damage, it is not uncommon for construction processes (e.g., blasting and pile driving) to cause vibration of sufficient amplitudes to damage nearby buildings (FTA 2006). Groundborne vibration is usually measured in terms of vibration velocity, either the root-mean-square (RMS) velocity or peak particle velocity (PPV). The RMS is best for characterizing human response to building vibration, and PPV is used to characterize potential for damage. Decibel notation acts to compress the range of numbers required to describe vibration.

Factors that influence groundborne vibration and noise include the following:

- Vibration Source: Vehicle suspension, wheel types and condition, railroad track/roadway surface, railroad track support system, speed, transit structure, and depth of vibration source.
- Vibration Path: Soil type, rock layers, soil layering, depth to water table, and frost depth.
- Vibration Receiver: Foundation type, building construction, and acoustical absorption.

Among the factors listed above, there are significant differences in the vibration characteristics when the source is underground compared to when the source is at the ground surface. In addition, soil conditions are known to have a strong influence on the levels of groundborne vibration. Among the most important factors are the stiffness and internal damping of the soil and the depth to bedrock.

Experience with groundborne vibration indicates that (1) vibration propagation is more efficient in stiff clay soils than in loose sandy soils and (2) shallow rock seems to concentrate the vibration energy close to the surface and can result in groundborne vibration problems at large distances from a railroad track. Factors such as the layering of the soil and the depth to the water table can have significant effects on the propagation of groundborne vibration. Soft, loose, sandy soils tend to attenuate more vibration energy than hard rocky materials. Vibration propagation through groundwater is more efficient than through sandy soils.

Existing Noise Environment. In Riverside, vehicle traffic is the primary source of noise. Other significant local noise sources include railroad noise, airport noise, industrial noise, construction noise, mechanical equipment noise, portable power noise, and amplified sound. The General Plan includes future 2025 noise contours attributable to roadway traffic, freeway traffic, railroad, and airport activity. As identified in Figure N-8 of the General Plan, due to the adjacent freeway (State Route 91), the southern portion of the project site (CBU Specific Plan Zone) is subject to noise levels reaching 70 dBA CNEL, the middle portion of the CBU Specific Plan Zone is subject to noise levels reaching 65 dBA CNEL, and the northern portion of the CBU Specific Plan Zone is subject to noise levels reaching 60 dBA CNEL.

Vehicular Traffic Noise. Major contributing roadway noise sources in the project vicinity include State Route 91, Adams Street, Magnolia Avenue, Monroe Street, and Diana Avenue, Campus View Drive, Garfield Street, Indiana Avenue, Jackson Street, Jefferson Street, Lincoln Avenue, and Overland Street. Existing roadway traffic noise levels in the project vicinity were assessed using the Federal Highway Administration (FHWA) highway traffic noise prediction model (FHWA RD-77-108). This model uses a typical vehicle mix for urban/suburban areas in California and requires parameters, including traffic volumes, vehicle speed, and roadway geometry, to compute typical equivalent noise levels during daytime, evening, and nighttime hours. The resultant noise levels are weighted and summed over 24-hour periods to determine the community noise equivalent level (CNEL) values. Existing traffic noise contours along modeled roadway segments are shown in Table 4.12.D. These noise levels represent the worst-case scenario, which assumes that no shielding is provided between the traffic and the location where the noise contours are drawn. As detailed in Table 4.12.D, the highest modeled traffic noise level along the CBU campus boundary measured 50 feet from the centerline of the outermost lane reaches approximately 68.7 dBA CNEL along Adams Street.

Table 4.12.D
Existing Traffic Noise Levels Without Project

Roadway Segment	ADT	Centerline to 70 dBA CNEL (feet)	Centerline to 65 dBA CNEL (feet)	Centerline to 60 dBA CNEL (feet)	CNEL (dBA) 50 feet from Centerline of Outermost Lane
Magnolia Avenue – Jackson Street. to Overland Street	25,078	58	115	244	68.1
Magnolia Avenue - Overland St to Monroe Street	24,128	56	112	238	67.9
Magnolia Avenue - Monroe Street to Campus Bridge Drive	24,089	56	112	237	67.9
Magnolia Avenue - Campus Bridge Drive to Adams Street	27,104	60	121	257	68.4
Magnolia Avenue - Adams Street to Jefferson Street	27,045	60	121	256	68.4
Monroe Street - Garfield to Magnolia Avenue	10,129	< 50	62	133	65.7
Monroe Street - Magnolia Avenue to Diana Avenue	8,983	< 50	58	123	64.6
Monroe Street - Diana Avenue to Indiana Avenue	9,212	< 50	59	125	64.7
Adams Street - Garfield Street to Magnolia Avenue	20,172	< 50	100	211	67.2
Adams Street - Magnolia Avenue to Briarwood Drive	28,449	62	125	265	68.7
Adams Street - Briarwood Drive to Diana Avenue	27,957	61	123	262	68.6
Adams Street - Diana Avenue to Freeway 91 Ramps	27,939	61	123	262	68.6
Adams Street - Freeway 91 Ramps to Indiana Avenue	27,074	60	121	256	68.4
Adams Street - Indiana Avenue to Lincoln Avenue	14,926	< 50	83	173	65.8
Diana Avenue - Monroe Street to Campus View	2,689	< 50	< 50	55	59.9

Table 4.12.D
Existing Traffic Noise Levels Without Project

Roadway Segment	ADT	Centerline to 70 dBA CNEL (feet)	Centerline to 65 dBA CNEL (feet)	Centerline to 60 dBA CNEL (feet)	CNEL (dBA) 50 feet from Centerline of Outermost Lane
Diana Avenue - Campus View to Adams Street	3,522	< 50	< 50	66	61.1
Campus Bridge Drive - Magnolia Ave to Lancer Lane	8,688	< 50	< 50	< 50	55.2
Campus View - Lancer Lane to Diana Avenue	3,301	< 50	< 50	< 50	51.0
Lancer Lane - Campus Bridge Drive to Adams Street	2,830	< 50	< 50	< 50	49.0

Source: Table J – Noise and Vibration Impact Analysis, LSA, December 2017
Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.
ADT = average daily traffic dBA = A-weighted decibels
CNEL = Community Noise Equivalent Level

Stationary Source Noise. Stationary source noise on campus is primarily associated with heating and ventilation equipment, parking lot activities, and athletic and performance art/amphitheater events. Although it may be possible that noise impacts associated with those uses, including mechanical equipment starting and stopping, vehicle doors slamming, people conversing, and fans cheering at sporting events may sporadically be audible, noise within and surrounding the CBU Specific Plan Zone is dominated by traffic noise from State Route 91, Adams Street, Magnolia Avenue, Monroe Street, and Diana Avenue.

Aircraft Noise. Airport related noise levels are primarily associated with aircraft engine noise made while aircraft are taking off, landing, or running their engines while still on the ground. The closest airport to CBU is Riverside Municipal Airport (RAL) located approximately 1.3 miles north of the Project site. Aircraft noise is occasionally audible within the CBU Specific Plan Zone; however, no portion of the CBU campus lies within the 55 dBA CNEL noise contours of the airport.[1]

Sensitive Land Uses in the Project Vicinity. The Project is located within an area that is predominantly developed with single-family homes, apartments, offices, schools, open space, and religious institutions. The nearest sensitive receptors to the CBU Specific Plan Zone are existing on-campus student housing and academic facilities, as well as educational facilities (Chemawa Middle School located at 8830 Magnolia Avenue and Sherman Indian High School located at 9010 Magnolia Avenue) and single-family and multi-family residences located

[1] Figure N-8 – Riverside and Flabob Airport Noise Contours, City of Riverside General Plan, November 2007.

adjacent to the properties within the CBU Specific Plan Zone, some of which are between 10 and 25 feet from certain CBU properties (e.g., River Springs Charter School located at 8775 Magnolia Avenue and Engineering Building located at 3739 Adams Street, respectively).

4.12.2 Related Regulations

Federal Regulations

Noise Control Act. In 1972, Congress enacted the Noise Control Act. This act authorized the United States Environmental Protection Agency (U.S. EPA) to publish descriptive data on the effects of noise and establish levels of sound requisite to protect the public welfare with an adequate margin of safety. These levels are separated into health (hearing loss levels) and welfare (annoyance levels). The U.S. EPA cautions that these identified levels are not standards because they do not take into account the cost or feasibility of the levels.

For protection against hearing loss, 96 percent of the population would be protected if sound levels are less than or equal to an L_{eq} (24) of 70 dBA. The "(24)" signifies an L_{eq} duration of 24 hours. The U.S. EPA activity and interference guidelines are designed to ensure reliable speech communication at about 5 feet in the outdoor environment for outdoor and indoor environments, interference with activity and annoyance should not occur if levels are below 55 dBA and 45 dBA, respectively.

At 55 dBA L_{dn}, 95 percent sentence clarity (intelligibility) may be expected at 11 feet, and no community reaction. However, 1 percent of the population may complain about noise at this level, and 17 percent may indicate annoyance.

State Regulations

Noise Insulation Standards. The State of California has established regulations that help prevent adverse impacts to occupants of buildings located near noise sources. Referred to as the State Noise Insulation Standard, it requires buildings to meet performance standards through design and/or building materials that would offset any noise source in the vicinity of the receptor. State regulations include requirements for the construction of new hotels, motels, apartment houses, and dwellings other than detached single-family dwellings that are intended to limit the extent of noise transmitted into habitable spaces. These requirements are found in the California Code of Regulations, Title 24 (known as the Building Standards Administrative Code), Part 2 (known as the California Building Code), Appendix Chapters 12 and 12A. For limiting noise transmitted between adjacent dwelling units, the noise insulation standards specify the extent to which walls, doors, and floor ceiling assemblies must block or absorb sound. For limiting noise from exterior noise sources, the noise insulation standards set an interior standard of 45 dBA CNEL in any habitable room with all doors and windows closed. In addition, the standards require preparation of an acoustical analysis demonstrating the manner in which dwelling units

have been designed to meet this interior standard, where such units are proposed in an area with exterior noise levels greater than 60 dBA CNEL.

Local Regulations

As discussed below, the City has adopted and modified the State's land use compatibility guidelines for determining acceptable noise levels for specified land uses.

City of Riverside General Plan 2025. The City of Riverside addresses noise in the Noise Element of the General Plan. The objectives and policies in the Noise Element aim to minimize noise levels from point sources throughout the community, minimize transportation-related noise, and mitigate the effects of noise to provide a safe and healthful environment. Although listed here, each of these objectives and policies are presented in Table 4.10.A of the Land Use and Planning Section of the EIR with an evaluation of the Project's consistency with the stated objectives and policies.

Land Use Element

Objective LU-22: Avoid land use/transportation decisions that would adversely impact the long-term viability of the March Air Reserve Base/March Inland Port, Riverside Municipal and Flabob Airports.

Policy LU-22.3 Work to limit the encroachment of uses that potentially pose a threat to continued airport operations, including intensification of residential and/or commercial facilities within identified airport safety zones and areas already impacted by current or projected airport noise.

Noise Element

Objective N-1: Minimize noise levels from point sources throughout the community and, wherever possible, mitigate the effects of noise to provide a safe and healthful environment.

Policy N-1.1 Continue to enforce noise abatement and control measures particularly within residential neighborhoods.

Policy N-1.2 Require the inclusion of noise-reducing design features in development consistent with standards in Figure N–10 (Noise/Land Use Compatibility Criteria), Title 24 California Code of Regulations and Title 7 of the Municipal Code.

Policy N-1.3 Enforce the City of Riverside Noise Control Code to ensure that stationary noise and noise emanating from construction activities, private developments/residences and special events are minimized.

Policy N-1.4 Incorporate noise considerations into the site plan review process, particularly with regard to parking and loading areas, ingress/egress points and refuse collection areas.

Policy N-1.5 Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas.

Policy N-1.7 Evaluate noise impacts from roadway improvement projects by using the City's Acoustical Assessment Procedure.

Policy N-1.8 Continue to consider noise concerns in evaluating all proposed development decisions and roadway projects.

Objective N-2: Minimize the adverse effects of airport-related noise through proper land use planning.

Policy N-2.1 Ensure that new development can be made compatible with the noise environment by using noise/land use compatibility standards (Figure N–10 – Noise/Land Use Noise Compatibility Criteria) and the airport noise contour maps (found in the Riverside County Airport Land Use Compatibility Plans) as guides to future planning and development decisions.

Policy N-2.2 Avoid placing noise-sensitive land uses (e.g., residential uses, hospitals, assisted living facilities, group homes, schools, day care centers, etc.) within the high noise impact areas (over 60 dB CNEL) for Riverside Municipal Airport and Flabob Airport in accordance with the Riverside County Airport Land Use Compatibility Plan.

Policy N-2.5 Utilize the Airport Protection Overlay Zone, as appropriate, to advise landowners of special noise considerations associated with their development.

Objective N-4: Minimize ground transportation-related noise impacts.

Policy N-4.1 Ensure that noise impacts generated by vehicular sources are minimized through the use of noise reduction features (i.e., earthen berms, landscaped walls, lowered streets, improved technology).

Policy N-4.5 Use speed limit controls on local streets as appropriate to minimize vehicle traffic noise.

City of Riverside Municipal Code. The City sets noise and land use compatibility guidelines, as detailed in previously referenced Table 4.12.C. Chapter 7 of the RMC addresses stationary and construction noise.

Sections 7.25.010 and 7.30.015 of the RMC limit interior and exterior noise attributable from stationary sources. No person shall create any sound, or allow the creation of any sound, on any property that causes a change in the sound level on any other occupied property to exceed the sound level standards as identified below. Table 4.12.E shows the City's exterior noise standards and Table 4.12.F shows the City's interior noise level standards.

Table 4.12.E
Exterior Noise Standards

Land Use Category	Time Period	Noise Level
Residential	Night (10:00 p.m. to 7:00 a.m.) Day (7:00 a.m. to 10:00 p.m.)	45 dBA 55 dBA
Office/commercial	Any time	65 dBA
Industrial	Any time	70 dBA
Community support	Any time	60 dBA
Public recreation facility	Any time	65 dBA
Nonurban	Any time	70 dBA

Source: City of Riverside, 2017. Municipal Code Section 7.25.010.

Any noise exceeding the following is prohibited:

- The exterior noise standard of the applicable land use category, plus up to five decibels, for a cumulative period of more than thirty minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus five decibels for a cumulative period of more than fifteen minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus ten decibels, for a cumulative period of more than five minutes in any hour; or
- The exterior noise standard of the applicable land use category, plus fifteen decibels, for a cumulative period of more than one minute in any hour; or
- The exterior noise standard for the applicable land use category, plus twenty decibels or the maximum measured ambient noise level, for any period of time.

The normally acceptable exterior noise level for single-family residential and school uses is 60 dBA CNEL. Noise levels of 60 to 65 dBA CNEL are considered conditionally acceptable for single-family residential uses, and noise levels of 60 to 70 dBA CNEL are considered conditionally acceptable for school uses when a detailed analysis of noise reduction requirements and noise insulation features are included in the design to meet the interior noise standard. For amphitheater land uses, the conditionally acceptable noise level is up to 65 dBA CNEL and the conditionally unacceptable exterior noise level is above 65 dBA CNEL. For athletic field land uses, the conditionally acceptable exterior noise level is up to 70 dBA CNEL and the conditionally unacceptable exterior noise level is above 70 dBA CNEL. In addition, for office

land uses, the normally acceptable exterior noise level is up to 65 dBA CNEL, the conditionally acceptable exterior noise level is between 65 and 75 dBA CNEL and the normally unacceptable exterior noise level is above 75 dBA CNEL.

Table 4.12.F
Interior Noise Standards

Land Use Category	Time Period	Noise Level
Residential	Night (10:00 p.m. to 7:00 a.m.) Day (7:00 a.m. to 10:00 p.m.)	35 dBA 45 dBA
School	7:00 a.m. to 10:00 p.m. (while school is in session)	45 dBA
Hospital	Any time	45 dBA

Source: City of Riverside, 2017. Municipal Code Section 7.30.015.

Section 7.25.010 also identifies air-conditioning noise and specifies that where the intruding noise source is an air-conditioning unit or refrigeration system, the exterior noise level when measured at the property line shall not exceed 60 dBA for units installed before 1-1-1980 and 55 dBA for units installed after 1-1-1980.

Construction Hours. Section 7.35.010.B(5) of Title 7 the RMC (Noise Control) requires construction activities to be restricted within the City to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. on Saturdays; construction activities are prohibited on Sundays and federal holidays. Section 7.35.020.G - Exemptions states, "Noise sources associated with construction, repair, remodeling, or grading of any real property; provided a permit has been obtained from the City as required; and provided said activities do not take place between the hours of 7:00 p.m. and 7:00 a.m. on weekdays, between the hours of 5:00 p.m. and 8:00 a.m. on Saturdays, or at any time on Sunday or a federal holiday" are exempt from the noise level limits of the RMC.

4.12.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on noise and vibration if:

- (Threshold A) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- (Threshold B) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;

- (Threshold C) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- (Threshold D) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- (Threshold E) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels; or
- (Threshold F) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels.

Methodology

The evaluation of noise impacts associated with the proposed project includes the following:

- Determination of the short-term construction noise impacts on off-site noise-sensitive uses;
- Determination of the long-term noise impacts, including vehicular traffic and stationary noise sources, on-site and off-site noise-sensitive uses; and
- Determination of the required mitigation measures to reduce short-term construction and long-term noise impacts from all sources.

The guidelines included in the FHWA Highway Traffic Noise Prediction Model (1977; FHWA RD-77-108) were used to evaluate highway traffic-related noise conditions along roadway segments in the project vicinity. The standard vehicle mix for Southern California roadways was used for traffic on these roadway segments. These traffic noise levels are representative of a worst-case scenario, which assumes a flat terrain and no shielding between the traffic and the noise contours.

4.12.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through design. The proposed CBUSP Amendment outlines design elements that guide development to be sensitive to noise-sensitive receptors.

CBUSP Amendment Objectives and Policies

Development of the CBU campus and associated facilities is currently administered pursuant to the 2013 CBUSP, adopted March 26, 2013 under Resolution No. 22511 and Ordinance No. 7203 pursuant to specific objectives and policies designed to foster a positive relationship between CBU

and the larger community in which it resides.[2] The proposed CBUSP Amendment will replace the 2013 CBUSP in its entirety to facilitate a more urban-style development schema, but the objectives and policies proposed in Chapter 2 (*Planning Framework*) of the CBUSP Amendment pertaining to noise mirror those under which CBU development is currently administered.

Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined [in the CBUSP Amendment].

CBUSP Amendment Development Plan

In accordance with Objective 2 and Policy 2.1, Chapter 3 (*Development Plan*) of the proposed CBUSP Amendment provides a development plan for campus boundary and facility expansions in order to facilitate an increase in student enrollment. The land use plan will ensure CBU is equipped with reconfigured educational, housing, administrative support, athletic, and other facilities to support CBU's goal of 12,000 students by the year 2025 while taking into consideration the campus' relationship and compatibility with surrounding land uses. A single zoning district, the CBU Specific Plan Zone, is established to regulate the land use plan and will include two subareas (CBU SP-1 and CBU SP-2) to regulate uses permitted by right, by Minor Conditional Use Permit (MCUP), by Conditional Use Permit (CUP), or uses not permitted within a specific subarea. While some uses would be permitted in one subarea, they would be conditionally permitted or, for select uses such as parking structures or outdoor athletic facilities, not permitted in the other subarea (refer to Table 2.C in this EIR and Table 4-1 in the CBUSP Amendment). Additionally, both CBU SP-1 and CBU SP-2 have distinct building density and setbacks standards, as set forth in Chapter 4 (*Land Use Regulations and Development Standards*) of the CBUSP Amendment.

CBUSP Amendment Development Standards

Chapter 4 (*Land Use Regulations and Development Standards*) of the proposed CBUSP Amendment provides land use regulations and development standards[3] intended to support the CBUSP Amendment's objectives and policies as they relate to nose-sensitive receptors and to:

- Provide design parameters for all development in the CBU Specific Plan Zone;
- Provide guidance as to the quality and character of individual projects;

[2] *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. Pages 1, 27, and 29. City of Riverside. Adopted March 26, 2013.

[3] *California Baptist University Specific Plan Public Review Draft.* Chapter 4 Section A. City of Riverside. August 2018.

- Provide transitions between the CBU properties and surrounding non-CBU land uses; and
- Ensure appropriate sensitivity to adjacent single-family residential neighborhoods.

Table 2.C of this Draft EIR (Table 4-1 in the CBUSP Amendment) identifies the permitted and supportive uses allowed within the CBU Specific Plan Zone. These uses and all similar uses that are directly related to the operations of the University are permitted as a matter of right unless otherwise indicated in Table 2.C, subject to compliance with the development standards and design guidelines contained within the proposed CBUSP Amendment. Specifically, mechanical equipment may be located within the required side and rear setback areas, provided such equipment is acoustically shielded to achieve compliance with Title 7 (Noise Control) of the RMC and is adequately screened from public view.

CBUSP Amendment Design Guidelines

Chapter 5 (*Design Guidelines*) of the CBUSP Amendment provides specific design guidelines to guide the architectural, landscape, site furnishing, streetscape, entrance and corner, fence and wall, open space, lighting, signage, and campus art design to ensure a cohesive, aesthetically pleasing, and safe campus in accordance with the CBUSP Amendment objectives and policies.[4] These design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan.*

Architectural design shall apply to all new construction within the CBU Specific Plan Zone, including modifications to existing structures. New construction and modifications to existing structures will consider the relationship and compatibility of a proposed project with their surroundings through an assessment of the existing site and neighborhood and historic context. Considerations would include, for example, location of entrances/exits, providing solid walls along the sides of the structure that face non-CBU properties, and use of surfacing materials that minimize tire noise. Prior to the schematic design of any project, a site analysis would be conducted to form the design parameters for consideration of interface with adjoining noise-sensitive uses.

4.12.5 Environmental Impacts Before Mitigation

Threshold A: Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

[4] *Ibid.*

The City sets forth normally acceptable noise level standards for land use compatibility and interior noise exposure of new development. The City does not have specific noise level standards for multi-family residential land uses; therefore this analysis evaluates potential residential land uses under the CBUSP with the City's single-family residential noise level standards.

As outlined in the City's *General Plan 2025* and the RMC, exterior noise levels should not exceed 45 dBA during 10:00 p.m. to 7:00 a.m. and 55 dBA during 7:00 a.m. to 10:00 p.m. for residential uses. Other land uses (i.e., office/commercial, industrial, community support, public recreation facilities, and nonurban) should not exceed 70 dBA during any time of the day. The proposed project would result in noise from construction activities, mobile, stationary, long-term, and short-term sources.

Short-Term Impacts. Construction associated with implementation of the CBUSP would occur over a period of approximately 8 years. Construction activities associated with implementation of the CBUSP Amendment could result in substantial temporary or periodic increases in ambient noise levels at development sites throughout the CBU Specific Plan Zone. Construction noise would be short-term, generally intermittent, and would cease once the construction phase has been completed.

Two types of short-term noise impacts would occur during project construction: (1) equipment delivery and construction worker commutes and (2) project construction operations.

The first type of short-term construction noise would result from construction worker commutes and transport of construction equipment and materials to a project site within the CBU Specific Plan Zone. These transportation activities would incrementally raise noise levels on access roads leading to the site. Larger trucks used in equipment delivery are expected to generate higher noise impacts than trucks associated with worker commutes. The single-event noise from equipment trucks passing at a distance of 50 feet from a sensitive noise receptor would reach a maximum level of 84 dBA L_{max} (Table 4.12.G).

Table 4.12.G
Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor[1]	Predicted L_{max} at 50 feet (dBA, slow)[2]	Actual Measured L_{max} at 50 feet (dBA, slow)[3]
All Other Equipment > 5 HP	50	85	N/A[4]
Auger Drill Rig	20	85	84
Backhoe	40	80	78
Bar Bender	20	80	N/A

Table 4.12.G
Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor[1]	Predicted L_{max} at 50 feet (dBA, slow)[2]	Actual Measured L_{max} at 50 feet (dBA, slow)[3]
Blasting	N/A	94	N/A
Boring Jack Power Unit	50	80	83
Chain Saw	20	85	84
Clam Shovel (dropping)	20	93	87
Compactor (ground)	20	80	83
Compressor (air)	40	80	78
Concrete Batch Plant	15	83	N/A
Concrete Mixer Truck	40	85	79
Concrete Pump Truck	20	82	81
Concrete Saw	20	90	90
Crane	16	85	81
Dozer	40	85	82
Drill Rig Truck	20	84	79
Drum Mixer	50	80	80
Dump Truck	40	84	76
Excavator	40	85	81
Flat Bed Truck	40	84	74
Front-End Loader	40	80	79
Generator	50	82	81
Generator (< 25 kVA, VMS Signs)	50	70	73
Gradall	40	85	83
Grader	40	85	N/A
Grapple (on backhoe)	40	85	87
Horizontal Boring Hydraulic Jack	25	80	82
Hydra Break Ram	10	90	N/A
Impact Pile Driver	20	95	101
Jackhammer	20	85	89
Man Lift	20	85	75
Mounted Impact Hammer (hoe ram)	20	90	90
Pavement Scarifier	20	85	90

Table 4.12.G
Noise Emission Reference Levels and Usage Factors

Equipment Description	Acoustical Usage Factor[1]	Predicted L_{max} at 50 feet (dBA, slow)[2]	Actual Measured L_{max} at 50 feet (dBA, slow)[3]
Paver	50	85	77
Pickup Truck	40	55	75
Pneumatic Tools	50	85	85
Pumps	50	77	81
Refrigerator Unit	100	82	73
Rivet Buster/Chipping Gun	20	85	79
Rock Drill	20	85	81
Roller	20	85	80
Sand Blasting (single nozzle)	20	85	96
Scraper	40	85	84
Sheers (on backhoe)	40	85	96
Slurry Plant	100	78	78
Slurry Trench Machine	50	82	80
Soil Mix Drill Rig	50	80	N/A
Tractor	40	84	N/A
Vacuum Excavator (Vac-Truck)	40	85	85
Vacuum Street Sweeper	10	80	82
Ventilation Fan	100	85	79
Vibrating Hopper	50	85	87
Vibratory Concrete Mixer	20	80	80
Vibratory Pile Driver	20	95	101
Warning Horn	5	85	83
Welder/Torch	40	73	74

Source: Table K – Noise and Vibration Impact Analysis, LSA, December 2017.

Note: Noise levels reported in this table are rounded to the nearest whole number.

[1] Usage factor is the percentage of time during a construction noise operation that a piece of construction equipment is operating at full power.

[2] Maximum noise levels were developed based on Specification (Spec.) 721.560 from the Central Artery/Tunnel (CA/T) program to be consistent with the City of Boston's Noise Code for the "Big Dig" project.

[3] The maximum noise level was developed based on the average noise level measured for each piece of equipment during the CA/T program in Boston, Massachusetts.

[4] Since the maximum noise level based on the average noise level measured for this piece of equipment was not available, the maximum noise level developed based on Spec 721.560 would be used.

dBA = A-weighted decibels
HP = horsepower
L_{max} = maximum instantaneous noise level
kVA = kilovolt-amperes
N/A = not applicable
RCNM = Roadway Construction Noise Model
VMS = variable message sign

The second type of short-term noise impact is related to noise generated during excavation, grading, and building erection on a project site within the CBU Specific Plan Zone. No pile driving is proposed as part of the construction of the Project. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase. Table 4.12.G lists typical construction equipment noise levels recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor.

The site preparation phase, which includes excavation and grading of the site, tends to generate the highest noise levels because earthmoving equipment is the noisiest construction equipment. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

In addition to the referenced maximum noise level, the usage factor provided in Table 4.12.G is utilized to calculate the hourly noise level impact for each piece of equipment. Each piece of construction equipment operates as an individual point source. A composite noise level can be calculated when multiple sources of noise operate simultaneously. The composite noise level of the two loudest pieces of equipment, the bulldozer and scraper, during the earthmoving phase of construction would be 86 dBA Leq at a distance of 50 feet from the construction area. Once composite noise levels are calculated, reference noise levels can then be adjusted for distance. In general, this doubling the distance from the noise source would decrease noise levels by 6 dBA.

The nearest sensitive receptors to the CBU Specific Plan Zone are existing on-campus student housing and academic facilities, as well as existing educational facilities (Chemawa Middle School located at 8830 Magnolia Avenue and Sherman Indian High School located at 9010 Magnolia Avenue), and existing single-family and multi-family residences are located adjacent to the CBU Specific Plan Zone, some of which are between 10 and 25 feet from certain CBU properties (e.g. River Springs Charter School located at 8775 Magnolia Avenue and Engineering Building located at 3739 Adams Street, respectively).

At 10 feet, there would be an increase of approximately 14 dBA from the reduced distance compared to the noise level measured at 50 feet from the active construction area. Therefore, the closest sensitive receptors may be subject to short-term construction noise reaching 100 dBA L_{max} when construction would occur at a project site within the CBU Specific Plan Zone. Construction noise is exempt from noise standards by the City when activities occur between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays. Construction activity is not allowed on Sundays or federal holidays. Pursuant to RMC Section 7.35.020.G, all construction activities shall be restricted to between the hours of 7:00 a.m. and

7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays; no construction activities shall occur on Sundays or federal holidays.

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

Long-Term Impacts.

Long-Term Traffic Noise. Onsite traffic noise impacts within the CBU Specific Plan Zone were modeled utilizing information from the Traffic Impact Analysis (Appendix F) and information from the FHWA modeling to predict traffic noise level conditions with and without the proposed project. Table 4.12.H summarizes the FHWA modeling traffic conditions and includes projected traffic noise levels as measured at 50 feet from the centerline of the outermost traveled lane along the modeled roadway segments. The model does not account for existing sound walls or terrain features that would reduce traffic noise levels at adjacent land uses, but it assumes a worst-case direct-line-of-sight over hard surface to the modeled traffic noise sources.

The largest increase in traffic-related noise as a result of the project would be within subarea CBU SP-1 of the CBU Specific Plan Zone on Lancer Lane between Campus Bridge Drive and Adams Street. This increase in traffic would occur due to the main access point to the campus being shifted from Magnolia Street/Campus Bridge Drive to Adams Street and Lancer Lane/Briarwood Drive (the existing access at Magnolia Street/Campus Bridge Drive will remain). Lancer Lane could result in an up to a 7.2 dBA increase over existing conditions. This noise level would exceed the 3 dBA increase considered to be perceptible by the human ear in an outdoor environment. However, the resulting noise level along Lancer Lane/Briarwood Drive would be approximately 56.2 dBA CNEL, which would be lower than existing noise associated with other surrounding roadways and would be within the normally acceptable range (up to 60 dBA CNEL) for residential and school land uses. The next largest traffic-noise level increase associated with implementation of the CBUSP Amendment would be on Campus Bridge Drive between Magnolia Avenue and Lancer Lane, with an approximately 2 dBA increase over existing conditions. This noise level increase is less than the 3 dBA increase considered to be perceptible by the human ear in an outdoor environment and the resulting noise level would be

THIS PAGE INTENTIONALLY LEFT BLANK

Table 4.12.H
Existing Traffic Noise Levels Without and With Project

Roadway Segment	Existing Traffic Volumes (Dec 2016)					Existing + Ambient Traffic Volumes (2025)					General Plan Buildout (2025)				
	Without Project		With Project			Without Project		With Project			Without Project		With Project		
	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	Increase from Baseline Conditions	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	Increase from Baseline Conditions	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	Increase from Baseline Conditions
Magnolia Avenue - Jackson St to Overland St	25,078	68.1	26,806	68.4	0.3	27,335	68.5	28,112	68.6	0.1	46,066	70.7	46,387	70.8	0.1
Magnolia Avenue - Overland St to Monroe St	24,128	67.9	25,856	68.2	0.3	26,300	68.3	27,077	68.4	0.1	43,995	70.5	44,318	70.6	0.1
Magnolia Avenue - Monroe St to Campus Bridge Dr	24,089	67.9	27,545	68.5	0.6	26,257	68.3	27,812	68.6	0.3	43,569	70.5	43,926	70.5	0.0
Magnolia Avenue - Campus Bridge Dr to Adams St	27,104	68.4	28,832	68.7	0.3	29,543	68.8	30,320	68.9	0.1	41,954	70.3	42,548	70.4	0.1
Magnolia Avenue - Adams St to Jefferson St	27,045	68.4	28,773	68.7	0.3	29,479	68.8	30,256	68.9	0.1	38,556	70.0	39,820	70.1	0.1
Monroe Street - Garfield to Magnolia Ave	10,129	65.7	10,993	66.0	0.3	11,041	66.0	11,430	66.2	0.2	10,129	65.7	10,129	65.7	0.0
Monroe Street - Magnolia Ave to Diana Ave	8,983	64.6	9,847	65.0	0.4	9,792	64.9	10,181	65.1	0.2	8,983	64.6	8,983	64.6	0.0
Monroe Street - Diana Ave to Indiana Ave	9,212	64.7	10,076	65.1	0.4	10,041	65.1	10,430	65.2	0.1	6,000	62.8	8,893	64.5	1.7
Adams Street - Garfield St to Magnolia Ave	20,172	67.2	21,900	67.5	0.3	21,988	67.5	22,765	67.7	0.2	34,813	69.5	34,893	69.5	0.0
Adams Street - Magnolia Ave to Briarwood Dr	28,449	68.7	30,177	68.9	0.2	31,009	69.0	31,786	69.1	0.1	31,574	69.1	31,264	69.1	0.0
Adams Street - Briarwood Dr to Diana Ave	27,957	68.6	38,325	69.9	1.3	30,473	68.9	35,139	69.6	0.7	39,027	70.0	39,984	70.1	0.1
Adams Street - Diana Ave to Freeway 91 Ramps	27,939	68.6	33,987	69.4	0.8	30,454	68.9	33,176	69.3	0.4	39,027	70.0	39,984	70.1	0.1
Adams Street - Freeway 91 Ramps to Indiana Ave	27,074	68.4	31,394	69.1	0.7	29,511	68.8	30,288	68.9	0.1	39,027	70.0	39,984	70.1	0.1

Table 4.12.H
Existing Traffic Noise Levels Without and With Project

	Existing Traffic Volumes (Dec 2016)					Existing + Ambient Traffic Volumes (2025)					General Plan Buildout (2025)				
	Without Project		With Project			Without Project		With Project			Without Project		With Project		
Roadway Segment	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	Increase from Baseline Conditions	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	Increase from Baseline Conditions	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	ADT	CNEL (dBA) 50 feet from Centerline of Outermost Lane	Increase from Baseline Conditions
Adams Street - Indiana Ave to Lincoln Ave	14,926	65.8	16,654	66.3	0.5	16,269	66.2	17,046	66.4	0.2	25,702	68.2	25,771	68.2	0.0
Diana Avenue - Monroe St to Campus View	2,689	59.9	0	25.6	-34.3	2,931	60.3	0	25.6	-34.7	0	25.6	0	25.6	0.0
Diana Avenue - Campus View to Adams St	3,522	61.1	0	25.6	-35.5	3,839	61.5	0	25.6	-35.9	0	25.6	0	25.6	0.0
Campus Bridge Drive - Magnolia Ave to Lancer Lane	8,688	55.2	13,872	57.2	2.0	9,470	55.6	5,184	53.0	-2.6	8,220	55.0	9,982	55.8	0.8
Campus View - Lancer Lane to Diana Ave	3,301	51.0	0	15.8	-35.2	3,598	51.4	0	15.8	-35.6	0	15.8	0	15.8	0.0
Lancer Lane - Campus Bridge Dr to Adams St	2,830	49.0	14,926	56.2	7.2	3,090	49.4	15,186	56.3	6.9	5,116	51.6	6,475	52.6	1.0

Source: Table L – Noise and Vibration Impact Analysis, LSA, December 2017.
Note: Traffic noise within 50 feet of the roadway centerline should be evaluated with site-specific information.
ADT = average daily traffic
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibels

57.2 dBA CNEL, which also would be lower than existing noise associated with other surrounding roadways and would be within the normally acceptable range for residential and school land uses. Therefore, no significant traffic noise impacts would occur for off-site land uses, and no mitigation is required.

Interior Noise Analysis. Based on the EPA's Protective Noise Levels,[5] with a combination of walls, doors, and windows, standard construction materials (Sound Transmission Class [STC]-24 to STC-28) would provide more than 25 dBA in exterior-to-interior noise reduction with windows closed and 15 dBA or more with windows open. As detailed in Table 4.12.D, the modeled traffic noise level along the CBU campus boundary measured 50 feet from the centerline of the outermost lane, reaches approximately 68.7 dBA CNEL along Adams Street. Therefore, with windows open (i.e., 68.7 dBA – 15 dBA = 53.7 dBA), units would not meet the City's normally acceptable school interior noise standard of 45 dBA CNEL during the daytime (7:00 a.m. to 10:00 p.m.) and 35 dBA CNEL during the nighttime (10:00 p.m. to 7:00 a.m.). Table 4.12.I below evaluates residential and school land uses based on the City's interior noise level standards.

Table 4.12.I
Interior Noise Levels

Land Use	Existing On-site Exterior Ambient Noise Level	Interior Noise Level[1]		Interior Noise Standard		Meet Standard?
School	68.7 dBA CNEL	Windows Open	53.7 dBA CNEL	45 dBA		No
		Windows Closed	43.7 dBA CNEL	45 dBA		Yes
Residential	68.7 dBA CNEL	Windows Open	53.7 dBA CNEL	Daytime[2]	45 dBA	No
				Nighttime[3]	35 dBA	No
		Windows Closed	43.7 dBA CNEL	Daytime[2]	45 dBA	Yes
				Nighttime [3]	35 dBA	Yes

Source: Table M – Noise and Vibration Impact Analysis, LSA, December 2017.
Notes:
[1] Windows Based on the EPA's Protective Noise Levels, with a combination of walls, doors, and windows, standard construction materials (Sound Transmission Class [STC]-24 to STC-28) would provide more than 25 dBA in exterior-to-interior noise reduction with windows closed and 15 dBA or more with windows open.
[2] Daytime hours are defined as 7:00 a.m. to 10:00 p.m.
[3] Nighttime hours are defined as 10:00 p.m. to 7:00 a.m.
Source: Compiled by LSA, 2017.

[5] Environmental Protection Agency, 1978. *Protective Noise Levels, Condensed Version of EPA Levels Document.* November.

The normally acceptable interior noise level for residential uses is 45 dBA CNEL during the daytime (7:00 a.m. to 10:00 p.m.) and 35 dBA CNEL during the nighttime (10:00 p.m. to 7:00 a.m.). A heating, ventilation, and air-conditioning (HVAC) system would allow for windows to be closed in order to reduce noise levels for students and faculty to meet the City's normally acceptable interior noise level criterion of 45 dBA CNEL (i.e., 68.7 – 25 dBA = 43.7 dBA). Implementation of **MM-NOI-2** would require a project-specific acoustical study to determine specific insulation and other structural requirements such as an HVAC system to allow all windows to remain closed in order to reduce interior noise levels by 25 dBA, resulting in interior noise levels of 43.7 dBA CNEL. Therefore, impacts related to interior noise levels during the daytime (7:00 a.m. to 10:00 p.m.) would be less than significant with mitigation incorporated.

As identified above, with incorporation of HVAC systems, interior noise levels would be reduced to 43.7 dBA CNEL, which would still exceed the City's nighttime interior noise level for residential uses. Therefore, to meet the interior nighttime noise level, any residential uses developed under the CBUSP Amendment within areas of the CBU Specific Plan Zone with noise levels greater than 60 dBA CNEL shall include a project-specific acoustical study to determine specific insulation and other structural requirements, in accordance with **MM-NOI-2.** Implementation of **MM-NOI-2** would require new residential land uses to 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 would be designed to maintain a standard of 45 dBA CNEL or less in building interiors.

Exterior Noise Analysis. Development allowed under the proposed CBUSP Amendment may include the development of new sensitive land uses, such as residential and school land uses, in the vicinity of existing noise sources. However, specific land uses and placement is unknown at this time. Table 4.12.J below evaluates potential land uses that could be implemented under the proposed CBUSP Amendment based on the City's exterior land use compatibility standards.

Table 4.12.J
Exterior Noise Levels

Land Use	Existing On-site Exterior Ambient Noise Level	Exterior Noise Standard		Meet Standard?
School	68.7 dBA CNEL	Normally Acceptable	Up to 60 dBA CNEL	No
		Conditionally Acceptable	60-70 dBA CNEL	Yes
		Normally Unacceptable	70-80 dBA CNEL	-
		Conditionally Unacceptable	Above 80 dBA CNEL	-
Residential	68.7 dBA CNEL	Normally Acceptable	Up to 60 dBA CNEL	No
		Conditionally Acceptable	60-65 dBA CNEL	No
		Normally Unacceptable	65-70 dBA CNEL	Yes
		Conditionally Unacceptable	Above 70 dBA CNEL	-

Table 4.12.J
Exterior Noise Levels

Land Use	Existing On-site Exterior Ambient Noise Level	Exterior Noise Standard		Meet Standard?
Amphitheater/ Performing Arts Center	68.7 dBA CNEL	Normally Acceptable	-	-
		Conditionally Acceptable	Up to 65 dBA CNEL	No
		Normally Unacceptable	-	-
		Conditionally Unacceptable	Above 65 dBA CNEL	Yes
Athletic Field	68.7 dBA CNEL	Normally Acceptable	-	-
		Conditionally Acceptable	Up to 70 dBA CNEL	Yes
		Normally Unacceptable	-	-
		Conditionally Unacceptable	Above 70 dBA CNEL	-
Office	68.7 dBA CNEL	Normally Acceptable	Up to 65 dBA CNEL	No
		Conditionally Acceptable	65-75 dBA CNEL	Yes
		Normally Unacceptable	Above 75 dBA CNEL	-
		Conditionally Unacceptable	-	-

Source: Table N – Noise and Vibration Impact Analysis, LSA, December 2017.

The normally acceptable exterior noise level for single-family residential uses is up to 60 dBA CNEL, and noise levels of 60 to 65 dBA CNEL are conditionally acceptable when noise insulation features are included in the design to meet the interior noise standard. The normally acceptable exterior noise level for school uses is up to 60 dBA CNEL, and noise levels noise levels of 60 to 70 dBA CNEL are considered conditionally acceptable when noise insulation features are included in the design to meet the interior noise standard. As discussed above, noise levels within the CBU Specific Plan Zone are expected to reach approximately 68.7 dBA CNEL (see previously-referenced Table 4.12.D).

The 68.7 dBA CNEL would be within the City's conditionally acceptable noise level of 60 to 70 dBA CNEL for school uses when noise reduction requirements and noise insulation features are included in the design to meet the interior noise standard. However, this noise level would exceed the City's conditionally acceptable noise level of 60 to 65 dBA CNEL for single-family residential land uses. In addition, this noise level would be considered conditionally unacceptable for amphitheater land uses, within the City's conditionally acceptable noise level of 70 dBA CNEL for athletic field land uses, and within the City's conditionally acceptable noise level of 65 to 75 dBA CNEL for office land uses. Therefore, implementation of **MM-NOI-2** would be required to ensure that projects developed under the proposed CBUSP Amendment would meet the City's land use compatibility standards detailed in Table 4.12.J.

Long-Term Stationary Noise Impacts. Stationary source noise on campus is primarily associated with heating and ventilation equipment, parking lot activities, and athletic and performance art/amphitheater events.

Parking lot noise, including engine sounds, car doors slamming, car alarms, loud music, and people conversing, would occur within the CBU Specific Plan Zone and on nearby streets. Typical parking lot activities, such as people conversing or doors slamming, generates approximately 60 dBA to 70 dBA L_{max} at 50 feet.

The nearest sensitive receptors to the CBU Specific Plan Zone are existing on-campus student housing and academic facilities, as well as existing educational facilities (Chemawa Middle School located at 8830 Magnolia Avenue and Sherman Indian High School located at 9010 Magnolia Avenue) and single-family and multi-family residences located adjacent to the properties within the CBU Specific Plan Zone, some of which are between 10 and 25 feet from certain CBU properties. Current project plans do not have sufficient detail to identify locations of future parking lots; therefore, this analysis assumes a worst-case scenario of parking lots located nearest to the existing sensitive receptors. As detailed in Table 4.12.K, adjusted for distance, the nearest sensitive receptors located approximately 10 feet from parking lots would be exposed to a noise level of 74 to 84 dBA L_{max} generated by parking lot activities.

Table 4.12.K
Stationary Source Noise Levels

Stationary Source	Existing On-site Exterior Ambient Noise Level	Closest Sensitive Receptor	Change in Noise Level[1]	Resulting Noise Level	Standard		Meet Standard?
Parking Lot Activity	60-70 dBA L_{max} at 50 feet	10 feet	14	74 to 84 dBA L_{max}	Daytime[2]	55 dBA	No
					Nighttime[3]	45 dBA	No
HVAC Equipment	75 dBA L_{max} at 3 feet	10 feet	-10	65 dBA L_{max}	Daytime[2]	55 dBA	No
					Nighttime[3]	45 dBA	No

Source: Table O – Noise and Vibration Impact Analysis, LSA, December 2017.
Notes:
[1] Sound levels decrease or increase at a rate of approximately 6 dB for each doubling of distance from the source.
[2] Daytime hours are defined as 7:00 a.m. to 10:00 p.m.
[3] Nighttime hours are defined as 10:00 p.m. to 7:00 a.m.
Source: Compiled by LSA, 2017.

Since parking lot activity would occur intermittently throughout the day and each time would last less than one minute, noise associated with these parking lot activities when averaged over a 24-hour period and weighted for evening and nighttime quieter ambient noise levels is not expected to cause an increase in noise levels of more than 3 dBA and therefore would not contribute significantly to the CNEL level in the project vicinity. However, since specific land uses and placement is unknown at this time, **MM-NOI-3** shall be implemented to ensure implementation of the CBUSP Amendment would not expose persons to noise levels in excess of the City's

General Plan or Municipal Code. With incorporation of **MM-NOI-3**, implementation of the CBUSP Amendment is not expected to substantially increase parking lot noise over existing noise levels.

HVAC equipment is a typical noise source associated with commercial uses. HVAC equipment is often mounted on rooftops, located on the ground, or located within mechanical rooms. The noise sources could take the form of fans, pumps, air compressors, chillers, or cooling towers. HVAC operations would be required to meet all noise standards.

Precise details of HVAC equipment, including future location and sizing, are unknown at this time; therefore, for purposes of this analysis, 75 dBA at 3 feet was assumed to represent HVAC-related noise.[6] As detailed in Table 4.12.K, at 10 feet from a point source, the closest off-site noise-sensitive receptors would be exposed to a noise level of 65 dBA L_{max} generated by HVAC equipment. It is assumed that, as a worst-case scenario, HVAC equipment would operate continuously through the day, evening, and night. Therefore, this noise level of 65 dBA L_{max} would exceed the City's exterior noise standards of 55 dBA during the daytime (7:00 a.m. to 10:00 p.m.) and 45 dBA during the nighttime (10:00 p.m. to 7:00 a.m.) at residential land uses. This would also exceed the RMC standard, which specifies that HVAC systems shall not exceed 55 dBA at the property line. Therefore, in order to reduce noise levels associated with HVAC equipment, **MM-NOI-4** would require design considerations and shielding to be implemented to ensure that the 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.

Implementation of the CBUSP Amendment may include athletic fields or performance art/amphitheater facilities, which could result in increased noise levels associated with amplified sound such as people cheering, musical instruments, and public address systems. The degree to which noise levels associated with athletic fields or performance art/amphitheater facilities would attenuate at the nearest noise sensitive receptors would depend on the distance between the point source(s) and receptors, intervening structures, the direction in which amplifiers face, and wind speed and direction. Since specific land uses and placement is unknown at this time; **MM-NOI-4** shall be implemented to ensure implementation of the CBUSP Amendment would not expose persons to noise levels in excess of the City's General Plan or Municipal Code.

The CBUSP Amendment outlines design elements that guide subsequent development to be sensitive to noise-sensitive receptors. These self-mitigating project design features, as outlined in Section 4.12.4 above, include specific requirements, such as design parameters for all development in the CBU Specific Plan Zone, guidance as to the quality and character of

[6] Trane, 2002. Sound Data and Application Guide for the New and Quieter Air-Cooled Series R Chiller.

individual projects, consideration of transitions between the CBU properties and surrounding non-CBU land uses, and appropriate sensitivity to adjacent single-family residential neighborhoods, to be met for all subsequent development projects within the CBU Specific Plan Zone. In conjunction with these project design features, mitigation measures **MM-NOI-1** through **MM-NOI-4** are proposed to minimize disturbances to nearby sensitive receptors during construction and implementation/operation of the proposed Project. With implementation of the CBUSP Amendment project design features in conjunction with **MM-NOI-1** through **MM-NOI-4**, the proposed Project would reduce impacts related to exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance to **less than significant with mitigation incorporated**.

Threshold B: Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Construction-related Vibration Impact. Based on the *Transit Noise and Vibration Impact Assessment* (FTA 2006), a minimum of 90 VdB (or 0.12 in/sec PPV) is required to cause any potential building damage. FTA guidelines show that a vibration level of up to 102 VdB (equivalent to 0.5 in/sec PPV) is considered safe for buildings consisting of reinforced concrete, steel, or timber (no plaster), and would not result in any construction vibration damage. In extreme cases, excessive ground-borne vibration has the potential to cause structural damage to buildings. For buildings built prior to the 1950s or that are particularly fragile structures, the damage threshold is approximately 96 VdB.[7]

As detailed in Table 4.12.L, Ground-borne vibration levels from construction activities very rarely reach levels that can damage structures, but these levels are perceptible near active construction sites. With the exception of old buildings built prior to the 1950s, structural damage from heavy construction activities rarely occurs.

Table 4.12.L
Typical Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 feet (in/sec)	Approximate VdB at 25 feet
Pile Driver	Upper range	1.518	112
(impact)	Typical	0.644	104
Pile Driver	Upper range	0.734	105
(sonic)	Typical	0.170	93
Clam shovel drop (slurry wall)		0.202	94
Hydromill	In soil	0.008	66

[7] Harris, C.M., 1998. *Handbook of Acoustical Measurements and Noise Control.*

Table 4.12.L
Typical Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 feet (in/sec)	Approximate VdB at 25 feet
(slurry wall)	In rock	0.017	75
Vibratory roller		0.210	94
Hoe ram		0.089	87
Large bulldozer		0.089	87
Caisson drilling		0.089	87
Loaded trucks		0.076	86
Jackhammer		0.035	79
Small bulldozer		0.003	58

Source: Table D – Noise and Vibration Impact Analysis, LSA, December 2017.
Notes: PPV= peak particle velocity; in/sec= inches per second

The closest existing structures are on-campus student housing and academic facilities, as well as existing educational facilities (Chemawa Middle School located at 8830 Magnolia Avenue and Sherman Indian High School located at 9010 Magnolia Avenue) and single-family and multi-family residences, some of which are between 10 and 25 feet from certain CBU properties (i.e., River Springs Charter School located at 8775 Magnolia Avenue and Engineering Building located at located at 3739 Adams Street, respectively). Additionally, the CBU Specific Plan Zone contains several historic structures built prior to the 1950s, and since specific land uses and placement is unknown at this time, **MM-NOI-5** shall be required to ensure construction activities associated with development allowed under the CBUSP Amendment would not expose persons or structures to excessive ground-borne vibration.

When roadways are smooth, vibration from traffic (even heavy trucks) is rarely perceptible. The streets surrounding the project area are paved, smooth, and unlikely to cause significant ground-borne vibration. In addition, the rubber tires and suspension systems of buses and other on-road vehicles make it unusual for on-road vehicles to cause ground-borne noise or vibration problems. It is assumed that no such vehicular vibration impacts would occur, and no vibration impact analysis of on-road vehicles is necessary.

With implementation of the CBUSP Amendment project design features outlined in Section 4.12.4 above, in conjunction with **MM-NOI-5**, the proposed Project would reduce impacts related to groundborne vibration or groundborne noise levels to **less than significant with mitigation incorporated**.

Threshold C: A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant with mitigation incorporated. Please refer to the discussion under Threshold A above.

Threshold D: A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant with mitigation incorporated. Please refer to the discussion under Threshold A above.

Threshold E: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Airport related noise levels are primarily associated with aircraft engine noise made while aircraft are taking off, landing, or running their engines while still on the ground. The closest airport to the CBU campus is Riverside Municipal Airport located approximately 1.3 miles north of the CBU Specific Plan Zone. Although aircraft noise is occasionally audible within the CBU Specific Plan Zone, no portion of the CBU Specific Plan Zone lies within the 55 dBA CNEL noise contours of the Riverside Municipal Airport. Impacts would be **less than significant**. No mitigation is required.

Threshold F: For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The CBU Specific Plan Zone is not in the vicinity of any known private airstrip, so implementation of the CBUSP Amendment would not expose people residing or working in the project area to excessive noise levels generated by a private airstrip. No impact would occur, and no mitigation is required.

4.12.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant impacts. The following mitigation measures have been evaluated for feasibility and are incorporated in order to reduce potentially significant impacts related to construction and operational noise to less than significant levels.

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

- Equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards.

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

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

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

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

MM-NOI-4: Prior to issuance of occupancy permits, design considerations and shielding must be implemented to ensure that all HVAC equipment is located, enclosed, shielded, or otherwise designed to reduce HVAC-related noise sources at the nearest

sensitive receptors to 55 dBA at the property line. This measure shall be implemented to the satisfaction of the City Planning Division.

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

4.12.7 Environmental Impacts After Mitigation Is Incorporated

Implementation of the CBUSP, RMC, and the mitigation measures presented in Section 4.12.6 of this Draft EIR will reduce the significance of project noise related impacts to a level of less than significant. These items include: the CBUSP objectives and policies (Chapter 2), CBUSP development plan (Chapter 3), CBUSP development standards (Chapter 4), and CBUSP design guidelines (Chapter 5); the RMC that limits hours construction to between 7:00 a.m. and 7:00 p.m. on weekdays and 8:00 a.m. and 5:00 p.m. on Saturdays, and no construction activities on Sundays or federal holidays. Implementation of the CBUSP Amendment and RMC in conjunction with incorporation of mitigation measures **MM-NOI-1** through **MM-NOI-5** presented in Section 4.12.6 of this Draft EIR, would reduce impacts from construction and operational noise sources to sensitive receptors as a result of implementation of the CBUSP Amendment to less than significant levels. No significant impacts would remain after mitigation.

4.12.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

City of Riverside. *California Baptist University Specific Plan*. Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside. *California Baptist University Specific Plan Amendment, Public Review Draft*. August 2018.

City of Riverside. *City of Riverside General Plan 2025*. November 2007.

City of Riverside, *City of Riverside General Plan 2025 and Supporting Documents Final Program Environmental Impact Report*. December 2007.

City of Riverside Municipal Code. *Title 7 - Noise Control*.

City of Riverside Municipal Code. *Title 19 - Zoning*.

Environmental Protection Agency. *Protective Noise Levels, Condensed Version of EPA Levels Document*. November 1978.

Harris, C.M. *Handbook of Acoustical Measurements and Noise Control.* 1998.

LSA Associates, Inc. *Noise and Vibration Impact Analysis, California Baptist University*. December 2017.

Rick Engineering. *California Baptist University Traffic Impact Analysis*. December 2016.

Trane. *Sound Data and Application Guide for the New and Quieter Air-Cooled Series R Chiller*. 2002.

THIS PAGE INTENTIONALLY LEFT BLANK

4.13 POPULATION AND HOUSING

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential to induce substantial population growth or to displace housing or people. The analysis is based in part on population and housing projections identified by the California Department of Finance (DOF), the Southern California Association of Governments (SCAG), and information contained in the City's *General Plan 2025*. No comments regarding population and housing were received in response to the NOP.

4.13.1 Setting

Population. As reported by the DOF, 326,792[1] persons resided in the City (January 1, 2017.) This represents a one percent increase from the City's January 1, 2016 population. As detailed in Table 4.13.A, SCAG projects the populations of the City, Riverside County, and SCAG region to continue to grow. By 2040, SCAG projects the City's population will grow to 386,600 residents.

Housing. The number of housing units in the City has increased to accommodate the City's growing population. SCAG projects the City's number of households will grow to 118,600 by the year 2040 (Table 4.13.A).

Employment. Employment within the City has increased to accommodate the growing population. SCAG projects the City's number of employment will grow to 200,500 by the year 2040 (Table 4.13.A).

Table 4.13.A
SCAG Demographic Forecasts

	2012	2040	Total Growth	Increase (%)
Population				
City of Riverside	310,700	386,600	75,830	24.4
Riverside County	2,245,000	3,055,000	810,000	3.60
SCAG*	18,300,000	22,100,000	3,800,000	20.7
Households				
City of Riverside	92,400	118,600	26,200	28.4
Riverside County	694,000	1,055,000	361,000	52.0

[1] E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2016 and 2017. Sacramento, California, May 2017. http://dof.ca.gov/Forecasting/Demographics/Estimates/E-1/. (Accessed December 12, 2017.

Table 4.13.A
SCAG Demographic Forecasts

	2012	2040	Total Growth	Increase (%)
SCAG*	5,900,000	7,400,000	1,500,000	25.4
Employment				
City of Riverside	120,000	200,500	85,000	70.8
Riverside County	617,000	1,175,000	558,000	90.4
SCAG*	7,400,000	9,900,000	2,500,000	33.7

Source: 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast Appendix, Table 11, Southern California Association of Governments, April 2016.

Jobs/Housing Ratio. The ratio of jobs to housing units in the City is used by regional planning groups to balance regional traffic commutes to minimize freeway congestion, air pollutant emissions, and greenhouse gas emissions. The jobs-to-housing ratio measures the extent to which job opportunities in a given geographic area are sufficient to meet the employment needs of area residents. This ratio identifies the number of jobs available in a given region compared to the number of housing units in the same region. For example, a region with a jobs-to-housing factor of 1.5 would indicate that 1.5 jobs exist for every housing unit within that region. The standard used for comparison is the jobs-to-housing ratio of the SCAG region, which is currently 1.30 (2012) jobs for every household. This standard is used because most residents of the region are employed somewhere within the SCAG region. A City or subregion with a jobs-to-housing ratio lower than the overall standard of 1.30 jobs for every household would be considered a "jobs poor" area, indicating that many of the residents must commute to places of employment outside the subregion. Table 4.13.B identifies the current and future potential jobs/housing ratios for the City, County, and the SCAG region.

Table 4.13.B
Jobs/Housing Ratios

	2012	2040
City of Riverside	1.3	1.7
County of Riverside	0.9	1.1
SCAG	1.3	1.3

Source: Table 4.13.A (SCAG 2016 RTP regional projections).

The City's 2012 jobs/housing ratio is 1.3, which is higher than Riverside County and equal to SCAG's regional job/housing ratio. Based on this ratio, there are more jobs than homes in the City. Furthermore, the City's projected 2040 jobs/housing ratio is greater than that of either Riverside County or the SCAG region.

4.13.2 Related Regulations

Federal Regulations

There are no federal policies or regulations applicable to the discussion of Housing and Population for the proposed Project.

State Regulations

Regional Housing Needs Assessment (RHNA). The Regional Housing Needs Assessment (RHNA) is mandated by State Housing Law[2] as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. The RHNA for Riverside County is developed by SCAG and allocates to cities and the County (for unincorporated areas) their "fair share" of the region's projected housing needs. The 5th Cycle RHNA Allocation Plan, which covers the planning period from January 2014 to October 2021, was adopted by SCAG on October 4, 2012.

The projected housing needs in the RHNA are categorized by income levels (very low, low, moderate, and above moderate income) established by the U.S. Department of Housing and Urban Development (HUD). According to the Allocation Plan, the City must provide 8,283 units in various income categories, including 2,002 very low-income, 1,336 low-income, 1,503 moderate-income, and 3,442 above moderate-income housing units.[3]

Local Regulations

City of Riverside General Plan 2025. The Riverside General Plan 2025 Environmental Impact Report outlines several General Plan goals and policies pertaining to population and housing throughout the City.

The following policies pertaining to population/housing were identified from the City's General Plan 2025 and are applicable to the proposed Project. While listed below, the Project's consistency with General Plan policies is provided in Table 4.10.A (see Section 4.10, Land Use and Planning.)

---

2 Government Code §65584.

3 Southern California Association of Governments 5th Cycle Regional Housing Needs Assessment Final Allocation Plan, 1/1/2014–10/1/2021; http://rtpscs.scag.ca.gov/Documents/rhna/5thCyclePFinalRHNAplan.pdf, site accessed December 5, 2017.

Land Use and Urban Design Element

Objective LU-78: Maintain Ramona's established residential character while allowing for higher-intensity, transit-oriented residential and mixed residential-commercial development on opportunity sites, particularly along Magnolia and California Avenues.

Policy LU-78.1 Improve and expand the housing stock to support and complement the major educational institutions and bus rapid transit.

Housing Element

Objective H-2: To provide adequate diversity in housing types and affordability levels to accommodate housing needs of Riverside residents, encourage economic development and sustainability, and promote an inclusive community.

Policy H-2.4 Housing Diversity. Provide development standards and incentives to facilitate live-work housing, mixed-use projects, accessory dwellings, student housing, and other housing types.

4.13.3 Thresholds of Significance

The following thresholds of significance regarding potential impacts related to population and housing are based on the Appendix G of CEQA Guidelines. The project would have a significant impact relative to population or housing if it:

- (Threshold A) Induced substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure);
- (Threshold B) Displaced substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and/or
- (Threshold C) Displaced substantial numbers of people, necessitating the construction of replacement housing elsewhere.

Methodology

To determine the potential for impacts related to population and housing, the current uses, overall condition of the project site, historic and current population and housing characteristics, and future projections for population and housing were identified. This analysis is based on data published by the DOF and SCAG, as well as information presented in the City's General Plan.

4.13.4 Project Design Features

The proposed CBUSP Amendment includes Land Use Regulations and Development Standards the will govern how, when and where future development within the Project area will occur.

The proposed Project does not include any specific development proposal; therefore, a discussion of project-specific design features is not warranted at this time.

4.13.5 Environmental Impacts Before Mitigation

Threshold A: Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?

CEQA requires a discussion of ways in which the proposed project could be growth inducing (see also Section 8.0, *Growth Inducing Impacts*). A project could be viewed as growth inducing if directly or indirectly fosters economic or population growth, or the construction of additional housing.[4] Direct forms of growth include increased employment opportunities from new commercial or industrial uses and additional residents occupying new residential development. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area.

A project could indirectly induce growth by reducing or removing barriers to growth, or by creating a condition (e.g., increased demand for goods and services) that attracts additional population or new economic activity. Substantial growth impacts could also occur if a project provides infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies.

Growth can only happen through capital investment in new economic opportunities by the private or public sectors. Under CEQA, growth inducement is not considered necessarily detrimental, beneficial, or of little significance to the environment. Typically, the growth-inducing potential of a project would be considered significant if it fosters growth or a concentration of population in excess of what is assumed in pertinent master plans, land use plans, or in projections made by regional planning agencies (e.g., SCAG). In general, growth induced by a project is considered a significant impact if it can be demonstrated that the potential growth significantly affects the environment in some way.

[4] *CEQA Guidelines* §15126.2(d).

The SCAG 2016 Regional Transporation Plan/Susbtainable Communites Strategy (RTP/SCS) is based on growth projections for population, households, and employment prepared for regional, county, and local jurisdictional areas. The 2016 RTP/SCS forecasts represent the likely growth scenario for the Southern California region in the future, taking into account recent and past trends, reasonable key technical assumptions, and local or regional growth policies (see Table 4.13.A)

The University has experienced and is planning for a substantial increase in its enrollment. The University's student population consists of three student categories: traditional students, graduate students, and online students. Traditional students are full-time undergraduate students who either live on-campus or commute. Graduate students are those who possess undergraduate degrees and are pursuing advanced masters or doctorate degrees, and do not live on campus. Lastly, online students are those who participate in courses that are offered online and do not regularly attend classes on campus.

The proposed CBUSP Amendment encompasses the properties administered under the 2013 CBUSP and includes an amendment to the City's General Plan to change the land use designation from PF – Public Facilities/Institutional to CBUSP – California Baptist University Specific Plan at the following locations:

- CBU College of Health Sciences at 3532 Monroe Street (APN 233-120-010)
- Riverside Christian Elementary School at 3626 Monroe Street (APN 233-110-045)

Permitted uses with the Project area include academic (including student housing), administrative, athletic, office, services, and commercial uses designed to foster a positive relationship between CBU and the community. The Project proposes to add approximately 400,000 square feet of building space for administrative, academic, student housing, and recreational purposes.

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

The University anticipates an enrollment goal of 12,000 students (7,201 *traditional* students) in 2025. Based on a student to faculty/staff ratio of 11.11,[5] the projected enrollment would require an increase in faculty/staff positions from 757 positions in 2015 to 1,080 positions by 2025, a potential increase of up to 323 jobs in the City.

University policy dictates that every student enrolled or receiving a specified level of financial aid from the University must live on campus until reaching the age of 21. Of the projected 2025 enrollment of 12,000, 7,201 students are anticipated to be *traditional* students. The University's goal is to provide a bed-to-student ratio of 0.55 for *traditional* students. Based on this ratio, project future enrollment within this student category would require 3,961 beds. Currently, 2,861 beds are provided; therefore, an additional 1,110 beds are required to accommodate future increases in the number of *traditional* students. Current student housing options consist of studio apartments, one-bedroom apartments, two-bedroom apartments, and townhomes with an occupancy ranging from two to five students with an average occupancy of 3.375 students per housing unit. Although CBU calculates on campus housing demand based on beds as opposed to units, student enrollment increases that may result from implementation of proposed Project may require up to 326 additional student housing units by 2025.[6]

As detailed in Table 4.13.B, the 2012 jobs-to-housing ratios for the City, County, and SCAG region are 1.30, 0.89, and 1.25, respectively. This data suggests the City trends towards a slightly more "jobs rich" scenario compared to the County and the SCAG region. Based on population, employment and housing forecasts, this trend will continue through 2040. Implementation of the proposed project could add up to 323 jobs and 1,110 additional student beds to the City by 2025. The potential increase in staff/faculty positions and student housing would not affect the City's existing or forecast job/housing ratio.

The Project area is located within an area served by existing roadway and utility infrastructure; therefore, the Project does not include the extension of roadway or utility features that would contribute to new or unplanned growth. It is not certain if future enrollment will increase the population of the City. If students already live locally, they would be included in the existing SCAG growth forecasts. In the unlikely event all new students originate from outside the City,

---

5 *California Baptist University Specific Plan, Public Review Draft.* Chapter 2 Section E, Subsection 1 Table 2-2 City of Riverside. August 2018.

6 *California Baptist University Specific Plan, Public Review Draft*Chapter 2 Section E, Subsection 2. Table 2-3. City of Riverside. August 2018.

Based on an average of 3.375 students per student housing unit type within the CBU Specific Plan Zone. 1,100 additional beds projected from 2015 to 2025 ÷ 3.375 students per CBU housing unit = 326 additional student housing units.

the forecast enrollment could increase the City's population by 3,578 persons (a 1.0 percent over 2017 estimates) Any increase in population resulting from development pursuant to the CBUSP is consistent with existing and future population forecasts and would not significantly (either directly or indirectly) population growth in the City or region; therefore, the impacts will be **less than significant** both directly and indirectly. No mitigation is required.

Threshold B: Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

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

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

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

Threshold C: Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

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

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

4.13.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant adverse impacts. As no significant impact related to population and housing has been identified, no mitigation is warranted.

4.13.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates the Project will have less than significant impacts to population and housing. Therefore, no mitigation is required.

4.13.8 References

City of Riverside, *California Baptist University Specific Plan, Public Review Draft.* August 2018.

Department of Finance, E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2016 and 2017. Sacramento, California, May 2017, http://dof.ca.gov/Forecasting/Demographics/Estimates/E-1/, site accessed December 12, 2017.

Southern California Association of Governments. *5th Cycle Regional Housing Needs Assessment Final Allocation* Plan, 1/1/2014–10/1/2021. http://rtpscs.scag.ca.gov/Documents/rhna/5thCyclePFinalRHNAplan.pdf. (Accessed December 5, 2017).

Southern California Association of Governments. *The 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast Appendix.* April 2016.

THIS PAGE INTENTIONALLY LEFT BLANK

4.14 PUBLIC SERVICES

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, this section evaluates the proposed Project's potential impacts to public services including fire protection, police protection, schools, libraries, and other public facilities (e.g., community centers). Park services are addressed in Section 4.15, *Recreation*. No comments regarding public services were received in response to the NOP.

4.14.1 Setting

Fire Protection. The City of Riverside Fire Department (RFD) provides fire protection and emergency services to the City. RFD has five divisions: Administration, Prevention, Operations, Special Services, and Training. There are 14 fire stations strategically placed throughout the City. The Project site is located near Stations 2, 5, and 10. The "first in" station to serve the Project site would be Station 2. The closest fire stations to the Project site are provided in Table 4.14.A.

Table 4.14.A
Nearest Fire Station Locations

Fire Station	Station Name	Address	Distance from Project Site
Station 2	Arlington	9449 Andrew Street	1 mi southwest
Station 5	Airport	5883 Arlington Avenue	1 mi north
Station 10	Arlington Heights	2590 Jefferson Street	1.2 mi southeast

Source: City of Riverside Fire Department. Fire Stations. Website: https://www.riversideca.gov/fire/stations.asp. (Accessed August 21, 2017).

The RFD is organized into two types of fire stations: a Single-Company Station or a Multi-Company Station. The Arlington Heights Station is a Single-Company Station, which has only one unit. The Arlington and Airport Stations are Multi-Company Stations; these stations have more than one piece of apparatus and have more personnel than the Single-Company Stations. The Single-Company Stations respond alone from their stations on fires, hazardous material responses, etc.

RFD's Operations Division responded to 38,000 emergency calls in 2017.[1] The average on-site response to fire calls is 6 minutes 56 seconds.[2] Delivering and maintaining such a high level of service in the future as the City grows is a major concern to RFD. RFD's goal is to maintain a 5-

[1] Jennifer McDowell, Fire Marshall. Riverside Fire Prevention Bureau. Personal Communication with City of Riverside, January 8, 2018.
[2] *City of Riverside Fire Department, Standard of Cover.* City of Riverside. Page 38. 2017.

minute response time for the first arriving units ninety percent of the time for all EMS and fire related incidents. The Fire Department arrives within 9minutes 29 seconds of a call ninety percent of the time.[2] The first arriving unit is capable of advancing the first line for fire control, initiating rescue, or providing basic life support for medical incidents.

Police Protection. The City of Riverside Police Department (RPD) provides police protection services to the City. RPD operates from three major facilities to deliver services to community residents, divided into four geographical service areas called Neighborhood Policing Centers (NPCs). The headquarters building (4102 Orange Street) serves RPD's administrative center, housing the Office of the Chief of Police, Administrative Services, and the Records Bureau. The Project is located within the Central NPC, which is served by the Magnolia Station (10540 Magnolia Avenue, Suite B) which is the base of operations for Central and West NPC Field Operations, Central and Special Investigations Bureau, Traffic Divisions, Special Operations, and Internal Affairs. The North and East NPC Field Operations are based out of the Lincoln Station (8181 Lincoln Avenue). Within the NPCs there are 134 smaller geographic areas referred to as Police Reporting Districts (RD). The proposed Project is within the RD I12.

The RPD provides first response to all emergencies, performs preliminary investigations, and provides basic patrol services to the City. The Field Operations Division, which houses RPD's uniformed services, is staffed by 130 sworn officers, 24 Sergeants, 6 Lieutenant Watch Commanders, 1 Executive Lieutenant, 1 Traffic Lieutenant and civilian support staff.[3]

Incoming calls requesting police services are assigned by urgency. Priority 1 calls are typically of a life-threatening nature, such as a robbery in process or an accident involving bodily injury. Police officers strive to respond to Priority 1 calls immediately and will often be pre-empted from lesser priority calls to do so. Officers will respond to less urgent priority calls as soon as they are available to do so, categroized by priorities 2-4. These types of calls are not life threatening and include such incidents as burglary, petty theft, shoplifting, etc. The average response time for emergency calls in the service area for the Project site is similar to the response time of emergency calls throughout the City.

In addition to the RPD, the CBU Department of Safety Services (DSS) assists with the protection of students, employees, and property. Safety Services officers employed by the University are non-sworn security officers and derive their enforcement powers under Section 837 of the California Penal Code. DSS consists of a full-time staff including a director, assistant director,

---

2 *Ibid*. Page 54.

3 *Field Operations Division.* Riverside Police Department. https://riversideca.gov/rpd/fieldops/fieldops.asp. (Accessed February 23, 2018).

department supervisors, officers, dispatchers and support staff, augmented by part-time student workers who perform less critical tasks. DSS's jurisdiction extends only to University owned/leased property boundaries, including those of extension campuses and non-campus properties, and off-campus University events.

Schools. The Riverside Unified School District (RUSD) and the Alvord Unified School District (AUSD) are the two districts serving the City. The majority of the City is served by the RUSD, featuring 29 elementary schools (grades kindergarten through 5), 7 middle schools (grades 6 thorugh 8), and 6 high schools (grades 9 through 12) serving 92 square miles.[4] The 2016-2017 student enrollment in the RUSD is 42,769 students.[5] The AUSD serves the western portion of the City [and a small portion of eastern Corona], featuring 14 elementary schools, 4 middle schools, and 3 high schools serving 31 square miles.[6] The 2016-2017 student enrollment in the AUSD is 19,255 students.[7]

The closest [public] schools to the CBU campus are Monroe Elementary School located at 8535 Garfield Street, Chemawa Middle School at 8830 Magnolia Avenue, and Ramona High School located at 7675 Magnolia Avenue.

Libraries. The City of Riverside Public Library (RPL) system comprises eight (8) library locations and serves a population of approximately 300,000 covering 85 square miles. The RPL provides approximately 425,000 books and other library materials, as well as 400 public access computers (including catalogs) and an annual circulation of 1.23 million.[8]

The closest public library to the CBU campus is the Arlington Library, located at 9556 Magnolia Avenue, approximately 1.2 miles southwest of the Project site. The historic Arlington Library serves neighborhoods along Magnolia Avenue on the west side of town was built in 1909 as a 4,000-square-foot facility. In response to a growing population and increased demand, the City identified a need to expand library services within the Arlington neighborhood and added a new wing in 2008. The renovated and expanded Arlington library is now over 13,000 square feet. The Arlington Library hosts a children's library, early childhood play area, community room, and space for the adult, magazine, teen, DVD and audiobook collections. There are 32 desktop

---

4 *Boundary Maps.* Riverside Unified School District. 2018. http://riversideunified.org/departments/business_services/home/. (Accessed February 23, 2018).

5 *Riverside Unified School District Enrollment.* Education Data Partnership. 2018. http://www.ed-data.org/district/Riverside/Riverside-Unified. (Accessed February 23, 2018).

6 *SchoolSite Locator*. Alvord Unified School District. http://apps.schoolsitelocator.com/?districtcode=13003#. (Accessed February 23, 2018).

7 *Alvord Unified School District Enrollment.* Education Data Partnership. 2018. http://www.ed-data.org/district/Riverside/Alvord-Unified. (Accessed February 23, 2018).

8 *About the Library*. Riverside Public Library. http://www.riversideca.gov/library/about.asp. (Accessed August 29, 2017).

computers, 10 laptop computers, a 3D printer and other new technologies available for public use. The community room is available for rental by community groups.

Community Centers and other public facilities. The City features nine community centers, three senior citizen centers, and two service centers hosting a variety of programs, classes, activities, and sports for residents of all ages. In addition, these facilities serve the public with meeting rooms, gymnasiums, and multi-purpose rooms available for rental. The closest community centers to the CBU campus are the Ysmael Villegas Center (3091 Esperanza Street) and the Joyce Jackson Center (5505 Dewey Avenue), both of which host a variety of athletic and dance activities and provide venues for special events such as conferences, concerts, art festivals, and weddings.

4.14.2 Related Regulations

Federal Regulations

Fire and Police Protection

Higher Education Act of 1965. Title IV of the Higher Education Act of 1965 requires each eligible institution participating in any program under this title to collect information with respect to campus crime statistics and campus security policie, and prepare, publish, and distribute, through appropriate publications or mailings, to all current students and employees, and to any applicant for enrollment or employment upon request, an annual security report containing information with respect to the campus security policies and campus crime statistics of that institution.

State Regulations

Fire Protection

California Fire Code. The California Fire Code (CFC; California Code of Regulations Title 24, Part 9) sets forth requirements including emergency access, emergency egress routes, interior and exterior design and materials, fire safety features including sprinklers, and hazardous materials. The CFC is issued on a 3-year cycle; the 2016 Edition (the most recent version, which took effect January 1, 2016) of the CFC is adopted and incorporated by reference in Chapter 16.32 (Fire Code) of the City's Municipal Code.

California Building Code. Title 24 of the California Code of Regulations, also known as the California Building Code (CBC or Title 24), contains the design standards that govern the construction of buildings in California to "safeguard life or limb, health, property, and public welfare by regulation and controlling the design, construction, quality of materials, use and occupancy, location and maintenance of all buildings and structures and certain equipment." The current edition of the CBC (2016) contains general building design and construction

requirements relating to fire and life safety, structural safety, and access compliance. The CBC is composed of 12 parts. Part 2 of the CBC outlines building design and construction requirements relating to fire, life safety, and structural safety. Part 7, California Elevator Safety Construction Code, and Part 9, California Fire Code, which provide the standards related to elevator construction and provide overall regulations and design features pertaining to fire safety, have been adopted by reference within the Riverside Municipal Code (Chapter 16.08 of the RMC) and Riverside Fire Code. Typical fire safety requirements of the CBC include the installation of sprinklers in all high-rise buildings, the establishment of fire resistance standards for fire doors, buildings materials, and particular types of construction, and the clearance of debris and vegetation within a prescribed distance from occupied structures. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies.

California Health and Safety Code. Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also contained in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Schools

The RUSD is regulated by the California Education Code and governed by the State Board of Education. Traditionally, the State has enacted legislation for the funding of local public schools and provided the majority of monies to fund education in the State. To assist in providing facilities to serve students generated from new development projects, the State has enacted a variety of funding legislation, as described below.

California State Assembly Bill 2926. To assist in providing facilities to serve students generated from new development projects, the State enacted Assembly Bill 2926 in 1986, which allows school districts to collect impact fees from developers of new residential, commercial, and industrial developments. The bill was expanded and revised in 1987 through the passage of AB 1600, which added Sections 66000 et seq. to the Government Code. Under this statute, payment of impact fees by developers serves as California Environmental Quality Act (CEQA) mitigation to satisfy the impact of development on school facilities.

Senate Bill 50 and California Education Code Section 17620. Senate Bill 50 (SB 50), the Leroy F. Greene School Facilities Act of 1998, was signed into law on August 27, 1998. SB 50 (codified as California Education Code Section 17620) provides a comprehensive school facilities financing and reform program and enables a statewide bond issue to be placed on the ballot. Under the provisions of SB 50, school districts are authorized to collect fees to offset the costs associated with increasing school capacity as a result of development and related population increases. The funding goes toward acquiring school sites, constructing new school

facilities, and modernizing existing school facilities. SB 50 establishes a process for determining fee amounts charged to developers to mitigate the development impacts on school districts from increased enrollment. According to Section 65996 of the California Government Code, development fees authorized by SB 50 are deemed to be "full and complete school facilities mitigation."

The payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to levels that are less than significant (see California Government Code Section 65996). Stated another way, the provisions of Senate Bill 50 provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local laws.

There are three levels of developer fees that may be imposed upon new development by the governing school district. Level I fees are assessed based upon the proposed square footage of residential, commercial/industrial, and/or parking structure uses. Level II fees require the developer to provide one-half of the cost of accommodating students in new schools, and the State provides the remaining half. To qualify for Level II fees, the board of the governing school district must adopt a School Facilities Needs Analysis and meet other prerequisites in accordance with Section 65995.6 of the California Government Code. Level III fees apply if the State runs out of bond funds, allowing the governing school district to impose 100 percent of the cost of the school facility or mitigation, minus any local dedicated school monies, on the developer.

Senate Bill 50 allows school districts to levy a fee, charge, dedication, or other requirement against any development project within its boundaries for the purpose of funding the construction or reconstruction of school facilities. The maximum fee amount that school districts can assess is limited by statutes provided in California Government Code Section 65995.

The California Department of Education (DOE) permits local school districts to increase facility fees subject to DOE review and with approval of a nexus study from the school District that demonstrates that costs incurred by the school district for the provision of school facilities and services are higher than Level 1 funding provides. In such an instance, a nexus must be demonstrated in the study between the increase proposed by the local school District and the actual cost of provision of school facilities and services.

Police Protection, Libraries, and Community Centers

There are no state regulations directly applicable to tehse public services with respect to this Project.

Local Regulations

City of Riverside General Plan 2025. The Public Safety, Education, Public Facilities and Infrastructure, and Land Use Elements of the City's *General Plan 2025* establish the City's goals for fire prevention, police services, schools facilities, libraries, in addition to community facilities and emergency services generally. Each objective is supported by specific policy goals; the policies relevant to the proposed Project are featured below.

Fire Protection

Public Safety Element

Objective PS-6: Protect property in urbanized and nonurbanized areas from fire hazards.

Policy PS-6.1:	Ensure that sufficient fire stations, personnel and equipment are provided to meet the needs of the community as it grows in size and population.
Policy PS-6.2:	Endeavor to meet/maintain a response time of five minutes for Riverside's urbanized areas.
Policy PS-6.3:	Integrate fire safety considerations in the planning process.
Policy PS-6.4:	Evaluate all new development to be located in or adjacent to wildland areas to assess its vulnerability to fire and its potential as a source of fire.
Policy PS-6.5:	Mitigate existing fire hazards related to urban development or patterns of urban development as they are identified and as resources permit.
Policy PS-6.6:	Continue to implement stringent brush-clearance requirements in areas subject to wildland fire hazards.
Policy PS-6.7:	Continue to involve the City Fire Department in the development review process.
Policy PS-6.8:	Pursue strategies that maintain and improve the City's Class 2 ISO rating.
Policy PS-6.9:	Provide outreach and education to the community regarding fire safety and prevention.
Policy PS-6.10:	Identify noncontiguous streets and other barriers to rapid response and pursue measures to eliminate the barriers.

Police Protection

Public Safety Element

Objective PS-7: Provide high-quality police services to all residents and businesses in Riverside.

Policy PS-7-1: Deploy human and financial resources to ensure adequate and equitable distribution of police services.

Policy PS-7.2: Support the transition of the Riverside Police Department from a centralized agency to one built around precincts as a means of providing more rapid, equitable and proactive community policing services.

Policy PS-7.3: Coordinate police services with college and university campus police forces and private security forces.

Policy PS-7.4: Coordinate with the Riverside County Sheriff in its efforts to provide law enforcement services within Sphere of Influence areas.

Policy PS-7.5: Endeavor to provide minimum response times of seven minutes on all Priority 1 calls and twelve minutes on all Priority 2 calls.

Policy PS-7.6: Empower police, public safety personnel and residents to develop innovative methods to reduce or prevent crime.

Objective PS-10: Improve the community's ability to respond effectively to emergencies.

Policy PS-10.1: Ensure that Police and Fire service facilities are strategically located to meet the needs of all areas of the City.

Policy PS-10.3: Ensure that public safety infrastructure and staff resources keep pace with new development planned or proposed in Riverside and the sphere of influence.

Policy PS-10.9: Maintain a safe and secure, technologically advanced Emergency Operations Center allowing for room to expand as the City grows.

Schools

Education Element

Objective ED-1: Accommodate the growth of all educational facilities.

Policy ED-1.1: Provide an adequate level of infrastructure and services to accommodate campus growth at all educational levels.

Policy ED-1.2: Work with the school districts to locate school sites where infrastructure already exists to minimize costs to the various districts in new school construction.

Policy ED-1.3: Include school district staff in the review of annexation proposals to guide campus site selection and desirable design elements.

Policy ED-1.4: Streamline the permitting process for educational facilities as practicable.

Libraries

Education Element

Objective ED-5: Ensure that the library system remains a premier information and independent learning resource for the Riverside residents and a complement to formal education.

Policy ED-5.1: Provide ample and convenient library facilities.

Public Facilities and Infrastructure Element of the City's *General Plan 2025* also includes a goal for the satellite, virtual resources libraries run by the Riverside Public Library, which are named "Cybraries."

Objective PF-8: Expand the accessibility of internet and similar communications services throughout the community.

Policy PF-8.3: Expand development of cybraries.

Land Use Element of the City's *General Plan 2025* also includes a goal for the placement of effective, adequate community facilities.

Objective LU-26: Ensure that a network of modern, effective and adequate community facilities are equitably distributed across the entire City.

Policy LU-26.1: Develop and enforce standards for community facilities (such as fire and police stations, libraries and parks) based upon population densities and proximity of existing facilities.

Riverside Municipal Code (RMC). The RMC was established to protect the public's health, safety and quality of life. There are three chapters of the RMC that concern public services, each listed below.

Chapter 16.52 **Development Fees for Fire Stations**. This chapter provides development fees to be used for the purchase of fire station land, construction, equipment, and furnishings. (Ord. 5948 § 1, 1991)

Chapter 16.32 **Fire Prevention.** This chapter discusses a range of fire prevention measures and topics concerning the RFD, including the required water supply for for buildings, fire prevention enforcement powers, connecttions to the fire department, and the designation of Very High Fire Hazard Severity Zones (VHFHS).

Chapter 16.08 **Building Standards.** This chapter identifies the requirements of building construction, alterations, occupancy, use, maintenance concerning RFD such as exiting, emergency lighting, and fire rated construction.

Measure I. The City placed Measure I on the ballot in 2011 in response to the anrticipated expiration of Measure C, a $19 million annual parcel tax used for library services, in June of 2012. Measure I passed with an 85 percent majority, continuing the $19 million annual parcel tax for another 10 years to fund library services through June 2022.

4.14.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts. Based on Appendix G, a development project could have a significant impact on public servies if the proposed Project would:

- (Threshold A) Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

- (Threshold B) Result in substantial adverse physical impacts associated with the provision of new or physically altered fire facilities, need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

- (Threshold C) Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

- (Threshold D) Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios.

- (Threshold E) Result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, need for new or physically

altered public facilities, the construction of which could cause significant environmental impacts.

Methodology

The evaluation of fire and police service impacts takes into account information on current fire and police service levels, and whether the Project would require new or physically altered fire department or law enforcement facilities in order to main satisfactory service levels. Applicable fire codes and regulations and the City Municipal Code were also reviewed in determining impacts.

School service impacts are determined by calculating how many schoolchildren would be generated by the Project, and then determining whether this increase would cause negative impacts to existing or future school facilities or programs.

In the absence of specific demand factors for libraries and other public facilities (e.g., community centers), a general discussion of libraries and other public facilities and potential project-related increases in demand on these facilities and associated environmental impacts from new or physically altereded facilities is provided.

4.14.4 Project Design Features

The proposed Project is currently developed with the CBU campus. The Project is a Univesity and does not propose general purpose residential other than student housing and would not generate school aged children. Additionally, CBU has its own library and private security.

4.14.5 Environmental Impacts Before Mitigation

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

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

DSS officers employed by CBU are non-sworn security officers and derive their enforcement powers under Section 837 of the California Penal Code. DSS consists of a full-time staff

including a director, assistant director, department supervisors, officers, dispatchers and support staff, augmented by part-time student workers who perform less critical tasks. DSS's jurisdiction extends only to CBU owned/leased property boundaries, including those of extension campuses and non-campus properties, and off-campus University events, so safety services provided by DSS is not adversely affected by the non-CBU population. As the CBU population grows, so too does the DSS to maintain service ratios and enhance the safety and security of the CBU community. CBU certifies that it has established a campus security policy, is carrying out that policy, and meets the disclosure requirements of Title IV of the Higher Education Act of 1965 regarding campus security policies and crime statistics.

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

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

As proposed, the Project will directly induce population growth that was not considered under the City's *General Plan 2025*. However, adequate fire facilities and services are provided by Station 10 located at 2590 Jefferson Street and Station 2 located at 9450 Andrew Street to serve this Project. The Project will not result in the intensification of land use, and it will not generate the construction of new or expansion of existing fire service facilities from the increase in the demand for fire facilities or services. According to CBU's *2016 Annual Report of Fire Information and Statistics,* only one (1) fire was reported on the CBU campus in three years between 2014 nd 2016.[9] The nature of the fire was food left on the stove, and there were no reported injuries or deaths.

CBU has several types of residential housing available to students, and fire safety systems are installed through the DSS based upon the type of construction pursuant to applicable provisions of the CBC. Additionally, DSS strictly regulates the use of portable electrical devices, smoking

[9] *Annual Report of Campus Security Policies and Crime Statistics and Annual Report of Fire Information and Statistics, California Baptist University Man Campus and Related Non-Campus Propeorties, Report for 2016.* Page 23. California Baptist University Department of Safety Services. September 2017.

and open flames in student housing areas. These regulations are distributed to students in the Student Handbook and/or written agreements relating to use of student housing, reviewed with residential students through community meetings where attendance is mandatory, and enforced through regular inspection of premises by Resident Life staff members. DSS disseminates fire safety and training programs to students, faculty, and staff through different forums depending upon the audience, and regularly conducts fire drills to ensure the health and safty of all students and staff, which further reduces demand on fire protection services. Finally, DSS continually reviews fire safety planning, education, and systems and, in consultation with local fire officials, determines necessary improvements by establishing and supporting policies and procedures, and implementing change as appropriate. Through the safety services provided by the DSS, City *General Plan 2025* policies, compliance with existing codes and standards, and through Fire Department practices, there will be **less than significant impacts** on the demand for additional fire facilities or services. No mitigation is required.

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

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

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

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

Threshold E: Result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, need for new or physically altered public facilities, the construction of which could cause significant environmental impacts..

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

4.14.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to public services have been found to be potentially significant, no mitigation measures are required.

4.14.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates the Project will have no impacts to public services. Therefore, no mitigation measures are required.

4.14.8 References

14 CCR 15000–15387 and Appendices A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Alvord Unified School District. *SchoolSite Locator.* http://apps.schoolsitelocator.com/?districtcode=13003#. (Accessed February 23, 2018).

CAL FIRE. Cooperative Efforts. 2012. http://calfire.ca.gov/fire_protection/fire_protection_coop_efforts_stategov. (Accessed June 30, 2016).

City of Riverside, California Baptist University Specific Plan. Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside, *California Baptist University Specific Plan, Public Review Draft.* August 2018.

City of Riverside, City of Riverside General Plan 2025. November 2007, Amended November 2012 and March 2013.

City of Riverside, City of Riverside General Plan 2025 Final Program Environmental Impact Report. December 2007.

City of Riverside, Riverside Fire Department, Operations. https://www.riversideca.gov/fire/operations.asp. (Accessed April 16, 2016).

City of Riverside, Riverside Fire Department, Standard of Cover. 2017.

City of Riverside, Riverside Police Department, Field Operations Division. https://riversideca.gov/rpd/fieldops/fieldops.asp. (Accessed February 23, 2018).

City of Riverside, Riverside Police Department. https://riversideca.gov/rpd/fieldops/fieldops.asp. (Accessed February 23, 2018).

City of Riverside, Riverside Public Library, About the Library. http://www.riversideca.gov/library/about.asp. (Accessed August 29, 2017).

Education Data Partnership. Alvord Unified School District Enriollment. 2018. http://www.ed-data.org/district/Riverside/Alvord-Unified. (Accessed February 23, 2018).

Education Data Partnership. Riverside Unified School District Enriollment. 2018. http://www.ed-data.org/district/Riverside/Riverside-Unified. (Accessed February 23, 2018).

Koppell & Gruber. Riverside Unified School District School Facilities Needs Analysis. Riverside. 2016.

McDowell, Jennifer. Fire Marshall. City of Riverside Fire Prevention Bureau. Personal Communication. January 8, 2018.

Riverside Public Library.

Riverside Unified School District. *Boundary Maps.* 2018. http://riversideunified.org/departments/business_services/home/. (Accessed February 23, 2018).

THIS PAGE INTENTIONALLY LEFT BLANK

4.15 RECREATION

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines, the focus of the following analysis addresses the Project's potential to include, require the construction, or expansion of parks and recreational facilities within the City. No comments regarding recreation were received in response to the NOP.

4.15.1 Setting

The public parks and recreational facilities in the City of Riverside are administered by the City Parks, Recreation, and Community Services Department. According to the City's General Plan (GP) 2025, the City's park areas consist of local parks, City-wide/special use parks, and reserve/open space parks encompassing more than 2,300 acres.[1] The City manages a total of 51 public parks and open space areas.[2] The City also has various joint-use agreements with Riverside County Flood Control District, Alvord Unified School District, Riverside Community College and University of California – Riverside, which include the use of facilities such as ball fields, tennis courts, swimming pools and a sports complex. A number of multi-use trails are located throughout the City and provide connections to open space areas and parks; parkways such as Magnolia Avenue provide safe and aesthetically pleasing corridors for pedestrians and cyclists, and are considered a part of the "Riverside Park," which includes parks and parkways within the City.[3] Nevertheless, there is a general Citywide parkland shortage, as developed park acres within the City total approximately 2.0 acres per thousand residents, short of the statewide standard of 3.0 acres per thousand residents pursuant to the Quimby Act (California Government Code 66477).[4]

As detailed in Figure 2 of the *City of Riverside Park & Recreation Master Plan*, the Project site is not located within an area identified to have a parkland shortage.[5] The three nearest parks to the CBU Specific Plan Zone are Hunt Park, which is located 0.3 mile west of the Project site, Don Derr Park, which is located 0.4 mile southeast of the Project site, and Don Jones Park, which is located 0.5 mile northeast of the Project site.

Existing Recreational Facilities and Open Space within the CBU Specific Plan Zone

1 *Parks and Recreation Element, Riverside General Plan 2025.* City of Riverside. Adopted 2007, Amended November 2012.

2 *Parks, Recreation, and Community Service Website - Park Facilities.* City of Riverside. https://www.riversideca.gov/park_rec/facilities-parks (Accessed August 31, 2017).

3 *Magnolia Avenue Specific Plan*, Resolution No. 21931. City of Riverside. Adopted November 2009.

4 *Park and Recreation Master Plan Update* 2003. Page 3. City of Riverside. https://www.riversideca.gov/park_rec/sites/riversideca.gov.park_rec/files/pdf/Parks-MP/2003-PARK-MASTER-PLAN.pdf. (Accessed August 31, 2017).

5 *Ibid.* Figure 2.

Major components of CBU's open space and recreation areas include the approximately 6.7-acre Magnolia Lawn in the northern portion of the CBU Specific Plan Zone and approximately 11.5-acre Lancer Outdoor Sports Complex comprised of athletic fields (e.g., baseball diamonds, soccer fields, practice fields, designated intramural fields) and sports facilities (e.g., tennis courts, swimming pool, gymnasium) in the southwest portion of the CBU Specific Plan Zone. In addition, CBU contains a network of residential open space consisting of smaller courtyards, plazas and lawns that are integrated into the student housing areas located throughout the CBU Specific Plan Zone (Figure 4.4-1 in Section 4.4 - *Biological Resources*).

4.15.2 Related Regulations

Federal Regulations

There are no federal regulations regarding parks and recreation that apply to the proposed Project.

State Regulations

Quimby Act (California Government Code 66477). The Quimby Act was established by California legislature in 1965 to provide parks for the growing communities in California. The Act authorizes cities to adopt ordinances addressing parkland and/or fees for residential subdivisions for the purpose of providing and preserving open space and recreational facilities and improvements. The Act requires the provision of 3 acres of park area per 1,000 residents. The Act also specifies acceptable uses and expenditures of such funds. Because the City is a Charter City, it is not subject to the Quimby Act, but the City does base their analysis and imposition of appropriate Park Development Impact Fees from the requirements of the Quimby Act.

Local Regulations

City of Riverside General Plan 2025. The City's *General Plan 2025* Parks and Recreation Element outlines parkland dedication requirements based on the *Park and Recreation Master Plan Update 2003*, as discussed above. In addition, this element defines parkways such as Magnolia Avenue as specialized open spaces that are valuable City assets, offer limited recreational uses, and provide safe and aesthetically pleasing corridors for pedestrians, cyclists, and equestrians.

The City's *General Plan 2025* Open Space and Conservation Element provides an inventory of existing and planned open space uses, as well as objectives and policies to ensure the continued preservation, development, and management of open space resources within the City.

The City's *General Plan 2025* Education Element provides an inventory of existing and planned educational facility uses, as well as objectives and policies to ensure the continued preservation, development, and management of educational facilities within the City.

The following policies pertaining to parks and recreation are obtained from the City's *General Plan 2025* and are applicable to the proposed Project. Although listed here, each of these policies are presented in Table 4.10.A of the Land Use and Planning Section of the Draft EIR with an evaluation of the Project's consistency with the stated policies.

Parks and Recreation Element[6]

Objective PR-1: Provide a diverse range of park and recreational facilities that are responsive to the needs of Riverside residents.

Policy PR-1.1: Implement the policies of the City of Riverside Park and Recreation Master Plan. Revise the neighborhood/community park ratio standard to two acres of community parks and one acre of neighborhood parks per one thousand residents.

Policy PR-1.3: Encourage private development of recreation facilities that complement and supplement the public recreational system.

Policy PR-1.5: Locate parks adjacent to compatible use areas, such as residential uses, greenbelts, bicycle corridors, schools and natural waterways to minimize the negative impacts of adjacent land uses.

Policy PR-1.6: Develop standards to design park facilities and landscaping that enhance and preserve natural site characteristics as appropriate, to minimize maintenance demands and to incorporate xeriscape (low-water demand) principles where feasible.

Objective PR-2: Increase access to existing and future parks and expand pedestrian linkages between park and recreational facilities throughout Riverside.

Policy PR-2.3: Improve and create more connections and increase the safety of the bicycling, equestrian and pedestrian trail system within the City.

Open Space and Conservation Element[7]

Objective OS-1: Preserve and expand open space areas and linkages throughout the City and sphere of influence to protect the natural and visual character of the community and to provide for appropriate active and passive recreational uses.

---

9 Riverside Municipal Code. *Chapter 16.60, Local Park Development Fees.* https://www.riversideca.gov/municode/pdf/16/16-60.pdf. (Accessed August 31, 2017).

9 Riverside Municipal Code. *Chapter 16.60, Local Park Development Fees.* https://www.riversideca.gov/municode/pdf/16/16-60.pdf. (Accessed August 31, 2017).

Policy OS 1.5: Require the provision of open space linkages between development projects, consistent with the provisions of the Trails Master Plan, Open Space Plan and other environmental considerations including the MSHCP (Multiple Species Habitat Conservation Plan).

Policy OS-1.6: Ensure that any new development that does occur is effectively integrated through convenient street and/or pedestrian connections, as well as through visual connections.

Education Element[8]

Policy ED-2.5: Work with the colleges and universities to promote their great arts and culture programs throughout the community.

Riverside Municipal Code. The City requires the payment of development fees or dedication of land for local, regional, and/or reserve park acquisition, and development and improvement on new development (including nonresidential units) as follows:

Chapter 16.60, Local Park Development Fees. The City imposes development fees for park development on the construction or placement of all nonresidential units, new dwelling units, and new mobile homes. In lieu of payment of all or a portion of the Local Park Development Fee, land may be dedicated to the City of Riverside for park and recreational purposes if the requirements outlined in Chapter 16.60.035 of the City of Riverside Municipal Code are met. [9]

Chapter 16.44, Regional Parks and Reserve Parks Development Fee. The City imposes development fees for the acquisition and development of regional parks and reserve parks, and if necessary, to be utilized for interfund borrowing for local parks. These development fees are imposed on projects where a building permit for new development is issued pursuant to Chapter 16.08 of the Riverside Municipal Code for a structure or a portion of a structure which is not a replacement for a structure or portion of a structure which existed on the same site on January 1, 1990.[10]

Chapter 16.76, Trails Development Fee. The City imposes development fees for the acquisition and development of trails on projects where a building permit for new development is issued pursuant to Chapter 16.08 of the Riverside Municipal Code for a

[9] Riverside Municipal Code. *Chapter 16.60, Local Park Development Fees.* https://www.riversideca.gov/municode/pdf/16/16-60.pdf. (Accessed August 31, 2017).

[9] Riverside Municipal Code. *Chapter 16.60, Local Park Development Fees.* https://www.riversideca.gov/municode/pdf/16/16-60.pdf. (Accessed August 31, 2017).

[10] Riverside Municipal Code. *Chapter 16.44, Regional Parks and Reserve Parks Development Fee.* https://www.riversideca.gov/municode/pdf/16/16-44.pdf. (Accessed August 31, 2017).

structure or a portion of a structure which is not a replacement for a structure or portion of a structure which existed on the same site on January 1, 1990. [11]

City of Riverside Parks and Recreation Master Plan. The City adopted the *Parks and Recreation Master Plan Update* in 2003. The purpose of the *Parks and Recreation Master Plan Update 2003* is to address the adequacy of the City's park and recreational facilities and trails, as well as future needs and opportunities. The *Parks and Recreation Master Plan Update 2003* provides an inventory of planned open space uses, as well as goals, policies, plans, and management of open space resources within the City in order to meet the State standard of 3 acres of parkland per one thousand residents.

The *Parks and Recreation Master Plan Update 2003* also addresses the *Trails Master Plan* and makes recommendations to the trails system as it pertains to park, recreation and open space connections. In addition, the *Parks and Recreation Master Plan Update 2003* describes current City standards for parkland distribution as 3 developed acres of parkland per one thousand residents in accordance with the Quimby Act. These standards are further broken down into 2 acres of community parkland and one acre of neighborhood parkland per one thousand residents for a total of 3 acres of parkland per one thousand residents for a ratio of 2:1 (acres of neighborhood parks to acres of community parks). However, according to the *Parks and Recreation Master Plan Update 2003*, the City has trended toward 2 acres of community parks per one thousand residents to one acre of neighborhood parks per thousand residents.[12]

CBUSP Amendment. The proposed CBUSP Amendment will replace the 2013 CBUSP in its entirety to facilitate a more urban-style development schema, but the objectives and policies proposed in the CBUSP Amendment mirror those under which CBU development is currently administered.

Additionally, the proposed CBUSP Amendment will replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan* within the CBUSP Zone. Two properties west of Monroe Street (Assessor's Parcel Numbers 233-12-0010 and 233-11-0045) will be amended and removed out of the *Magnolia Avenue Specific Plan* and incorporated into the CBUSP Amendment as part of the proposed Project. According to the *Magnolia Avenue Specific Plan*, proximity of the Magnolia Heritage District to CBU provides

[11] Riverside Municipal Code. *Chapter 16.76, Trails Development Fee.* https://www.riversideca.gov/municode/pdf/16/16-76.pdf. (Accessed August 31, 2017).

[12] *Park and Recreation Master Plan Update* 2003. Page 23. City of Riverside. https://www.riversideca.gov/park_rec/sites/riversideca.gov.park_rec/files/pdf/Parks-MP/2003-PARK-MASTER-PLAN.pdf. (Accessed August 31, 2017).

opportunities to redevelop the general area with higher density, mixed use development that would complement the University.[13]

The following objectives and policies pertaining to recreation and park resources are drawn from the CBUSP Amendment and are applicable to the proposed Project.

Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.

Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.

Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.

Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.

Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.

Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.

Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus.

Policy 4.5 Provide adequate and conveniently located bicycle racks throughout the campus.

[13] *Magnolia Avenue Specific Plan.* Resolution No. 21931. Page 3-26. City of Riverside. Adopted November 10, 2009.

4.15.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on park and recreation resources if it would:

- (Threshold A) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and/or

- (Threshold B) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Methodology

The Project site was assessed via the City's General Plan 2025; Park and Recreation Master Plan Update 2003, and applicable chapters of the Riverside Municipal Code (i.e., Title 16 - Buildings and Construction). The potential impacts of the proposed Project on recreation and park resources were evaluated based on whether implementation of the proposed Project could result in increased use of existing recreation and park resources, or whether implementation of the proposed Project could necessitate the construction or expansion of recreation and park facilities.

4.15.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through design. The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions to provide a more urban-style campus, with educational, residential, recreational, and other campus life facilities closely integrated to strengthen the campus identity.

CBUSP Amendment Development Plan

Chapter 3 of the proposed CBUSP Amendment provides a development plan for campus boundary and facility expansions in order to facilitate an increase in student enrollment. The open space and recreation plan will ensure students have a place for relaxation, recreation, contemplation, and gathering and will contribute to the ambiance and character of the campus.

Residential open space. Under a more urban-intensity model, CBU may modify internal open space areas and balconies of residential apartment complexes that would be transitioned to traditional student residences, which could include reducing individual open space areas, in order to reflect a development character more suitable to student life. Any loss of such open spaces

within the residential complexes would be offset by students' access to the common open space on the campus.

Campus open spaces are intended for use by the entire campus community and include the network of plazas, courtyards, and public green spaces such as Magnolia Lawn, Stamps Courtyard at the Yeager Center, Harden Square at the James Building, Annie Gabriel/Wallace Building Commons, the Brisco's courtyards, and residence courtyards in University Place. The water quality basin along Magnolia Avenue is a depression of mowed grassy lawn accessible by the student-body for strolls, picnics, ball and Frisbee games, etc. Landscape plans will meet the landscape requirements described in Chapter 5 of the CBUSP Amendment, as described below, and will be reviewed at the time of Site Plan and Design Review by the City (as applicable).

Athletic and recreational facilities include the Lancer Outdoor Sports Complex comprised of athletic fields (e.g., baseball/softball diamonds, soccer fields, practice fields, designated intramural fields) and sports facilities (e.g., tennis courts, swimming pool, gymnasium). Proposed improvements to these facilities include enhanced stadium seating capacity for baseball, softball, and soccer fields, up to 3,000, 2,000, and 3,000 spectators, respectively, as well as upgrades to the aquatic facility such as pool upgrades, bleacher improvements, and enhanced concession facilities.

Buffers. The perimeter of the campus will have a formalized landscape treatment that unifies the contiguous campus boundaries. The treatment will vary to accommodate existing structures and planned development. A landscaped buffer treatment will be provided around all parking structures to soften the impact of the structure. Landscaped treatments within parking lots will include islands and tree wells to ease vehicular and pedestrian circulation and to provide shade. Linkages within the main campus and from the surrounding community will be strengthened, and pedestrian pathways will continue to be distinct as the University enhances the campus walkability and security.

CBUSP Amendment Development Standards

Chapter 4 of the proposed CBUSP Amendment provides land use regulations and development standards[14] intended to support the CBUSP Amendment's objectives and policies as they relate to recreation and parks resources and to:

- Use green space and informal recreation areas to provide transition between the campus and surrounding areas along Magnolia Avenue.

[14] *California Baptist University Specific Plan, Public Review Draft.* Chapter 3 Section C. Chapter 4 Section A. City of Riverside. August 2018.

- Accommodate recreation and intramural activities at open space areas throughout the campus, as determined by the campus intramural and athletic department's needs.
- Maintain an open space in the form of the Magnolia Lawn/water quality basin. Additional plazas will be located in the interior portion of campus to create a strong campus identity.
- Maintain CBU as a pedestrian-oriented campus.

CBUSP Amendment Design Elements

Chapter 7of the proposed CBUSP Amendment provides specific design elements to guide the architectural, landscape, site furnishing, streetscape, entrance and corner, fence and wall, open space, lighting, signage, and campus art design to ensure a cohesive, aesthetically pleasing, and safe campus in accordance with the CBUSP Amendment objectives and policies.[15] For the CBU Specific Plan Zone, these design guidelines replace the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan*.

Landscape design will be implemented to achieve unification encompassing the entire campus area while respecting the area's historic context. Continuity is achieved through the use of hardscape materials, plant materials, and planting character arranged in various scales and intensities to maintain CBU's park-like campus setting. Irrigated turf would be limited in use to athletic fields and commons areas. Although the historic Magnolia Lawn shall remain as natural, irrigated turf, consideration of artificial turf would be made for athletic fields.

Site furnishing design will include street elements such as decorative paving and fountains, and benches, bollards, and bicycle parking to enhance the pedestrian environment.

Streetscape design will maintain much of the existing mature landscaping and improvements and continue to build upon the established streetscape palette with an increased emphasis on the pedestrian and bicycle environments. To make the CBU campus more pleasant, safe, and inviting for pedestrians and bicyclists, the streetscape will be enhanced with distinctive street furnishings, lighting, and paving, as well as enhanced gathering spaces. The streetscape concept along Magnolia Avenue, Adams Street, and Monroe Street will require greater coordination with the City Planning Division and Public Works Department to ensure that any and all hardscape, sidewalks, street furniture, and street light improvements within public rights-of-way are compatible with existing conditions and/or anticipated improvements.

Open space design includes a network of open spaces of varying sizes and for a variety of purposes. The open space network is anchored by a triangulated axis of expansive open space

[15] *California Baptist University Specific Plan, Public Review Draft.* Chapter 7 Section B. Section D-J. City of Riverside. August 2018.

elements anchored by the Magnolia Lawn and athletic fields. Open space also includes natural landscaped areas and lawns, plazas, courtyards, and water quality basins. Throughout the campus, the open space design elements will ensure a park-like setting is maintained.

Campus art design will support the *Art on Campus Program,* which is designed to promote the involvement of artists in on-campus subsequent development and improvement projects. The program is intended to enhance the physical environment by celebrating CBU's unique character and identity, as well as create artistic harmony between the campus buildings, landscape, and open spaces. Examples of items qualifying as art include water features, decorative paving and mosaics, murals, sculptures, decorative carvings, ornamental benches, special light shows, and other items of a unique and high-quality nature that embody artistic elements.

These development standards and guidelines are intended to ensure design consistency throughout the CBU Specific Plan Zone for an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model. However, they retain a degree of flexibility to accommodate various development types within the CBU Specific Plan Zone and facilitate a compatible transition between the CBU Specific Plan Zone and adjacent properties that would be subject to the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan.*

CBUSP Amendment Implementation Methods

Chapter 8 of the proposed CBUSP Amendment provides methods, programs, and financing mechanisms to be used to implement the objectives, policies, development standards, and design elements in the CBUSP Amendment.[16] The CBU serves as the responsible party, meaning the University's Finance and Administration Department or other department as designated by the Finance and Administration Department, and the implementation timeframe shall be ongoing as subsequent development and improvement projects are proposed throughout the 2025 horizon of the CBUSP. These implementation methods serve as self-mitigating project design features required for all subsequent development and improvement projects to or in proximity to recreation and park resources.

Green Space. Additions, alterations, and new construction to the dormitories, expansion of Lots 6 & 7, and the realignment of Campus View Drive shall be designed to incorporate retention of green space, maintain geometric pattern of concrete walkways and lawn around and among the buildings, and minimize removal of mature trees.

[16] *California Baptist University Specific Plan, Public Review Draft.* Chapter 8 Section A. City of Riverside. August 2018.

4.15.5 Environmental Impacts Before Mitigation

Threshold A: Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The CBUSP Amendment is proposed by CBU to accommodate a projected increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. To accommodate growth in student population, in 2016 CBU provided 815,114 square feet of building area for academic and recreation purposes, including construction of the 158,000 square foot Events Center for hosting athletic and cultural/artistic events. CBU anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes by 2025.

Although the Project proposes an increase in student enrollment, any increase in population from implementation of the proposed CBUSP Amendment would be students that would be served by the existing CBU recreation and open space facilities, as well as additional recreation and open space facilities proposed pursuant to the CBUSP Amendment. As detailed in Section 4.15.4 above, the proposed CBUSP Amendment establishes a comprehensive development program for additional recreation and open space facilities to accommodate the anticipated increase in student enrollment. Additionally, the implementation methods described in Section 4.15.4 serve as self-mitigating project design features required for all subsequent development and improvement projects to or in proximity to recreation and open space resources.

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

Threshold B: Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As detailed in Section 4.15.4 above, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure it does not result in significant impacts from the use and/or construction of recreation and parks resources. Proposed improvements to existing athletic facilities include enhanced stadium seating capacity for baseball, softball, and soccer fields, up to 3,000, 2,000, and 3,000 spectators, respectively, as well as upgrades to the aquatic facility such as pool upgrades, bleacher improvements, and enhanced concession facilities.

Athletic open space will provide for athletic fields appropriate to the competitive division of college athletics with which CBU is affiliated. Various upgrades to athletic facilities will be required to accommodate an increase in the number of spectators at sporting events, as well as satisfy NCAA Division I standards. As detailed in Section 4.8, *Hazards and Hazardous Material*, of this EIR, any recreational facilities within [Riverside Municipal] Airport Land Use Compatibility Plan Zone D and E would be designed and constructed in accordance with the applicable provisions of the Riverside County Airport Land Use Commission (Refer to Section 4.8, *Hazards and Hazardous Material* for a detailed analysis).

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

As detailed in the discussion of Threshold A above, recreational and park facilities are proposed to partially accommodate the increase in demand on recreational and park facilities from the proposed student growth within the CBU Specific Plan Zone, and all subsequent development projects are required to pay Local Park Development Fees, Regional Parks and Reserve Park Development Fees, and Trails Development Fees to ensure the Project's fair share contribution towards the funds needed to construct additional recreational and park facilities is fulfilled. Through the provision of onsite recreational and park facilities and payment of related City fees,

the increase in demand on recreational and park facilities from population growth on campus will not result in a significant impact to existing City owned parks and recreational facilities.

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

As detailed in Table 2-3, *CBU Specific Plan Zone Permitted Uses and Supportive Uses,* of this Draft EIR (Table 4-1 of the CBUSP Amendment), construction of athletic facilities, recreation areas, open space, courtyards, and plazas, as well as amphitheaters, performing art theatres, and events centers with a seating capacity up to 2,499 within the CBU Specific Plan Zone shall be permitted by right. Amphitheaters, performing art theatres, and events centers with a seating capacity of 2,500 or more shall be conditionally permitted subject to the granting of a Minor Conditional Use Permit and pursuant to Chapter 19.730 of RMC Title 19 (*Zoning*) to adequately address any potential negative environmental impacts associated with the construction and operation of such venues within the CBU Specific Plan Zone.

All development permitted as a matter of right shall be subject to Administrative Design Review in accordance with Table 4.5.A, *Disposition of Properties Surveyed for Historic Significance,* of this Draft EIR (Table 6-1 in the CBUSP Amendment) and pursuant to the requirements of Chapter 8 of the CBUSP Amendment; specific minor improvements shall be exempt from further review, as indicated in Chapter 8. For any use for which a Minor Conditional Use Permit is required, the application for and processing of such permit shall comply with Chapter 19.730 of RMC Title 19 (*Zoning*), except that Section 19.730.030 (*Applicability and Permit Requirement*) shall not apply. For temporary uses that require additional City permits (e.g., health, fire, electrical) but that function to carry out the CBU's mission, such as commencement activities, a temporary use permit would be obtained. Non-classified uses may be permitted, subject to determination by the City's Director of Community and Economic Development that the proposed non-classified use is similar to an allowed use.

All future development administered by the CBU would be subject to Design Review by City Planning Staff to ensure design elements are proposed and implemented in accordance with the CBUSP Amendment, the City's *General Plan 2025*, and applicable provisions of the RMC. Future development projects will be required to pay development impact fees, including the Local Park

Development Fees, Regional Parks and Reserve Park Development Fees, and Trails Development Fees pursuant to Chapters 16.60, 16.44, and 16.76 of the RMC, respectively. Additionally, since any recreational facilities proposed as part of the Project would be constructed within the Project footprint already analyzed throughout this EIR and mitigated as applicable, impacts related to the provision of new recreational facilities or expansion of existing recreational facilities would be **less than significant**, and no mitigation is required.

4.15.5 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to recreation and park resources have been identified, no mitigation measures are required. Adherence to standard procedures, including applicable objectives and policies of the CBUSP Amendment including the provision of onsite recreational and park facilities, *Riverside General Plan 2025*, and Riverside Municipal Code, and payment of City park and recreation related fees will ensure all impacts related to recreation and park resources remain less than significant.

4.2.6 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates that the Project will not exceed significance criteria for recreation and park resources impacts. Therefore, all recreation and park resources impacts are less than significant, and no mitigation measures are required.

4.2.7 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

City of Riverside, *California Baptist University Specific Plan.* Resolution No, 22511, Ordinance No. 7203. Adopted March 26, 2013.

City of Riverside. *City of Riverside General Plan 2025*. Adopted November 2007, Amended November 2012 and March 2013.

City of Riverside, *Magnolia Avenue Specific Plan*. Resolution No. 21931. Adopted November 2009.

City of Riverside, *Park and Recreation Master Plan Update* 2003. https://www.riversideca.gov/park_rec/sites/riversideca.gov.park_rec/files/pdf/Parks-MP/2003-PARK-MASTER-PLAN.pdf. (Accessed August 31, 2017).

City of Riverside. *Parks, Recreation and Community Services Website - Park Facilities*. https://www.riversideca.gov/park_rec/facilities-parks (Accessed August 31, 2017).

City of Riverside, Riverside Municipal Code Chapter 13.18 – Trails Master Plan. https://www.riversideca.gov/municode/pdf/13/13-18.pdf. (Accessed August 31, 2017).

City of Riverside, Riverside Municipal Code Chapter16.60 – Local Park Development Fees. https://www.riversideca.gov/municode/pdf/16/16-60.pdf. (Accessed August 31, 2017).

City of Riverside, Riverside Municipal Code Chapter 16.44 – Regional Parks and Reserve Parks Development Fee. https://www.riversideca.gov/municode/pdf/16/16-44.pdf. (Accessed August 31, 2017).

City of Riverside, Riverside Municipal Code Chapter 16.76 – Trails Development Fee. https://www.riversideca.gov/municode/pdf/16/16-76.pdf. (Accessed August 31, 2017).

County of Riverside, *Riverside County Airport Land Use Compatibility Plan*. Adopted by Riverside County Airport Land Use Commission October 14, 2004.

THIS PAGE INTENTIONALLY LEFT BLANK

4.16 TRANSPORTATION AND TRAFFIC

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential traffic and circulation impacts associated with development of the Project. One comment addressing traffic was received from the California Department of Transportation during the NOP comment period. (Appendix A). The analysis contained in this section is based upon the following report prepared for the Project:

- *California Baptist Traffic Impact Analysis, California Baptist University Specific Plan Update.* Rick Engineering Company. September 2018 (EIR Appendix F).

4.16.1 Setting

Existing Circulation Network

Highways

Regional access to the CBU campus is near the State Route 91 freeway (SR-91), State Route 60 freeway (SR-60), and Interstate 215 (I-215). SR-91 is located just to the south of CBU and is a primary connection between Riverside and Orange/Los Angeles Counties. North of CBU is SR-60, which connects Riverside to Los Angeles in the west and the Coachella Valley in the east. North and east of CBU is I-215 that extends from Murrieta in the south to northern San Bernardino in the north. The SR-91/SR-60/I-215 freeway interchange is north of CBU.

Railways

The Metrolink and Amtrak stations are located east of the CBU campus in downtown Riverside and provide multimodal regional access to surrounding cities. The Perris Valley station is located northeast of CBU at Hunter Park/UCR. The five rail lines that extend through the City are the "Inland Empire–Orange County Line" that runs between San Bernardino and Oceanside, the "Orange County Line" that runs between Los Angeles to Oceanside, the "91 Line" that runs from Riverside to downtown Los Angeles via Fullerton and Orange County, and the "Riverside Line" that runs from Riverside to Los Angeles via Ontario and Pomona, and the "91/Perris Valley Line" that runs from the Riverside–Downtown Station to South Perris.

Street Network

As of 2017, the CBU campus had one main personnel/secure access on Magnolia Avenue, one secondary gated access within Lancer Plaza (accessed via Adams Street), and several emergency access points to/from the surrounding public streets. Streets surrounding the CBU campus core include Adams Street, Magnolia Avenue, Monroe Street, and Diana Avenue. The following is a brief description of the local roadways within the project area.

Adams Street. Adams Street is classified as an Arterial Street. Within the project area, it currently provides two vehicular travel lanes in each direction with raised and painted medians. The posted speed limit is 40 mph. On street parking is permitted alongside the northbound travel lanes only. Traffic signals are provided at its intersection with Garfield Street, Magnolia Avenue, Briarwood Drive, Indiana Avenue, Lincoln Avenue, and at both eastbound and westbound 91 Freeway ramps. Diana Avenue is stop controlled at its intersection with Adams Street.

Diana Avenue. Diana Avenue is classified as a Local Street. It is a two-way street with one lane in each direction. The posted speed limit is 40 mph and on-street parking is generally not allowed, except in areas directly adjacent to residential housing. Within the immediate project area, no traffic signals are in operation on Diana Avenue in the vicinity of the proposed project.

Campus View Drive. Campus View Drive is a local street that serves the campus exclusively. It runs through the campus with a signalized intersection at Magnolia Avenue. At its intersection with Diana Avenue, Campus Bridge Drive is stop controlled. The speed limit is 15 mph and there are speed bumps along the roadway.

Garfield Street. Garfield Street is classified as Local Street providing one travel lane in each direction. The street generally runs through residential areas. The posted speed limit is 25 mph and parking is allowed along both sides. Within the project study area, the intersection of Garfield Street and Adams Street is signalized.

Indiana Avenue. Indiana Avenue is classified as an Arterial Street. It currently provides 4 lanes of travel within the project area and runs parallel to the 91 Freeway. The posted speed limit is 40 mph. Parking is allowed along both sides of the street. The signalized intersection with Adams Street is included within the project study area.

The Riverside Transit Agency's (RTA's) Bus Route Number 14 serves Indiana Avenue, with stops within the project area. These stops are located near the intersections of Indiana Avenue, and Jefferson Street, Susan Street, Motor Circle South, Adams Street, Doyle Street, Bernard Street, Monroe Street, Amber Street, Arrowhead Street, and Jackson Street.

Jackson Street. Jackson Street is classified as an 88 foot Arterial Street. Within the project area, it currently provides two vehicular lanes of travel in each direction to the south of Magnolia and 4 vehicular lanes of traffic with a two way left turn lane to the north. The speed limit along Jackson is 40 mph with a 25 mph school zone located near the signalized intersection with Magnolia Avenue.

Jefferson Street. Jefferson Street is currently classified as a Collector Street with two vehicular lanes of travel. Jefferson generally serves residential areas with a posted speed limit is 35 mph.

The signalized intersection of Jefferson and Magnolia was analyzed as part of the project study area.

Lincoln Avenue. Lincoln Avenue is classified as an Arterial Street. It provides 4 lanes of travel, 2 in each direction with a two way left turn lane to the east of Adams Street. The posted speed limit is 45 mph. Its intersection with Adams Street is signalized and included as part of the analysis.

The RTA's Bus Route Number 10 serves Lincoln Avenue, with stops within the project area. These stops are located near the intersections of Lincoln Avenue and Jefferson Street, Lawrence Street, Adams Street, Gratton Street, Monroe Street, Irving Street, and Jackson Street.

Magnolia Avenue. Magnolia Avenue is classified as an Arterial Street. It is considered a Special Boulevard, Scenic Boulevard, and Parkway in the General Plan. Within the project area, it currently provides two vehicular travel lanes in each direction. The posted speed limit is 40 mph and on-street parking is prohibited. Bike lanes are found in both directions of travel. Traffic signals are provided at its intersection with Jackson Street, Overland Street, Monroe Street, Campus Bridge Drive, Adams Street, and Jefferson Street.

Magnolia Avenue is served by the RTA's Bus Route Number 1, with stops within the project area. These stops are located near the intersections of Magnolia Avenue and Jefferson Street, Canterbury Road, Crowell Avenue, Adams Street, Palm Drive, Melody Lane, Monroe Street, Overland Street, Sherman Drive, and Jackson Street. Service runs from approximately 4:00 a.m. to 10:45 p.m. with headways ranging from 15 to 30 minutes depending on the time of day. Magnolia Avenue is also by RTA's Rapidlink Gold Line between the Corona Transit Center and UCR, with stops in the project area at Adams Street. Separate buses are run eastbound and westbound, twice in the morning and twice in the evening. Magnolia Avenue is served by a separate bike lane.

Monroe Street. Monroe Street is classified as a Collector Street. It currently provides for one travel lane in each direction with a two way left turn lane. The speed limit is 40 mph with a 25 mph school zone within the project study area. On-street parking is not permitted along either side of Monroe. A traffic signal in provided at its intersection with Magnolia Avenue. Diana Avenue is stop controlled at its intersection with Monroe Street.

Overland Street. Overland Street is classified as a Local Street. Within the project area, it currently provides one vehicular travel lane in each direction. The posted speed limit is 25 mph. On street parking is permitted along both sides of the street. A traffic signal is provided at its intersection with Magnolia Avenue. This intersection also serves the entrance driveway to Chemawa Middle School.

Table 4.16.A describes the roads as defined in the City of Riverside General Plan 2025.

Table 4.16.A
Local Street Designations

Roadway	General Plan Designation	Cross Section
Magnolia Avenue (between Adams and Monroe Streets)	Arterial, Scenic Boulevard, Special Boulevard, and Parkway	132-foot cross section in front of CBU campus
Adams Street	Arterial	110-foot cross section
Monroe Street	Arterial	88-foot cross section
Diana Avenue	Local Street	50-foot cross section
Wilma Court and Emily Court	Local Cul-de-sac	60-foot cross section

Source: *California Baptist University Specific Plan*, Table 3-1 and City of Riverside, *City of Riverside General Plan 2025*.

Existing Operations

Intersections

Twelve signalized intersections and five unsignalized intersections were included in the traffic study area as presented in the Project traffic study. These intersections and their existing levels of service are listed in Table 4.16.B as follows.

Table 4.16.B
Existing and Existing Plus Project Intersection Levels of Service

Intersection ID	Intersection Location	Existing LOS		Existing Plus Project LOS		Significant Impact?
		A.M.	P.M.	A.M.	P.M.	
1	Adams Street/Garfield Street (Signalized)	B	A	B	A	No
2	Adams Street/Magnolia Avenue (Signalized)	D*	D*	D*	D*	No
3	Adams Street/Briarwood Drive (Signalized)	A	B	C	C	No
4	Adams Street/Plaza Driveway (Unsignalized) EB L/R NB L (Project to close intersection)	 D A	 C A	 B B	 C B	 No No No
5	Adams Street/Diana Avenue (Unsignalized) EB R WB R	 B C	 C B	 C C	 C C	 No

Table 4.16.B
Existing and Existing Plus Project Intersection Levels of Service

Intersection ID	Intersection Location	Existing LOS		Existing Plus Project LOS		Significant Impact?
		A.M.	P.M.	A.M.	P.M.	
6	Adams Street/SR 91 WB Ramps (Signalized)	D*	C	E*	C	**Yes**
7	Adams Street/SR 91 EB Ramps (Signalized)	C	E*	D	F*	**Yes**
8	Adams Street/Indiana Avenue (Signalized)	C*	C*	C*	C*	No
9	Adams Street/Lincoln Street (Signalized)	C	B	C	B	No
10	Magnolia Avenue/Jackson Street (Signalized)	C	D	C	D	No
11	Magnolia Avenue/Overland Street (Signalized)	A	A	A	A	No
12	Magnolia Avenue/Monroe Street (Signalized)	D*	D*	D*	D*	No
13	Magnolia Avenue/Campus View (Signalized) (Main entrance shifts to Adams Street)	B*	B*	A	A	No
14	Magnolia Street/Jefferson Avenue (Signalized)	C	C	C	C	No
15	Diana Avenue/Monroe Street (Unsignalized) EB L/T/R WB L/T/R NB L/T/R SB L/T/R	 A C A A	 A D A A	 A NA NA NA	 A NA NA NA	No
16	Diana Avenue/Campus View (Unsignalized) EB L/T SB L/R	 A B	 A B	 NA NA	 NA NA	No
17	Diana Avenue/Plaza Driveway (Unsignalized) EB L/T SB L/R	 A A	 A A	 NA NA	 NA NA	No

*Queue exceeds storage length for at least one turn movement.

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

As shown in Table 4.16.B, one study area intersection is currently operating at below the level of service standard (LOS D) during peak hours. This intersection is:

- Adams Street/SR-91 EB Ramps – LOS E during the PM peak hour.

In addition, Table 4.16.B identifies intersections that currently have at least one turn movement queue that exceeds the existing pocket length. These intersections include:

- Adams Street/Magnolia Avenue; AM and PM peak hours;
- Adams Street/SR-91 WB Ramps – AM peak hour;
- Adams Street/SR-91 EB Ramps – PM peak hour;
- Adams Street/Indiana Avenue – AM and PM peak hours;
- Magnolia Avenue/Monroe Street – AM and PM peak hours; and
- Magnolia Avenue/Campus View – AM and PM peak hours.

Roadway Segments

Nineteen roadway segments were included in the traffic study area as presented in the Project traffic study. These roadway segments are listed in Table 4.16.C.

Table 4.16.C
Existing and Existing Plus Project Roadway Segment Operations

Roadway Segment[1]	Roadway Classification	LOS D Capacity	No. of Lanes	Existing		Existing Plus Project LOS	
				ADT	LOS	ADT	LOS
Monroe Street							
b/w Garfield St & Magnolia Ave	Collector	12,499	2	10,129	C	10,993	C
b/w Magnolia Ave and Diana Ave	Arterial	17,499	2	8,983	<C	9,847	<C
b/w Diana Ave and Indiana Ave	Arterial	17,499	2	9,212	<C	10,076	C
Magnolia Avenue							
b/w Jefferson St and Adams St	Special Blvd*	32,999	4	27,045	C	28,773	C
b/w Adams St and Campus View	Special Blvd*	32,999	4	27,104	C	28,832	C
b/w Campus View and Monroe St	Special Blvd*	32,999	4	24,089	<C	27,545	C
b/w Monroe St and Overland St	Special Blvd*	32,999	4	24,128	<C	25,856	<C
b/w Overland St and Jackson St	Special Blvd*	32,999	4	25,078	<C	26,806	C
Adams Street							
b/w California Ave and Garfield St	Arterial	32,999	4	18,945	<C	20,327	<C
b/w Garfield St and Magnolia Ave	Arterial	32,999	4	20,172	<C	21,900	<C
b/w Magnolia Ave and Briarwood Dr	Arterial	32,999	4	28,449	C	30,177	D
b/w Briarwood Dr and Diana Ave	Arterial	32,999	4	27,957	C	38,325	E

Table 4.16.C
Existing and Existing Plus Project Roadway Segment Operations

Roadway Segment[1]	Roadway Classification	LOS D Capacity	No. of Lanes	Existing		Existing Plus Project LOS	
				ADT	LOS	ADT	LOS
with improvements	Arterial	41,249	5	27,957	<C	38,325	D
b/w SR-91 WB and SR-91 EB Ramps	Arterial	32,999	4	27,939	C	33,887	E
b/w SR-91 EB Ramp and Indiana Ave	Arterial	32,999	4	27,074	C	28,802	C
b/w Indiana Ave and Lincoln Ave	Arterial	32,999	4	14,926	<C	16,654	<C
Diana Avenue							
b/w Adams St and Campus View	Collector	12,499	2	3,522	<C	NA	NA
b/w Campus View and Monroe St	Collector	17,499	2	2,689	<C	NA	NA

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.
*Magnolia Avenue classified per City of Riverside Master Plan of Roadways and Magnolia Avenue Specific Plan.

As shown in Table 4.16.C, all of the study area roadway segments currently operate at LOS D or better.

Freeway Ramp Merge/Diverge Locations

Four freeway merge/diverge locations at the SR-91/Adams Street eastbound and westbound on and off-ramps were included in the traffic study area as presented in the Project traffic study. These merge/diverge locations are listed in Table 4.16.D.

Table 4.16.D
Existing Ramp Merge/Diverge Analysis

Ramp	Existing				Existing Plus Project			
	A.M.		P.M.		A.M.		P.M.	
	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
SR 91 Westbound Off-ramp at Adams Street	11.3	B	12.3	B	12.9	B	12.2	B
SR 91 Westbound On-ramp at Adams Street	19.6	B	9.2	A	21.3	B	22.8	C
SR 91 Eastbound Off-ramp at Adams Street	10.9	B	12.2	B	11.6	B	12.8	B
SR 91 Eastbound On-ramp at Adams Street	36.5	E	39.4	E	37.4	E	40.5	E

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

As shown in Table 4.16.D, all of the study area ramp merge/diverge locations currently operate at LOS C or better with the exception of LOS E during the AM and PM peak hours at the SR 91 Eastbound On-ramp at Adams Street.

4.16.2 Related Regulations

Federal Regulations

There are no relevant federal regulations related to transportation and traffic applicable to the proposed project.

State Regulations

California Department of Transportation

As determined by the California Department of Transportation (Caltrans), the LOS for operating State highway facilities is based upon measures of effectiveness (MOEs). These MOEs describe the measures best suited for analyzing State highway facilities (i.e., freeway segments, signalized intersections, on- or off-ramps, etc.). Caltrans endeavors to maintain a target LOS at the transition between LOS "C" and LOS "D" on State highway facilities. However, Caltrans acknowledges that this may not always be feasible and recommends that the lead agency consult with Caltrans to determine the appropriate target LOS. If an existing State highway facility is operating at less than the appropriate target LOS, the existing MOE should be maintained. In general, the region-wide goal for an acceptable LOS on all freeways, roadway segments, and intersections is "D."

Regional Regulations

Congestion Management Program

Riverside County Transportation Commission (RCTC) is designated as the Congestion Management Agency (CMA) to oversee the Congestion Management Program (CMP) (GP 2025, p. CCM-7). RCTC approved a modification of the CMP Land Use Coordination Element that included the elimination of the Traffic Impact Assessment report process and replaced it with an Enhanced Traffic Monitoring System. Prior to this modification of the CMP, a Traffic Impact Assessment had to be prepared consistent with the CMP/Local Agency Guidelines whenever a proposed development generated greater than 200 peak hour trips. However, as of July 1, 1997, assessing these impacts consistent with the CMP guidelines is no longer required by RCTC. Therefore, although the City's Environmental Checklist includes a reference to CMA LOS, for the purposes of this analysis, the GP 2025 will be used as the guiding document for acceptable LOS, against which impacts are measured.

Western Riverside County Transportation Uniform Mitigation Fee

In 2002, the jurisdictions of western Riverside County, including the City, agreed to participate in the Western Riverside County Transportation Uniform Mitigation Fee (TUMF) program. TUMF is a multi-jurisdictional impact fee program administered by the Western Riverside Council of Governments (WRCOG) that funds transportation improvements on a regional and

sub-regional basis associated with new growth. All new development in each of the participating jurisdictions is subject to TUMF, based on the proposed intensity and type of development.

TUMF fees are submitted to the City by the applicant and are passed on to WRCOG as the ultimate program administrator. TUMF funds are distributed on a formula basis to the regional, local, and transit components of the program. Of the TUMF funds received by WRCOG, 1.64 percent is allocated to RTA for making regional transit improvements, 46.39 percent is allocated to RCTC for programming improvements to the arterials of regional significance on the Regional System of Highways and Arterials (RSHA), 46.39 percent is allocated to the five zones for programming improvements to the Regional System of Highways and Arterials (RSHA) as determined by the respective zone committees and 1.59% is allocated to the RCA to purchase habitat for the MSHCP, to mitigate the impacts of TUMF construction projects. (WRCOG, p. 5).

RSHA is the system of roadways that serve inter-community trips within western Riverside County and therefore are eligible for improvement funding with TUMF funds (TUMF Nexus 2009, p. 16). RSHA for western Riverside County was identified based on several transportation network and performance guidelines as follows:

- Arterial highway facilities proposed to have a minimum of four lanes at ultimate buildout (not including freeways);
- Facilities that serve multiple jurisdictions and/or provide connectivity between communities both within and adjoining western Riverside County;
- Facilities with forecast traffic volumes in excess of 20,000 vehicles per day by 2035;
- Facilities with forecast volume to capacity ratio of 0.90 (LOS E) or greater in 2035; and
- Facilities that accommodate regional fixed route transit services;
- Facilities that provide direct access to major commercial, industrial, institutional, recreational, or tourist activity centers, and multi-modal transportation facilities (such as airports, railway terminals, and transit centers) (TUMF Nexus 2009, p. 16).

Specific transportation improvement projects are identified by WRCOG's Public Works Committee, which is responsible for developing objective criteria for project selection and prioritization including, but not limited to, the following factors: traffic safety issues potentially created by growth, regional significance, availability of matching funds, mitigation of congestion created by new development, system continuity, geographic balance, project readiness, and completed projects with reimbursement agreements. Recommendations of the Public Works Committee are then submitted to WRCOG's Technical Advisory Committee, which are then submitted to WRCOG's Executive Committee. The Executive Committee is responsible for reviewing and acting on recommendations for project selection and prioritization of the

Regionally Significant Arterials, 10-year Strategic Plan, and the Transportation Improvement Program.

The WRCOG Executive Committee adopted the Western Riverside County Transportation Uniform Fee Nexus Study, 2016 Update, on July 10, 2017. On October 10, 2017, the City Council adopted Ordinance No. 7393 and adopted the 2016 Nexus Study TUMF fees.

Improvement projects identified within the TUMF program include Adams Street from Arlington Avenue to SR-91 and from SR-91 to Lincoln Avenue, and the Adams Street/SR-91 interchange (TUMF Network Detailed Cost Estimate, p. 5). A recorded Covenant and Agreement stating that CBU's properties will remain in use by a Private University will be accepted in lieu of TUMF fee payments.

Local Regulations

City of Riverside General Plan 2025

The City of Riverside addresses traffic in the Circulation and Community Mobility Element of the General Plan. The goals and policies in the Circulation and Community Mobility Element aim to minimize traffic levels, maintain an LOS D or better, enhance mobility, encourage the use of telecommunications, and encourage alternative transportation. The following objectives and policies have been referenced from the City's General Plan which relate to the proposed project. Although listed here, each of these objectives and policies are also presented in Table 4.10-1 in the Land Use and Planning Section of this EIR with an evaluation of the Project's consistency with the stated objectives and policies.

Objective CCM-2: Build and maintain a transportation system that combines a mix of transportation modes and transportation system management techniques, and that is designed to meet the needs of Riverside's residents and businesses, while minimizing the transportation system's impacts on air quality, the environment and adjacent development.

Policy CCM-2.2 Balance the need for free traffic flow with economic realities and environmental and aesthetic considerations, such that streets are designed to handle normal traffic flows with tolerances to allow for potential short-term delays at peak-flow hours.

Policy CCM-2.3 Maintain LOS D or better on Arterial Streets wherever possible. At key locations, such as City Arterials that are used by regional freeway bypass traffic and at heavily traveled freeway interchanges, allow LOS E at peak hours as the acceptable standard on a case-by-case basis.

Policy CCM-2.4	Minimize the occurrence of streets operating at LOS F by building out the planned street network and by integrating land use and transportation in accordance with the General Plan principles.
Policy CCM-2.7	Limit driveway and local street access on Arterial Streets to maintain a desired quality of traffic flow. Wherever possible, consolidate driveways and implement access controls during redevelopment of adjacent parcels.
Policy CCM-2.8	Design street improvements considering the effect on aesthetic character and livability of residential neighborhoods, along with traffic engineering criteria.
Policy CCM-2.9	Design all street improvement projects in a comprehensive fashion to include consideration of street trees, pedestrian walkways, bicycle lanes, equestrian pathways, signing, lighting, noise and air quality wherever any of these factors are applicable.
Policy CCM-2.10	Emphasize the landscaping of parkways and boulevards.
Objective CCM-3:	Design the Magnolia Avenue/Market Street Corridor as a transit- and pedestrian-oriented Mixed Use boulevard.
Policy CCM-3.2	Consider the implementation of off-street shared parking with parking signage improvements, consolidation of driveways, installation of raised landscaped medians, bus turnouts, traffic signal enhancements, special pavement treatments at pedestrian crossings and intersections, curb extensions, signalized/enhanced crosswalks, wider sidewalks and other appropriate measures which enhance traffic flow, transit efficiency and pedestrian movements.
Policy CCM-3.3	Upgrade and improve bottlenecks at key intersections (as determined based on need) via the addition of turn-out lanes, with transition back to the original number of lanes at the mid-block as feasible. This can be accomplished using transportation funds, including developer fees, TUMF funds, grants and CIP funding.
Policy CCM-3.4	Seek opportunities to enhance mobility on parallel and connecting Arterial and Collector Streets in the Magnolia/Market corridor to relieve congestion and to allow for implementation of the mixed-use corridor plan. These could include changes to traffic control (stop signs and traffic signals), elimination of cross-gutters, parking removal, driveway consolidation or limited roadway widening where feasible.
Policy CCM-3.5	Apply neighborhood traffic control measures as warranted on the parallel local residential streets to limit cut-through, non-local traffic.

Objective CCM-6:	Cooperate in the implementation of regional and inter-jurisdictional transportation plans and improvements to the regional transportation system.
Objective CCM-9:	Promote and support an efficient public multi-modal transportation network that connects activity centers in Riverside to each other and to the region.
Policy CCM-9.1	Encourage increased use of public transportation and multi-modal transportation as means of reducing roadway congestion, air pollution and non-point source water pollution, through such techniques as directing new growth along transportation corridors.
Policy CCM-9.5	Incorporate facilities for transit and other alternative modes of transportation, such as park-and-ride lots and bus turnouts, in the design of future developments.
Policy CCM-9.6	Enhance and encourage the provision of attractive and appropriate transit amenities, including shaded bus stops, to facilitate use of public transportation, through the development process by incorporating the necessary design features as appropriate.
Policy CCM-9.7	Ensure adequate connections among all alternative modes.
Policy CCM-9.8	Preserve options for future transit use where appropriate when designing improvements for roadways.
Objective CCM-10:	Provide an extensive and regionally linked public bicycle, pedestrian and equestrian trails system.
Policy CCM-10.1	Ensure the provision of bicycle facilities consistent with the Bicycle Master Plan.
Policy CCM-10.2	Incorporate bicycle and pedestrian trails and bicycle racks in future development projects.
Policy CCM-10.3	Provide properly designed pedestrian facilities for the disabled and senior population to ensure their safety and enhanced mobility as users of streets, roads and highways emphasizing “complete streets” principles.
Policy CCM-10.6	Encourage pedestrian travel through the creation of sidewalks and street crossings.
Policy CCM-10.7	Maintain an extensive trails network that supports bicycles, pedestrians and horses and is linked to the trails systems of adjacent jurisdictions.

Policy CCM-10.8 Maximize links between trails and major activity centers, residential neighborhoods, schools, shopping centers and employment centers.

Policy CCM-10.12 Encourage bicycling as a commute mode to school, work, etc.

Public Safety Element

Objective PS-5: Provide safe pedestrian and bicyclist environments Citywide

Policy PS-5.1 Enhance and maintain pedestrian safety through the inclusion of well-designed streets, sidewalks, crosswalks, traffic control devices and school routes throughout the City. Reasonable means of pedestrian accessibility shall be an important consideration in the approval of new development.

Policy PS-5.2 Develop objectives and detailed standards and guidelines for the treatment of public streetscapes to improve safety and walkability. Recommendations should address street trees, street lighting, street furniture, traffic calming and other pertinent issues. Establish funding sources and priorities and set forth a phased improvement program.

City of Riverside Traffic Signal and Railroad Signal Mitigation Fees and Transportation Impact Fee Program

The City's local development impact fee (DIF) related to transportation improvements is set forth in Chapter 16.64 of the Riverside Municipal Code. This DIF is comprised of two fees: the traffic signal and railroad signal mitigation fee and the transportation impact fee, which together address local transportation needs throughout the City. In creating these fees, the City Council determined that new private development in the City increases the amount of traffic utilizing the City street system. This increased traffic requires the installation of additional traffic signals, railroad signals including crossing gates and associated work and street improvements at specific locations to increase or improve transportation capacity. In order to protect health, safety and welfare of the general public, the City determined that new private development should pay its fair share towards needed improvements. The traffic signal and railroad signal mitigation fee is imposed on the construction of all new nonresidential units, dwelling units, and mobile home spaces upon application for a building permit. Funds collected through payment of this fee shall be used solely for the installation of additional traffic signals and railroad signals including crossing gates and other protective devices, and all costs associated with railroad crossing protection, including, but not limited to planking, sidewalks, and curbs and gutters. (RMC, Sections 16.64.010, 16.64.030, 16.64.050) The proposed Project will pay the traffic signal and railroad signal mitigation fees, currently set at $0.25 per square foot of building area.

Funds collected through payment of the transportation impact fee shall be expended solely for construction of street improvements as designated by the City Council to increase or improve the transportation capacity of the designated streets. This fee is imposed on the construction of new dwelling units and mobile home spaces upon application for a building permit. (RMC Sections 16.64.040, 16.64.060) Because the proposed Project does not include buildings that will be used for residential occupancy it is not subject to the transportation impact fee component (RMC Chapter 16.64).

The City is responsible for maintaining, administering, and updating the DIF program as appropriate. The City's DIF's were lasted updated as of January 26, 2018, and there are no immediate plans to update the transportation related DIF fees.

City of Riverside Neighborhood Traffic Management Program

As traffic volumes and congestion have increased on the major regional roadways, drivers looking to reduce their travel times begin to look at alternative routes using the local street system to avoid problem areas. This neighborhood intrusion by "cut-through" traffic has become a growing concern for some residential areas. The City has an active Neighborhood Traffic Management Program to minimize and/or prevent intrusion of regional cut-through traffic into residential neighborhoods through traffic management and traffic calming strategies, and to improve the livability of neighborhoods through controlling the impacts of outside traffic. The strategies include speed control methods, parking restrictions, pedestrian safety improvements, and sight obstruction elimination. (GP 2025, p. CCM-22)

4.16.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G in the CEQA Guidelines and the City's Traffic Impact Analysis preparation guidelines, the proposed Project would have a significant impact on transportation and traffic if the proposed Project:

- (Threshold A) Conflicts with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit;
- (Threshold B) Conflicts with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;

- (Threshold C) Results in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
- (Threshold D) Substantially increases hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
- (Threshold E) Results in inadequate emergency access; or
- (Threshold F) Conflicts with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise cause a decrease in the performance or safety of such facilities.

Methodology

The project-specific Traffic Impact Analysis (TIA) analyzed Project impacts associated with intersection levels of service, roadway levels of service, intersection queuing, and ramp merge/diverge levels of service for the following scenarios:

- Existing Conditions (Year 2016)
- Existing plus Ambient Conditions (Year 2025)
- Existing plus Ambient plus Cumulative Conditions (Year 2025)
- General Plan Buildout Conditions (Year 2025)

The Existing plus Ambient scenario is essentially a building block for the Existing plus Ambient plus Cumulative near term cumulative scenario and is therefore not reported in this EIR. For this reason, this section herein analyzes Project impacts associated with the following baseline (existing), near term cumulative, and long term cumulative scenarios:

- Baseline: Existing Conditions (Year 2016);
- Near Term Cumulative: Existing plus Ambient plus Cumulative Conditions (Year 2025); and
- Long Term Cumulative: General Plan Buildout (Year 2025).

Level of Service. The level of service for signalized intersections was calculated using the HCM Operational Method. Roadway operations and the relationship between capacity and traffic volumes are generally expressed in terms of LOS, which is defined using the letter grades A through F and reflect the reality that conditions rapidly deteriorate as traffic approaches the absolute capacity of the roadway facility. Under such conditions, congestion is experienced. There is general instability in the traffic flow, which means that relatively small incidents (e.g., momentary engine stall) can cause considerable fluctuations in speeds and delays. This near-capacity situation is labeled LOS E. Beyond LOS E, capacity has been exceeded, and arriving traffic will exceed the ability of the intersection to accommodate it.

LOS analysis was conducted to determine whether there is adequate performance at each of the study intersections. Table 4.16.E identifies the level of service criteria for unsignalized and signalized intersection analysis.

Table 4.16.E
Level of Service Criteria, Unsignalized and Signalized Intersections

Level of Service	Unsignalized Intersection Average Delay per Vehicle (sec.)	Signalized Intersection Average Delay per Vehicle (sec.)
A	$\leq$ 10	$\leq$ 10
B	> 10 and $\leq$ 15	> 10 and $\leq$ 20
C	> 15 and $\leq$ 25	> 20 and $\leq$ 35
D	> 25 and $\leq$ 35	> 35 and $\leq$ 55
E	> 35 and $\leq$ 50	> 55 and $\leq$ 80
F	> 50	> 80

The City of General Plan allows LOS D to be used as the maximum acceptable threshold for study intersections and roadways of Collector or higher classification, or to any local or collector street that provides access for the project. LOS C is to be maintained on all local street intersections. At key locations, such as City Arterial roadways used as freeway bypasses by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis. The City also recognizes that along key freeway-feeder segments during peak commute hours, LOS F may be expected due to regional travel patterns. Projects that include a General Plan Amendment, a significant impact at a study intersection would occur when the addition of project-related trips either causes peak hour LOS to degrade from acceptable (LOS A through D) to unacceptable levels (LOS E or F) or causes the peak hour delay to increase as shown in Table 4.16.F.

Table 4.16.F
Signalized Intersection Impact Significance

Level of Service	Signalized Intersection Average Delay per Vehicle (sec.)
A/B	10.0 seconds
C	8.0 seconds
D	5.0 seconds
D	2.0 seconds
F	1.0 second

The majority of study area intersections fall under the jurisdiction of the City. However, the SR-91 freeway on-ramp and off-ramp intersections at Adams Street are under the jurisdiction of Caltrans. The LOS standard for intersections under the jurisdiction of the City is D on arterials, and LOS C for non-arterials. For intersections under the jurisdiction of Caltrans, the standard is

between LOS C and LOS D (i.e., delay of 45 seconds at signalized intersections and delay of 30 seconds at unsignalized intersections).

LOS analysis was conducted to determine whether there is adequate performance at each of the study roadways. The level of service criteria for the roadway segment analysis was based on the City's Roadway Capacity Exhibit D.

The roadway segments fall under the jurisdiction of the City. The LOS standard for roadways under the jurisdiction of the City is LOS D.

The analysis of freeway operations also used LOS thresholds. The freeway merge/diverge analysis was based on the HCM 2010 Ramps and Ramp Junctions analysis method and performed using HCS2010 software. Density was calculated in terms of passenger cars per mile per lane. Freeway merge/diverge LOS criteria are defined in Table 4.16.G.

Table 4.16.G
LOS Criteria, Ramps and Ramp Junctions

LOS	Density (pc/mi/ln)
A	≤ 10
B	> 10–20
C	> 20–28
D	> 28–35
E	> 35
F	Demand exceeds capacity

Based on Caltrans traffic study guidelines, between LOS C and LOS D is considered to be the limit of acceptable traffic operations during the peak hour at freeway segments and future merge/diverge ramp junctions. However, for freeway segments and ramp merge/diverge areas, the Caltrans guidelines recognize that the transition between LOS C and D may not be feasible and allows the local jurisdictions to set the LOS threshold. As a result, most jurisdictions in require LOS E, which is in accordance with Riverside County Congestion Management Plan (CMP) guidelines. Therefore, LOS E is used as the LOS standard for freeway ramp merge/ diverge areas.

4.16.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through the design. The Project proposes a plan for internal circulation improvements for the benefit of multiple modes of travel including vehicular, pedestrian, and biking. In addition, the proposed Project includes the following Project design features with regard to site access and offsite roadway/ intersection improvements:

- Adams Street/Plaza Driveway – Intersection to be closed.

- Adams Street/Lancer Lane-Briarwood Drive intersection – To become the main access point to the campus. Lancer Lane will have 2 inbound lanes and 3 outbound lanes (one shared left thru lane and two exclusive right turn lanes). The NB approach of Adams Street will be widened to include a second left turn lane with 250 foot long pocket length.
- Adams Street – To be widened. CBU to dedicate and construct the Project's Adams Street frontage to a 6-lane Arterial with 120 feet of right-of-way, to include 3 travel lanes in the southbound direction and 2 travel lanes in the northbound direction between Briarwood Drive and the SR-91 Westbound Ramps and maintain the existing 2 travel lanes in the northbound and southbound direction from Briarwood Drive to Magnolia Avenue.
- Monroe Street – To be widened. CBU to dedicate and construct the Project's Monroe Street frontage to a 4 lane Arterial with 88 feet of right-of-way, to include 2 travel lanes in the northbound direction. These improvements are required as part of the Subdivision Map Act, and would be installed as part of future project's that front Monroe Street.

4.16.5 Environmental Impacts Before Mitigation

Threshold A and B: Conflict with Applicable Circulation Plan and Traffic and Level of Service Impacts – Existing plus Project Operations.

The study prepared for the proposed Project evaluated potential traffic impacts due to the proposed expansion of California Baptist University to 12,000 students by year 2025. In year 2025, the entire CBU Campus is anticipated to generate 17,280 average daily trips (ADT) with 1,080 AM peak hour trips (907 inbound/173 outbound) and 1,320 PM peak hour trips (647 inbound/673 outbound). This represents an increase of 5,291 daily trips, 349 AM peak hour trips (293 inbound/56 outbound) and 589 PM peak hour trips (289 inbound/300 outbound) in comparison to the existing trips. The 5,291 daily trips, 349 AM peak hour trips, and 589 PM peak hour trips represents the trip generation estimate for the proposed Project.[1]

Intersections

Existing plus Project levels of service at study intersection are identified in previously referenced Table 4.16.B. As shown in Table 4.16.B, two study area intersections are forecast to operate at below the LOS D standard during the AM and/or PM peak hour with the addition of Project traffic to existing. These intersections include:

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

[1] *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

The Project contributes to a LOS reduction at these intersections which is considered to be a significant impact and mitigation is required. The existing plus Project traffic analysis assumed improvements to the Adams Street/Briarwood Drive (Lancer Lane) intersection. **Mitigation Measure TRA-1** requires the improvements to the Adams Street/Briarwood Drive (Lancer Lane) intersection. Traffic impacts at these intersections would be **less than significant with mitigation incorporated.**

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

Table 4.16.B also identifies five intersections that are forecast to have at least one turn movement queue that exceeds the existing pocket length in the Existing plus Project condition. These intersections include:

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

The Project creates or contributes to the queue length exceedances at these intersections which is considered to be a significant impact and mitigation is required. The Adams Street 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/Magnolia Avenue and Magnolia Avenue/Monroe Street intersections would be mitigated by implementing the restriping and center median modifications described in **Mitigation Measure TRA-2** (Adams Street/Magnolia Avenue) and **Mitigation Measure TRA-3** (Magnolia Avenue/Monroe Street). With implementation of these measures, queueing related impacts at these intersections would be **less than significant with mitigation incorporated.**

Roadway Segments

Previously referenced Table 4.16.C shows all of the study area roadway segments are forecast to operate at LOS D or better in the Existing plus Project traffic analysis. This is considered to be a **less than significant impact** and no mitigation is required.

Freeway Ramp Merge/Diverge Locations

As shown in previously referenced Table 4.16.D, the study area freeway merge/diverge locations currently operate at LOS B or better with Existing plus Project with the exception of LOS E during the AM and PM peak hours at the SR 91 Eastbound On-ramp at Adams Street. Although this location is operating at LOS E during peak hours in the existing condition, the addition of Project traffic will add 0.1 pc/mi/ln density to the freeway segment operating at an unacceptable LOS. This is considered to be a significant impact and mitigation is required.

To improve operations at this freeway segment, capacity-enhancing freeway mainline lanes improvements would be required. These freeway facilities are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is available. Although the SR-91/Adams Street PSR may lead to auxiliary or mainline lane improvements near that Adams Street interchange that might improve merge/diverge LOS, the specific design of the improvements has not taken place. Since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither the City nor the Project proponent can contribute fair share fees or implement the required improvements. This impact is therefore considered to be **significant and unavoidable**.

Threshold A and B: Conflict with Applicable Circulation Plan and Traffic and Level of Service Impacts – Existing plus Ambient plus Cumulative plus Project Operations.

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

Intersections

Implementation of the project-specific improvements defined in **Mitigation Measures TRA-1** through **TRA-3** were assumed to be in place in the Existing plus Ambient plus Cumulative plus Project level of service analysis. Existing plus Ambient plus Cumulative plus Project levels of service at study intersections are identified in Table 4.16.H. As shown in Table 4.16.H, two

study area intersections are forecast to operate at LOS E or worse during the AM and/or PM peak hour. These intersections include:

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

Table 4.16.H
Existing Plus Ambient Plus Cumulative Plus Project Intersection Levels of Service

Intersection ID	Intersection Location	Existing Plus Ambient Plus Cumulative LOS		Existing Plus Ambient Plus Cumulative Plus Project LOS		Significant Impact?
		A.M.	P.M.	A.M.	P.M.	
1	Adams Street/Garfield Street (Signalized)	B*	A	B*	A	No
2	Adams Street/Magnolia Avenue (Signalized) With mitigation (add EBR)	D	D	D	E	No
3	Adams Street/Briarwood Drive (Signalized)	B	B	C	C	No
4	Adams Street/Plaza Driveway (Unsignalized) (Project to close intersection)	N/A	N/A	N/A	N/A	No
5	Adams Street/Diana Avenue (Unsignalized)					
	EB R	N/A	N/A	N/A	N/A	No
	WB R	C	C	C	C	No
6	Adams Street/SR 91 WB Ramps (Signalized)	E*	D	E*	D	**Yes**
7	Adams Street/SR 91 EB Ramps (Signalized)	D*	F*	D*	F*	**Yes**
8	Adams Street/Indiana Avenue (Signalized)	C*	C*	C*	C*	No
9	Adams Street/Lincoln Street (Signalized)	C	B	C	B	No
10	Magnolia Avenue/Jackson Street (Signalized)	C	D	C	D	No
11	Magnolia Avenue/Overland Street (Signalized)	A	A	A	A	No
12	Magnolia Avenue/Monroe Street (Signalized)	D	D	D	D	No
13	Magnolia Avenue/Campus View (Signalized)	A	A	A	A	No
14	Magnolia Street/Jefferson Avenue (Signalized)	C	C*	C	C*	No
15	Diana Avenue/Monroe Street (Unsignalized)					
	EB L/T/R	C	C	C	C	No
	WB L/T/R	N/A	N/A	N/A	N/A	N/A
	NB L/T/R	A	A	A	A	No
	SB L/T/R	A	A	A	A	No
16	Diana Avenue/Campus View (Unsignalized)	N/A	N/A	N/A	N/A	No
17	Diana Avenue/Plaza Driveway (Unsignalized)	N/A	N/A	N/A	N/A	No

*Queue exceeds storage length for at least one turn movement.
Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

The existing plus ambient plus cumulative plus Project traffic analysis assumed the addition of an exclusive eastbound right turn lane at the Adams Street/Magnolia Avenue intersection. **Mitigation Measure TRA-4** requires payment of a fair share contribution towards the construction of an exclusive eastbound right turn lane at the Adams Street/Magnolia Avenue intersection e. Traffic related impacts at thise intersection would be **less than significant with mitigation incorporated**.

The Project contributes to a LOS reduction at the Adams Street/SR-91 Westbound ramp and Adams Street/SR-91 Eastbound ramp intersections. This is considered to be a significant cumulative impact and mitigation is required. To operate at a satisfactory LOS, improvements to the Adams Street/SR-91 EB and WB Ramps such as those being studied as part of the SR-91/Adams Street PSR would be required. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons Project impacts are considered **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans.

Table 4.16.H also identifies five intersections that are forecast to have at least one turn movement queue that exceeds the existing pocket length in the Existing plus Project condition. 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 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.**

Roadway Segments

Table 4.16.I 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.

Table 4.16.I
Existing Plus Ambient Plus Cumulative Plus Project Roadway Segment Operations

Roadway Segment[1]	Roadway Classification	LOS D Capacity	No. of Lanes	Existing Plus Ambient Plus Cumulative		Existing Plus Ambient Plus Cumulative Plus Project LOS	
				ADT	LOS	ADT	LOS
Monroe Street							
b/w Garfield St & Magnolia Ave	Collector	12,499	2	11,430	D	10,484	D
b/w Magnolia Ave and Diana Ave	Arterial	17,499	2	10,181	<C	10,225	<C
b/w Diana Ave and Indiana Ave	Arterial	17,499	2	10,430	<C	10,441	<C
Magnolia Avenue							
b/w Jefferson St and Adams St	Special Blvd*	32,999	4	30,256	D	30,557	D
b/w Adams St and Campus View	Special Blvd*	32,999	4	30,320	D	30,618	D
b/w Campus View and Monroe St	Special Blvd*	32,999	4	27,812	C	28,110	C
b/w Monroe St and Overland St	Special Blvd*	32,999	4	27,077	C	27,367	C
b/w Overland St and Jackson St	Special Blvd*	32,999	4	28,112	C	28,402	C
Adams Street							
b/w California Ave and Garfield St	Arterial	32,999	4	21,272	<C	21,426	<C
b/w Garfield St and Magnolia Ave	Arterial	32,999	4	22,765	<C	22,890	<C
b/w Magnolia Ave and Briarwood Dr	Arterial	32,999	4	31,009	D	31,132	D
b/w Briarwood Dr and Diana Ave	Arterial	32,999	4	35,139	E	35,326	E
b/w SR-91 WB and SR-91 EB Ramps	Arterial	32,999	4	33,176	E	33,419	E
b/w SR-91 EB Ramp and Indiana Ave	Arterial	32,999	4	30,288	D	30,579	D
b/w Indiana Ave and Lincoln Ave	Arterial	32,999	4	17,046	<C	17,283	<C

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.
*Magnolia Avenue classified per City of Riverside Master Plan of Roadways and Magnolia Avenue Specific Plan.

The Project contributes to the level of service standard deficiency at these roadway segments. 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**.

For the segment of roadway on Adams Street between the SR-91 WB and EB Ramps, widening of Adams Street would be required. Although the SR-91/Adams Street PSR may lead to widening of Adams Street, the specific design of the improvements has not taken place. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons Project impacts are considered **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans.

Freeway Ramp Merge/Diverge Locations

Table 4.16.J shows that the study area freeway merge/diverge locations are forecast to operate at LOS C or better in the Existing plus Ambient plus Cumulative plus Project analysis with the exception of LOS F during the AM and PM peak hours at the SR 91 Eastbound On-ramp at Adams Street.

Table 4.16.J
Existing Plus Ambient Plus Cumulative Plus Project Ramp Merge/Diverge Analysis

Ramp	Existing				Existing Plus Project			
	A.M.		P.M.		A.M.		P.M.	
	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
SR 91 Westbound Off-ramp at Adams Street	11.3	B	12.3	B	12.9	B	12.2	B
SR 91 Westbound On-ramp at Adams Street	19.6	B	9.2	A	21.3	B	22.8	C
SR 91 Eastbound Off-ramp at Adams Street	10.9	B	12.2	B	11.6	B	12.8	B
SR 91 Eastbound On-ramp at Adams Street	36.5	E	39.4	E	37.4	E	40.5	E

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

Although the SR 91 Eastbound On-ramp at Adams Street is forecast to operate at LOS F during peak hours in the pre-Project condition (i.e., Existing plus Ambient plus Cumulative), the addition of Project traffic will add 1.8 pc/mi/ln density during the PM peak hour to the freeway

segment. This is considered to be a significant impact and mitigation is required. To improve operations at this freeway segment, capacity-enhancing freeway mainline lanes improvements would be required. These freeway facilities are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is available. Although the SR-91/Adams Street PSR may lead to auxiliary or mainline lane improvements near that Adams Street interchange that might improve merge/diverge LOS, the specific design of the improvements has not taken place. Since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither the City nor the Project proponent can contribute fair share fees or implement the required improvements. This impact is therefore considered to be **significant and unavoidable**.

Threshold A and B: Conflict with Applicable Circulation Plan and Traffic and Level of Service Impacts – General Plan Buildout plus Project Operations.

Buildout daily traffic volumes for the City of Riverside's General Plan 2025 Buildout (Year 2025) were obtained from the County of Riverside's RivTam model (Year 2035). The RivTAM model was utilized within this study for the City's buildout year of 2025, as it was updated in the year 2016 by Urban Crossroads. The buildout traffic volumes can be viewed in Appendix H of the TIA. These daily buildout volumes, along with existing segment volumes and existing turning movement counts, were utilized to determine buildout turning movement volumes.

In addition, the City's Master Plan of Roadways and the Magnolia Avenue Specific Plan were utilized to determine the General Plan Buildout condition number of travel lanes and intersection geometry.[2]

Intersections

General Plan Buildout plus Project levels of service at study intersection are identified in Table 4.16.K. Implementation of previously identified **Mitigation Measures TRA-1** through **TRA-7** were assumed to be in place in the General Plan Buildout plus Project level of service analysis. As shown in Table 4.16.K, the proposed Project is forecast create a significant impact at five study area intersections during the AM and/or PM peak hour. These intersections include:

- Adams Street/Magnolia Avenue – LOS E during the AM and PM peak hours;
- Adams Street/SR-91 Westbound Ramp – LOS D during the AM peak hour;
- Adams Street/SR-91 Eastbound Ramp – LOS D during the AM peak hour and LOS F during the PM peak hour;
- Magnolia Avenue/Monroe Street – LOS F during the AM and PM peak hours; and

[2] Traffic Impact Analysis, California Baptist University, City of Riverside, September 2018.

- Magnolia Avenue/Jefferson Avenue – LOS E during the AM peak hour and LOS D during the PM peak hour.

Table 4.16.K
General Plan Buildout Plus Project Intersection Levels of Service

Intersection ID	Intersection Location	General Plan Buildout LOS		General Plan Buildout Plus Project LOS		Significant Impact?
		A.M.	P.M.	A.M.	P.M.	
1	Adams Street/Garfield Street (Signalized)	C	A	C	A	No
2	Adams Street/Magnolia Avenue (Signalized) With mitigation (add EBR)	E	E	E	E	**Yes**
3	Adams Street/Briarwood Drive (Signalized)	B	B	B	C	No
5	Adams Street/Diana Avenue (Unsignalized) WB R (Project to close intersection west leg)	D	C	D	C	No
6	Adams Street/SR 91 WB Ramps (Signalized)	D	B	D	C	**Yes**
7	Adams Street/SR 91 EB Ramps (Signalized)	D	F	D	F	**Yes**
8	Adams Street/Indiana Avenue (Signalized)	D*	D*	D*	D*	No
9	Adams Street/Lincoln Street (Signalized)	D*	C	D*	C	No
10	Magnolia Avenue/Jackson Street (Signalized)	E*	F*	E*	F*	No
11	Magnolia Avenue/Overland Street (Signalized)	C	A	C	B	No
12	Magnolia Avenue/Monroe Street (Signalized)	F	F	F	F	**Yes**
13	Magnolia Avenue/Campus View (Signalized)	B*	C*	A	B	No
14	Magnolia Street/Jefferson Avenue (Signalized)	E	D	E	D	**Yes**
15	Diana Avenue/Monroe Street (Unsignalized)					
	EB L/R	C	C	C	B	No
	NB L	A	A	A	A	No
16	Diana Avenue/Campus View (Unsignalized)	NA	NA	NA	NA	No
17	Diana Avenue/Plaza Driveway (Unsignalized)	NA	NA	NA	NA	No

*Queue exceeds storage length for at least one turn movement.
Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

The Project contributes to the LOS standard deficiencies at the five intersections listed above. This is considered to be a significant cumulative impact and mitigation is required. Impacts to the three City intersections on Magnolia Avenue (i.e., Adams Street/Magnolia Avenue; Magnolia Avenue/Monroe Street; and Magnolia Avenue/Jefferson Avenue) are limited due to the City's policy regarding widening of Magnolia Avenue. The Magnolia Avenue corridor is anticipated to operate at an LOS E as a 4-lane Special Boulevard in the General Plan Buildout condition. The

Magnolia Avenue Specific Plan states the integration of a rapid bus transit system is a consideration for the reduction of traffic volumes along the Magnolia Avenue corridor. In light of this information, the intersections could operate at acceptable levels of service once this system is in place and make mitigation unnecessary. However, lacking any reasonable and feasible mitigation, traffic impacts at three intersections would remain **significant and unavoidable**.

Regarding the Adams Street/SR-91 EB and WB Ramps, improvements to improve levels of service such as those being studied as part of the SR-91/Adams Street PSR would be required. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons Project impacts are considered **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans.

Table 4.16.K also identifies three intersections that are forecast to have at least one turn movement queue that exceeds the existing pocket length in the General Plan Buildout plus Project condition. These intersections include:

- Adams Street/Indiana Avenue; and
- Magnolia Avenue/Jackson Street.

The Project creates or contributes to the queue length exceedances at these intersections which is considered to be a significant impact and mitigation is required. The Adams Street/Indiana Avenue intersection would be reconstructed as part of the SR-91 improvements envisioned by the recently completed SR-91/Adams Street PSR. Project queue related impacts at this intersection are considered **significant and unavoidable** until the PSR improvements are funded or constructed by Caltrans. The queue length exceedances at the Magnolia Avenue/Jackson /Street intersection would be mitigated by implementing the restriping modifications described in **Mitigation Measure TRA-8**. With implementation of this measure, queueing related impacts would be **less than significant with mitigation incorporated.**

Roadway Segments

Table 4.16.L shows the following study area roadway segments are forecast to operate at LOS E or worse in the General Plan Buildout plus Project traffic analysis:

- Magnolia Avenue, between Jefferson Street and Adams Street – LOS E
- Magnolia Avenue, between Adams Street and Campus View Drive – LOS E
- Magnolia Avenue, between Campus View Drive and Monroe Street – LOS E

- Magnolia Avenue, between Monroe Street and Overland Street – LOS E
- Magnolia Avenue, between Overland Street and Jackson Street – LOS E
- Adams Street, between Garfield Street and Magnolia Avenue – LOS E

Table 4.16.L
General Plan Buildout Plus Project Roadway Segment Operations

Roadway Segment[1]	Roadway Classification	LOS D Capacity	No. of Lanes	General Plan Buildout		General Plan Buildout Plus Project LOS	
				ADT	LOS	ADT	LOS
Monroe Street							
b/w Garfield St & Magnolia Ave	Collector	12,499	2	10,129	C	10,129	C
b/w Magnolia Ave and Diana Ave	Arterial	17,999	2	8,983	<C	8,983	<C
with improvements	Arterial	32,999	4	8,983	<C	8,983	<C
b/w Diana Ave and Indiana Ave	Arterial	32,999	4	8,983	<C	8,983	<C
Magnolia Avenue							
b/w Jefferson St and Adams St	Special Blvd*	32,999	4	38,556	E	38,820	E
b/w Adams St and Campus View	Special Blvd*	32,999	4	41,954	E	42,458	E
b/w Campus View and Monroe St	Special Blvd*	32,999	4	43,812	E	43,926	E
b/w Monroe St and Overland St	Special Blvd*	32,999	4	43,995	E	44,318	E
b/w Overland St and Jackson St	Special Blvd*	32,999	4	46,066	E	46,387	E
Adams Street							
b/w California Ave and Garfield St	Arterial	32,999	4	30,756	D	30,864	D
b/w Garfield St and Magnolia Ave	Arterial	32,999	4	34,813	E	34,893	E
b/w Magnolia Ave and Briarwood Dr	Arterial	32,999	4	31,574	D	31,264	D
with improvements	Arterial	41,249	5	31,574	<C	31,264	<C
b/w Briarwood Dr and Diana Ave	Arterial	41,249	5	39,027	D	39,984	D
b/w SR-91 WB Ramp and Indiana Ave	Arterial	41,249	5	39,027	D	39,984	D
b/w Indiana Ave and Lincoln Ave	Arterial	32,999	4	25,702	<C	25,771	<C

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.
*Magnolia Avenue classified per City of Riverside Master Plan of Roadways and Magnolia Avenue Specific Plan.

Although the level of service forecast for these roadway segments is LOS E in the pre-project condition, the Project contributes to the forecast LOS deficiencies. This is considered to be a significant cumulative impact and mitigation is required. Consistent with the City's policy to maintain Magnolia Avenue a 4-lane Special Boulevard, there is no reasonable and feasible mitigation available. Impacts to the segments of roadway on Magnolia Avenue from Jefferson to Jackson Streets would remain **significant and unavoidable**. Regarding Adams Street from Garfield to Magnolia, widening would be required. The feasibility of widening Adams Street

between Garfield Street and Magnolia Avenue to 6 lanes is limited by adjacent single family homes and the Magnolia Avenue Baptist Church. For this reason, widening to a 6 lane roadway is not feasible and therefore impacts would remain **significant and unavoidable**. For the segment of roadway on Adams Street between Briarwood Drive and Indiana Avenue, widening to a 5 lane roadway associated with the SR-91/Adams Street PSR was assumed to be in place.

Freeway Ramps

Table 4.16.M shows that the study area freeway merge/diverge locations are forecast to operate at LOS D or better in the General Plan Buildout plus Project analysis assuming completion of improvements to the SR-91/Adams Street interchange as resulting from the recently completed SR-91/Adams Street PSR. . Because all freeway merge/diverge locations are forecast to operate within acceptable level of service standards, impacts are considered to be **less than significant** and no mitigation is required.

Table 4.16.M
General Plan Buildout Plus Project Ramp Merge/Diverge Analysis

Ramp	General Plan Buildout				General Plan Buildout Plus Project			
	A.M.		P.M.		A.M.		P.M.	
	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS	Density (pc/mi/ln)	LOS
SR 91 Westbound Off-ramp at Adams Street	13.2	B	14.3	B	13.2	B	14.2	B
SR 91 Westbound On-ramp at Adams Street	23.0	C	26.0	C	27.1	C	29.9	D
SR 91 Eastbound Off-ramp at Adams Street	12.8	B	13.6	B	12.7	B	13.7	B
SR 91 Eastbound On-ramp at Adams Street	22.1	C	22.4	C	22.2	C	22.5	C

Source: *California Baptist University Traffic Impact Analysis*, Rick Engineering Company, September 2018.

Threshold C: Would the proposed project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.

The Riverside County Airport Land Use Commission (RCALUC) has developed Airport Land Use Compatibility Plans (ALUCP) for each airport in the County of Riverside, including the Riverside Municipal Airport, which is located approximately 1.1 miles north of the Specific Plan Area. The Specific Plan has been prepared to be consistent with these regulations.[3] The northeastern corner of the CBUSP Zone lies within Zone D (Primary Traffic Patterns and

[3] Draft California Baptist University Specific Plan, November 6, 2017.

Runway Buffer Area), with the remainder of the CBUSP located in Zone E (Other Airport Environs) of the Land Use Compatibility Plan prepared for Riverside Municipal Airport,[4] as shown on Figure 4.8-1.

In Zone D, any development over 70 feet tall will be subject to airspace review by the RCALUC, and highly noise-sensitive outdoor nonresidential and hazards to flight uses are prohibited.[5] The residential density criteria for that portion of Zone D at Riverside Municipal Airport lying within the boundary of the City of Riverside is established to enable the density of future development to be similar to what now is common in the area. Additionally, schools, hospitals, and nursing homes are discouraged within Zone D. In Zone E, any development over 100 feet tall will be subject to airspace review pursuant to California Public Utilities Code Section 21676, and any major spectator-oriented sports stadiums, amphitheaters, and concert halls are discouraged beneath principal flight tracks.[6]

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

Per California Public Utilities Code Section 21676, "prior to the amendment of a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission."[6] Light standards generally shall be a maximum height of 99 feet. However, higher standards may be installed as required for specific needs, subject to review by the RCALUC for compliance with the Riverside County ALUCP.

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

Threshold D: Substantially increased hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The design of roadways must provide adequate sight distance and traffic control measures. This provision is normally realized through roadway design to facilitate roadway traffic flows. The

4 *Riverside County Airport Land Use Compatibility Plan Policy Document.* Adopted by Riverside County Airport Land Use Commission. Adopted March 22, 2005.

5 Table 2A, Chapter 2 Countywide Policies, Riverside County Airport Land Use Commission, October 2004.

6 California Legislative Information, effective January 1, 2004.

site is currently occupied by the CBU campus; however, the project would introduce an additional 3,000 students by 2025. To accommodate this growth, CBU has plans to improve the internal circulation system on the core campus.

The design of these future circulation system improvements would not include any sharp curves or dangerous intersections. Roadway improvements in and around the project site would be designed and constructed to satisfy all City requirements for street widths, corner radii, intersection control, site access requirements, and internal circulation. As part of the City's standard plan check process, the final design of all roadways, intersections, and circulation within and adjacent to the project site would be reviewed by and subject to approval by City staff prior to issuance of any applicable grading, construction, or occupancy permit, which would preclude uses that are incompatible with existing on-site or adjacent development. The review and approval by City staff sufficiently ensures the project will incorporate the necessary design features to provide safe travel to, from, and within the project site.

For the reasons set forth above, the proposed Project will not substantially increased hazards due to a design feature or incompatible uses, and impacts are considered to be **less than significant**. No mitigation is required.

Threshold E: Result in inadequate emergency access?

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

Threshold F: Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise cause a decrease in the performance or safety of such facilities.

Project consistency with City General Plan policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities contained are presented in Table 4.10-1 in the Land Use and Planning Section of this EIR.

The proposed Project area would have accessibility via public transit. The RTA currently provides bus service to the project area; Route 1 and RapidLink runs along Magnolia Avenue just north of the project site. Route 1 services CBU directly and has many transfer points along the route, including the Galleria at Tyler shopping center. RTA also runs Route 14 along Indiana Avenue that parallels Route 1. As identified in Chapter 5 of the CBUSPA, "benches should be placed individually or in groups at bus stops, along active pedestrian ways, in plazas, and at key pedestrian crosswalks."[7] Surrounding the CBU campus are Class 2 bicycle facilities. The following bus stops are located on Magnolia Avenue:

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

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

4.16.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires EIRs to describe feasible measures that can minimize significant impacts. The following mitigation measure has been evaluated for feasibility and is incorporated in order to reduce potentially significant traffic impacts.

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

MM TRA-2: Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be

[7] Chapter 5, Design Guidelines, Draft California Baptist University Specific Plan, XX.

13.65%, for the following improvements to the Adams Street/Magnolia Avenue intersection:

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

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

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

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

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

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

MM TRA-6: Prior to issuance of the certificate of occupancy of Phase II of the South Campus Student Housing, or before, CBU shall contribute a fair share, calculated to be

11.01%, for the following improvements to the Magnolia Avenue/Jefferson Street intersection:

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

MM TRA-7: Prior to the issuance of the certificate of occupancy of the East Parking Structure, installation of curb and gutter at 53 feet from monument centerline, sidewalk and matching paving on Adams Street from Lancer Lane/Briarwood Drive to the westbound 91 freeway on-ramp is required. The City has determined that the required improvements shall terminate at the Diana Avenue monument centerline along the Shell Gas Station's Adams Street frontage.

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

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

4.16.7 Environmental Impacts After Mitigation Is Incorporated

Existing Plus Project Intersection Impacts

Intersection impacts can be reduced by incorporating **Mitigation Measures TRA-1** through **TRA-3** as described in Section 4.16.6. Impacts would remain significant and unavoidable at the following intersections:

- Adams Street/SR-91 Westbound Ramps.
- Adams Street/SR-91 Eastbound Ramps.

Existing Plus Project Roadway Impacts

Roadway impacts were determined to be less than significant in the existing plus Project condition and no mitigation is required.

Existing Plus Project Freeway Merge/Diverge Impacts

There are no feasible measures to mitigate impacts to the state highway system. Impacts would remain significant and unavoidable at the following freeway merge/diverge locations:

- SR 91 Eastbound On-ramp at Adams Street.

Existing Plus Ambient Plus Cumulative Plus Project Intersection Impacts

Intersection impacts can be reduced by incorporating **Mitigation Measures TRA-1** through **TRA-3** as described in Section 4.16.6 for the Existing Plus Project condition and **Mitigation Measures TRA-4** through **TRA-6**. Impacts would remain significant and unavoidable even after mitigation at the following intersections:

- Adams Street/SR-91 West Ramp; and
- Adams Street/SR-91 Eastbound Ramp.

Existing Plus Ambient Plus Cumulative Plus Project Roadway Impacts

Roadway Intersection impacts can be reduced by incorporating **Mitigation Measure TRA-7** as described in Section 4.16.6. Impacts would remain significant and unavoidable even after mitigation at the following roadway segments:

- Adams Street, between SR 91 WB Ramps and SR 91 WB Ramps – LOS E.

Existing Plus Ambient Plus Cumulative Plus Project Freeway Merge/Diverge Impacts

There are no feasible measures to mitigate impacts to the state highway system. Impacts would remain significant and unavoidable at the following freeway merge/diverge locations:

- SR 91 Eastbound On-ramp at Adams Street.

General Plan Buildout Plus Project Intersection Impacts

Intersection impacts can be reduced by incorporating **Mitigation Measures TRA-1** through **TRA-7** as described in Section 4.16.6 for the Existing Plus Project and the Existing Plus Ambient Plus Cumulative Plus Project conditions and **Mitigation Measure TRA-8**. Impacts would remain significant and unavoidable even after mitigation at the following intersections:

- Adams Street/Magnolia Avenue;
- Adams Street/SR-91 Westbound Ramps;

- Adams Street/SR-91 Eastbound Ramps;
- Magnolia Avenue/Monroe Street;
- Magnolia Avenue/Jefferson Street.

General Plan Buildout Plus Project Roadway Impacts

Impacts would remain significant and unavoidable even after mitigation at the following roadway segments:

- Magnolia Avenue, all five segments from Jefferson Street to Jackson Street;
- Adams Street, between Garfield Street and Magnolia Avenue.

4.16.8 References

City of Riverside. *California Baptist University Specific Plan, Public Review Draft.* September 2018.

City of Riverside. *City of Riverside General Plan 2025*. Approved November 2007. (Available at http://www.riversideca.gov/planning/gp2025program/general-plan.asp).

City of Riverside, *City of Riverside General Plan 2025 and Supporting Documents Final Program Environmental Impact Report*. Certified December 2007. (Available at http://www.riversideca.gov/planning/gp2025program/)

Rick Engineering, *California Baptist University Traffic Impact Analysis*, City of Riverside, September 2018.

Western Riverside Council of Governments, *EXHIBIT H-1, TUMF Network Detailed Cost Estimate*, effective July 10, 2017.

Western Riverside Council of Governments, *Transportation Uniform Mitigation Fee Administrative Plan*, December 4, 2017.

4.17 TRIBAL CULTURAL RESOURCES

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section identifies and evaluates the project's potential adverse impacts related to Tribal Cultural Resources (TCR). The resources of concern include, but are not limited to, prehistoric and historic artifacts and/or historic structures. This section provides a detailed discussion of impacts potentially attributable to the proposed project and criteria used to determine impact significance to Tribal Cultural Resources.

In response to the NOP, the California Native American Heritage Commission (NAHC) sent a letter dated May 5, 2016 to the City stating the Project is subject to California Government Code Sections 65040.2, 65352.3 et seq. Additionally, the NAHC noted that CEQA was modified via Assembly Bill (AB) 52, and tribal consultation is now required under both AB52 and Senate Bill (SB) 18. The NAHC outlined the basic provisions of AB 52 and SB 18 consultation as well as recommendations for the preparation of Cultural Resource Assessments.

The project's potential impacts to non-tribal cultural and paleontological resources are addressed in Section 4.5, Cultural Resources. This section addresses impacts related to burial sites and other sites of religious or cultural significance to Native American groups, as well as a summary of the Native American contact and consultation conducted for the Project. The analysis contained in this section is based upon the consultations between the City and Native American tribal government(s) conducted pursuant to SB 18 and AB 52 as well as the following reports:

- *Cultural Resources Survey, California Baptist University Specific Plan.* JM Research and Consulting. 2012.
- *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services August 2018 (EIR Appendix D).

Preparation of the project-specific Cultural Resource Assessment[1] is in accordance with *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.*[2]

[1] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

[2] *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.* United States Department of the Interior, National Parks Service, Technical Preservation Services. Washington D.C. Kay D. Weeks and Anne E. Grimmer. 1995.

4.17.1 Setting

Existing Conditions

The Project site is situated within the traditional boundary region of three Native American groups, the Gabrieliño (Tongva), the Cahuilla, and the Luiseño.[3,4,5,6,7,8,9] Tongva territory includes the Santa Ana River watershed and stretches from the San Gabriel Mountains to Laguna Hills and from the southern Channel Islands to the San Bernardino Valley. Tongva language is derived from the Takic family, part of the Uto-Aztecan linguistic stock. The term "Gabrieliño" came from the association with the Mission San Gabriel Archangel; however, today the group prefers to be known by Tongva, their ancestral name.

The basis of the Tongva religious life at the time of Spanish contact was Chingichnich, centered on a heroic, mythological figure who created mankind and established the rules and laws by which adherents would live their daily lives. The Tongva established permanent villages with houses that were large, circular, and domed that could hold up to 50 people. They cleared areas along the landscape for races and games such as lacrosse and pole throwing, recreation activities that occurred adjacent to the villages. Each of the larger villages would have a wankech-an enclosure containing a representation of Chingichnich.

The Cahuilla culture area incorporated east-central Riverside County, consisting of desert, pass (San Gorgonio Pass), and mountain groups, with each affiliation describing the exploitation area of each group. Desert Cahuilla ranged throughout the Coachella Valley from almost El Centro to Cabazon; the Pass Cahuilla occupied San Gorgonio Pass, and the Mountain Cahuilla occupied the Santa Rosa Mountains. The Cahuilla are linguistically comprised of a language belonging to the Cupan subgroup of the Takic family of the Shoshonean (Uto-Aztecan) linguistic stock.

Cahuilla villages usually were in canyons or near sources of water and food plants. The retreat of Lake Cahuilla, an ancient lake once three times the size of the existing Salton Sea, began at

---

3 Gabrielino. In *Handbook of North American Indians, Volume 8, California*. Pp. 538-549. Bean, Lowell J. and Charles R. Smith. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

4 *Handbook of the Indians of California, Bureau of American Ethnology Bulletin 78*. Kroeber, Alfred L. Smithsonian Institution, Washington D.C. 1925.

5 *The First Angelinos: the Gabrielino Indians of Los Angeles.* W. McCawley. Morongo Indian Reservation, Banning: Malki Museum Press. 1996.

6 California Archaeology. Moratto, Michael J. San Diego: Academic Press. 2004.

7 *Perris Reservoir Archaeology: Late Prehistoric Demographic Change in Southeastern California.* O'Connell, J. F., P. J. Wilke, T. F. King, and C. L. Mix (Eds.) Sacramento: Department of Parks and Recreation Archaeological Reports, Page 14. 1974

8 *Late Prehistoric Change in Land Use Patterns at Perris Reservoir*. Wilke, P. J. Los Angeles: University of California, Los Angeles Archaeological Survey Annual Report. Pp. 155-164. 1971.

9 Luiseño. In *Handbook of North American Indians, Volume 8, California.* Pp. 550-563. Bean, Lowell J. and Florence C. Shipek. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

approximately A.D. 1500. Within just a few decades the salinity of the lake water was such that it was no longer able to be used for human consumption. The eventual desiccation of Lake Cahuilla resulted in the emigration of human populations (proto-historic Cahuilla) to the south and west through San Gorgonio Pass into the San Jacinto Plains.

Spring Rancheria, occupied from approximately 1880 to 1900, was one of the Cahuilla villages near the Project site, located on the north side of Mount Rubidoux where Spring Brook joins with the Santa Ana River. Spring Rancheria was listed in the *1889 Riverside City Directory,* which documents that the villagers worked for nearby Riverside residents.[10]

The territory of the Luiseño included portions of San Diego, Riverside, and Orange Counties. The term "Luiseño" was given to those native people living within the "ecclesiastical jurisdiction of Mission San Luis Rey... [and who shared] an ancestral relationship which is evident in their cosmogony, and oral tradition, common language, and reciprocal relationship in ceremonies."[11] Prior to Spanish occupation of California, the territory of the Luiseño extended along the coast from Agua Hedionda Creek to the south, Aliso Creek to the northwest, and the Elsinore Valley and Palomar Mountain to the east. These territorial boundaries were somewhat fluid and changed through time. They encompassed an extremely diverse environment that included coastal beaches, lagoons and marshes, inland river valleys and foothills, and mountain groves of oaks and evergreens.

The Luiseño lived in small communities that were the focus of family life. Patrilineally linked, extended families occupied each village. The Luiseño believed in the idea of private property. Property rights covered items and land owned by the village as well as items (houses, gardens, ritual equipment, trade beads, eagle nests, and songs) owned by individuals. Trespass against any property was punished. Luiseño villages were politically independent, and were administered by a chief who inherited his position from his father.

Luiseño subsistence was based primarily on seeds such as acorns, grass seed, manzanita, sunflower, sage, chía, and pine nuts and game animals such as deer, rabbit, jackrabbit, wood rat, mice, antelope, and many types of birds. Seeds were dried and ground to be cooked into a mush. The Luiseño utilized fire for crop management and communal rabbit drives.

[10] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update.* Wilkman Historical Services. August 2018.

[11] *The Luiseno Village During the Late Prehistoric Era.* Unpublished Ph.D. Dissertation, Department of Anthropology, University of California, Riverside. Joan Oxendine. 1983.

4.17.2 Related Regulations

Federal Regulations

The Native American Graves Protection and Repatriation Act (NAGPRA) was enacted on November 16, 1990, to address the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to Native American cultural items, including human remains, funerary objects, sacred objects, and objects of cultural patrimony. The NAGPRA assigned implementation responsibilities to the Secretary of the Interior. The National NAGPRA program provides support for the following activities:

- Publishing notices for museums and federal agencies in the Federal Register;
- Creating and maintaining databases, including the Culturally Unidentifiable Human Remains Inventories (CUI) Database;
- Making grants to assist museums, Indian tribes, and Native Hawaiian organizations in fulfilling NAGPRA;
- Assessing civil penalties on museums that fail to comply with provisions of the Act;
- Providing staff support to the NAGPRA Review Committee and for the Annual Report to Congress;
- Providing technical assistance to federal agencies where there are excavations and discoveries of cultural items on federal and Indian lands;
- Promulgating implementing regulations; and
- Providing technical assistance through training, website information, reports prepared for the Review Committee, supporting law enforcement investigations, and direct personal service.

The National Park Service has compliance obligations for parks, separate from the National NAGPRA Program. National NAGPRA is the omnibus program, the constituent groups all of which are Federal agencies, museums that receive federal funds, tribes and Native Hawaiian organizations, and the public.

State Regulations

Senate Bill 18. Signed into law in September 2004, and effective March 1, 2005, SB 18 permits California Native American tribes recognized by the NAHC to hold conservation easements on terms mutually satisfactory to the tribe and the landowner. The term "California Native American tribe" is defined as "a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC."

The bill requires a City or County to consult with California Native American tribes for the purpose of preserving specified places, features, and objects located prior to the adoption or amendment of a General Plan or Specific Plan. This bill requires the planning agency to refer to the California Native American tribes specified by the NAHC and to provide them with opportunities for involvement.

Assembly Bill 52. Effective July 1, 2016, AB 52 created a new environmental resource (tribal cultural resources) that must be considered under CEQA. AB 52 requires Lead Agencies evaluate a project's potential to impact "tribal cultural resources" which may include "… [s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources."

AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if they have requested notice of projects proposed within that area. Consultation may include discussing the type of environmental review necessary, the significance of tribal cultural resources, the significance of the project's impacts on the tribal cultural resources, and alternatives and mitigation measures recommended by the tribe. Consultation must be conducted in good faith between the tribal government and the lead agency and is deemed concluded when either the parties agree to measures to mitigate or avoid a significant effect on a tribal cultural resource (should a significant effect exists) or when a party concludes that mutual agreement cannot be reached.

California Health and Safety Code. The California Health and Safety Code Section 7050.5 states that if human remains are discovered onsite, no further disturbance shall occur until the County Coroner has made a determination of origin and disposition. If the Coroner determines that the remains are not subject to his or her authority and if the Coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the NAHC. This regulation is applicable to any project where ground disturbance would occur.

Local Regulations

City of Riverside General Plan 2025. The following goals and objectives pertaining to Tribal Cultural Resources are drawn from the City's General Plan 2025 and are applicable to the proposed project. Although listed here, each of these objectives and policies are presented in Table 4.10-1 of the Land Use and Planning Section of the EIR with an evaluation of the Project's consistency with the stated objectives and policies.

Historic Preservation Element[12]

Objective HP-4: To fully integrate the consideration of cultural resources as a major aspect of the City's planning, permitting and development activities.

Policy HP-4.3: The City shall work with the appropriate tribe to identify and address, in a culturally appropriate manner, cultural resources and tribal sacred sites through the development review process.

4.17.3 Thresholds of Significance

Per Appendix G of the State *CEQA Guidelines*, a project would have a significant impact on tribal cultural resources if it would:

- (Threshold A) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
  - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
  - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Methodology

The methodology used to address potential impacts to Tribal Cultural Resources included the notification of tribal governments. Subsequent confidential contact between the City and the consulting tribal governments was conducted prior to receiving information relative to tribal concerns and developing appropriate mitigation to address any potential impact.

[12] Historic Preservation Element. *City of Riverside General Plan 2025*. City of Riverside, November 2007, Amended November 2012.

4.17.4 Project Design Features

There are no Project Design Features relative to Tribal Cultural Resources. However, design guidelines related to cultural and historic resources can be viewed in Section 4.5, Cultural Resources.

4.17.5 Environmental Impacts Before Mitigation

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

(i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or

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

A discussion of potential National Register of Historic Places and California Register of Historic Places resources has been provided in Section 4.5, Cultural Resources. Wilkman Historical Services (WHS) conducted a cultural resources survey and evaluation in support of the proposed CBUSP Amendment. The WHS report included updates to historic designations of eight (8) CBU properties previously addressed in the JM Research and Consulting (JMRC) report as part of the 2013 CBUSP,[13] as well as historic designation evaluations to two (2) additional properties not administered by CBU at the time of adoption of the 2013 CBUSP (Table 4.5.B).[14]

The WHS report for the proposed CBUSP Amendment concluded that select cultural resources previously identified as significant by the JMRC report are not significant and therefore, do not qualify for national, State, or local register eligibility. Two additional cultural resources previously identified by JMRC as significant and therefore eligible for the local register have

[13] *Cultural Resources Survey, California Baptist University Specific Plan*. JM Research and Consulting. 2012.
[14] *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update*. Wilkman Historical Services. August 2018.

since been relocated or demolished and are no longer extant within the CBU Specific Plan Zone (Table 4.5.C, Cultural Resources).

None of the previous cultural resources investigations identified Tribal Cultural Resources determined to be eligible for the CRHR or of significance pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. The only artifact of Native American origin previously identified within the CBU Specific Plan Zone is a single, isolated granitic ground stone fragment located along the former Riverside Lower Canal alignment. Pursuant to Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f), mitigation measures **MM-CUL-1** and **MM-CUL-2** require cultural resources monitoring for ground-disturbing activities in native soils in proximity to the known alignment of the Riverside Lower Canal to ensure any unanticipated archaeological discoveries are managed in accordance with CEQA guidelines. Additionally, at a programmatic level, **MM-CUL-3** requires all future development within the CBU Specific Plan Zone to protect cultural resources by temporarily halting ground disturbing activities and consulting with a qualified archaeologist in the event of an unanticipated cultural resources encounter. Additionally, the CBUSP Amendment incorporates self-mitigating project design features outlined in Section 4.5.4 of this EIR providing specific requirements, such as compliance with Title 20 of the RMC, to be met for all subsequent development projects, including reuse, repurpose, or demolition, pertaining to historical resources within the CBU Specific Plan Zone (Table 4.5.A).

With implementation of **MM-CUL-1, MM-CUL-2**, and **MM-CUL-3**, as well as incorporation of CBUSP project design features outlined in Section 4.5.4 of this EIR, impacts to Tribal Cultural Resources determined to be eligible for the CRHR or of significance pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 would be **less than significant**.

> Consultation letters pursuant to SB 18 and AB 32 were mailed out to 31 tribes on March 21, 2016. In its consultation response, out of those 31 tribes, the Agua Caliente Band of Cahuilla Indians (ACBCI) has expressed interest in the project. The ACBCI has identified that the project is not located within their boundaries. However, the project is within the Tribes Traditional Use Area (TUA). Because of this, the ACBCI THPO requests the following:
>
> "*At this time ACBCI has no comments, but please continue to provide our office with updates as the project progresses. Also, please inform our office if there are changes to the scope of this project."*

Other than the Agua Caliente Band of Cahuilla Indians, no additional tribes have requested notification of the proposed Project. Through continued consultation with the ACBCI as

requested, the project would have **less than significant** impacts related to tribal consultation, and no mitigation is required.

4.17.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. The following mitigation measures were previously referenced in Section 4.5.6 of this EIR, have been evaluated for feasibility, and are incorporated in order to reduce potentially significant impacts related to Tribal Cultural Resources determined to be eligible for the CRHR or of significance pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.

MM-CUL-1: Prior to the issuance of grading permits, the applicant shall submit to the City for review and approval, evidence that qualified professional archeologist(s) has been retained to monitor ground-disturbing activities of native soil (e.g., vegetation removal, grading, excavation, removal of foundations, and/or trenching) occurring within 50 feet of the following CBU Facilities:

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

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

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

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

MM-CUL-2: 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 and applicant, and the City shall notify the appropriate Native American tribes, should any such discovery be made during the course of ground-disturbing activities.

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

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

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

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

MM-CUL-3: 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 City Planning Division.

4.17.7 Environmental Impacts After Mitigation Is Incorporated

Incorporation of mitigation measures **MM-CUL-1, MM-CUL-2,** and **MM-CUL-3** presented in Section 4.17.6 of this EIR would reduce impacts to Tribal Cultural Resources determined to be eligible for the CRHR or of significance pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 to less than significant levels.

4.17.8 References

Bean, Lowell J. and Charles R. Smith. Gabrielino. In *Handbook of North American Indians, Volume 8, California.* Pp. 538-549. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

Bean, Lowell J. and Florence C. Shipek. Luiseño. In *Handbook of North American Indians, Volume 8, California.* Pp. 550-563. Edited by Robert F. Heizer. Smithsonian Institution, Washington, D.C. 1978.

Historic Preservation Element. City of Riverside General Plan 2025. City of Riverside, November 2007, Amended November 2012.

JM Research and Consulting. Cultural Resource Survey, California Baptist University Specific Plan, 2012.

Kroeber, Alfred L. *Handbook of the Indians of California, Bureau of American Ethnology Bulletin 78*. Smithsonian Institution, Washington D.C. 1925.

Moratto, Michael J. *California Archaeology.* San Diego: Academic Press. 2004.

O'Connell, J. F., P. J. Wilke, T. F. King, and C. L. Mix (Eds.). *Perris Reservoir Archaeology: Late Prehistoric Demographic Change in Southeastern California.* Sacramento: Department of Parks and Recreation Archaeological Reports, Page 14. 1974.

Oxendine, Joan. *The Luiseno Village During the Late Prehistoric Era.* Unpublished Ph.D. Dissertation, Department of Anthropology, University of California, Riverside. 1983.

W. McCawley. *The First Angelinos: the Gabrielino Indians of Los Angeles.* Morongo Indian Reservation, Banning: Malki Museum Press. 1996.

Weeks, Kay D. and Anne E. Grimmer. *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings.* United States Department of the Interior, National Parks Service, Technical Preservation Services. Washington D.C. 1995.

Wilke, P. J. *Late Prehistoric Change in Land Use Patterns at Perris Reservoir.* Los Angeles: University of California, Los Angeles Archaeological Survey Annual Report. Pp. 155-164. 1971.

Wilkman Historical Services. *Cultural Resources Survey and Evaluation Technical Report, California Baptist University Specific Plan Update,* August 2018.

4.18 UTILITIES AND SERVICE SYSTEMS

Based on Appendix G of the State California Environmental Quality Act (CEQA) Guidelines and comments received during the Notice of Preparation (NOP) public comment period, this section evaluates the proposed Project's potential adverse impacts to water supply, wastewater, storm drainage systems and solid waste. In response to the NOP, the Metropolitan Water District of Southern California (MWD) provided a written comment dated May 19, 2016 stating any proposed uses within or in proximity to MWD's easement must be reviewed and approved by MWD in writing. The analysis contained in this section is based upon the following reports:

- *Water Demand Calculation for the California Baptist University Specific Plan Amendment.* Rick Engineering Company, August 30, 2017 (EIR Appendix G).
- *2025 Sewer Capacity Study for California Baptist University, California Baptist University Specific Plan Update.* Rick Engineering Company. August 8, 2018 (EIR Appendix G).

4.18.1 Setting

Existing Conditions

Project Site. The approximately 167-acre CBUSP Amendment Planning Area is located in the City of Riverside and surrounded by existing urban uses. The Project site is currently developed with academic buildings, student housing, athletic facilities, arts and culture venues, parking lots, commercial uses, and an open space network of lawns, athletic fields, plazas, courtyards, and water quality basins within an urbanized area.

The MWD owns and operates the 124-inch-inside-diameter Upper Feeder Pipeline within a 40-foot-wide easement through the western portion of the CBU property containing the Health Science Campus. Any proposed uses within or in proximity to MWD's easement must be reviewed and approved by Metropolitan in writing in accordance with their legal right associated to maintain adequate access within the easement area.

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

Water Supply. The Project site lies within the Riverside Public Utilities (RPU) service area, in the 997-pressure zone area. RPU service encompasses seventy-four (74) square miles, sixty-eight (68) of which lie within the City limits and the balance within the City's sphere of influence.

RPU's water supply consists primarily of groundwater from the Bunker Hill Basin, Riverside North, and Riverside South sub-basins. Groundwater is conveyed to RPU's potable or non-potable distribution system depending on the well location and local water quality. The western portion of the CBU campus is within the Arlington water basin while the remainder of the CBU campus is within the Riverside south water basin. [1] RPU's historical production from each groundwater basin for the past five years is shown in Table 4.18.A.

Table 4.18.A
Groundwater Volume Pumped

Location or Basin Name	Water Quality	2010	2011	2012	2013	2014	2015
Bunker Hill	Drinking Water	45,360	46,148	50,515	46,702	47,862	48,086
Riverside North	Drinking Water	8,993	7,397	10,862	9,237	6,735	5,095
Riverside South	Drinking Water	11,942	13,773	10,926	14,859	15,221	7,966
Bunker Hill	Raw Water	4,229	4,191	5,859	7,329	5,399	5,707
Riverside North	Raw Water	3,127	5,339	4,319	2,943	2,013	1,262
Riverside South	Raw Water	8,695	7,739	7,921	5,976	6,595	5,605
Rialto-Colton	Raw Water	0	0	0	0	0	12,005
Total		82,346	84,587	90,402	87,046	83,825	74,926

Source: Table 7-2, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

The City of Riverside's Public Utilities Water Division 2015 water demand and supply assessment, the 2015 Urban Water Management Plan (UWMP), projected the City will have surplus water available beyond its projected water demands through 2035 in a normal water year, and in a single-dry year, and multiple-dry year.

Recent drought regulations have induced significant changes in water consumption patterns, and there is considerable uncertainty as to how demands will change in the future if the drought subsides. Given this uncertainty, RPU elected to apply a percentage growth rate to demands across the service area for the 2015 UWMP.

The RPU service area is approximately 80 percent built out and contains about 15 percent vacant land available for development. RPU has identified three categories of growth for ultimate build out: (1) development within the remaining vacant land, (2) increased density within areas already developed as defined in the City's *General Plan 2025*, and (3) water demand associated with growth and expansion at the University of California Riverside (UCR) and California Baptist University."[2] RPU's historical water use for the years from 2011 through 2015, and RPU's

[1] Figure PF 1.1, City of Riverside General Plan 2025, Public Facilities and Infrastructure Element, amended November 2012.

[2] *2015 Urban Water Management Plan*. Page 4-7. Riverside Public Utilities Water Division. June 2016.

projected water use for the years from 2020 through 2040 are summarized in Table 4.18.B and Table 4.18.C. Table 4.18.D shows the total water demands.

Table 4.18.B
Demands for Raw and Potable Water - Actual

Use Type	Level of Treatment When Delivered	2011	2012	2013	2014	2015
Commercial/Institutional	Drinking Water	9,564	10,488	10,234	10,283	8,950
Total		**84,587**	**90,401**	**87,046**	**83,824**	**74,928**

Source: Table 5-1, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

Table 4.18.C
Demands for Raw and Potable Water - Projected

Use Type	Level of Treatment When Delivered	2020	2025	2030	2035	2040
Commercial/Institutional	Drinking Water	9,959	10,337	10,728	11,135	11,556
Total		**88,791**	**90,104**	**92,585**	**95,159**	**97,827**

Source: Table 5-2, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

Table 4.18.D
Total Water Demands

Demand	2015	2020	2025	2030	2035	2040
Potable and Raw Water	74,928	88,791	90,104	92,585	95,159	97,827
Recycled Water Demand	200	6,430	6,430	6,430	6,430	6,430
Total Water Demand	**75,128**	**95,221**	**96,534**	**99,015**	**101,589**	**104,257**

Source: Table 5-3, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

The CBU campus water needs are currently met by both on-site wells and City's water supplies. CBU estimates that its on-site wells supply approximately 85 percent of non-potable water demand, contributing to landscaping, lawns, and athletic fields. Potable water is supplied to the CBU campus by Riverside Public Utilities. RPU has a total of 201 wells, 50 of which are potable wells; 14 are non-potable wells; 85 are monitoring wells; and 50 are not active.[3],[4] RPU has the ability to purchase State Water Project water from Western Municipal Water District (WMWD) through a connection at the Metropolitan Water District of Southern California (MWD) Henry J. Mills Water Treatment Plant (WTP). Up to 30 cubic feet per second (cfs) or 19.4 million gallons per day (mgd) of imported water can be purchased from WMD.

[3] *California Baptist University Specific Plan, Public Review Draft.* Chapter 3 Section D, Subsection 1 & 4. City of Riverside. August 2018.

[4] *2015 Urban Water Management Plan*. Page 7-1. Riverside Public Utilities Water Division. June 2016.

RPU has assumed that 100 percent of its groundwater and recycled water supplies would remain available during a single dry year and multiple dry years. The availability of imported water has been adjusted based on the scenarios identified for the State Water Project. Tables 4.18.E, 4.18.F, and 4.18.G shows the comparisons of expected supply and demand during a normal year, single dry year, and multiple dry years.

Table 4.18.E
Normal Year Supply and Demand Comparison

Totals	2020	2025	2030	2,035	2,040
Supply Totals	116,903	121,903	124,703	124,703	124,703
Demand Totals	95,221	96,534	99,015	101,589	104,257
Difference	21,682	25,369	25,688	23,114	20,446

Source: Table 8-2, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

Table 4.18.F
Single Dry Year Supply and Demand Comparison

Totals	2020	2025	2030	2035	2040
Supply Totals	96,288	101,288	104,088	104,088	104,088
Demand Totals	95,221	96,534	99,015	101,589	104,257
Difference	1,067	4,754	5,073	2,499	(169)

Source: Table 8-3, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

Table 4.18.G
Multiple Dry Years Supply and Demand Comparison

Year	Totals	2020	2025	2030	2035	2040
First Year	Supply Totals	102,364	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	104,257
	Difference	7,143	10,830	11,149	8,575	5,907
Second Year	Supply Totals	102,394	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	104,257
	Difference	7,143	10,830	11,149	8,575	5,907
Third Year	Supply Totals	102,364	107,364	110,164	110,164	110,164
	Demand Totals	95,221	96,534	99,015	101,589	10,4257
	Difference	7,143	10,830	11,149	8,575	5,907

Source: Table 8-4, 2015 Urban Water Management Plan, June 2016.
All units are in Acre-Feet per year.

Existing water distribution lines throughout the campus include a 12-inch line on Magnolia Avenue, a 6-inch line and a 12-inch line on Adams Street, an 8-inch line and a 6-inch line on Diana Avenue, and a 6-inch line on Monroe Street. These existing lines are owned and

maintained by the City. The CBU campus is connected to these main lines provided by the municipal water service. The existing and planned potable water facilities within the core of the CBUSP Planning Area are shown in Figure 4.18-1. The existing and planned non-potable water facilities within the core of the CBUSP Planning Area are shown in Figure 4.18-2.

Wastewater Services. Wastewater collection and treatment service is provided by the City of Riverside Public Works Department (RPW). The City's wastewater collection system includes over 800 miles of gravity sewers and 19 wastewater pump stations.[5] Wastewater is treated at the Riverside Water Quality Control Plant (RWQCP) located at 5950 Acorn Street, south of the Santa Ana River at Van Buren Boulevard, approximately 2.3 miles northwest of the CBU campus. In 2005, the RWQCP treated almost thirty-three (33) million gallons of sewage per day for 280,000 residents of Riverside and other served communities. Currently, the RWQCP has a design capacity of 46 million gallons per day (mgd).[6]

The RWQCP consists of two separate treatment plants and one common tertiary filtration plant, providing, primary, secondary and tertiary treatment.[7] Connection and capacity fees are charged by RPW when a new development occurs in order to account for the collection and treatment of the additional flow. As of August 2017, the RWQCP current treats approximately 27.2 mgd of wastewater.[8]

CBU is located within the Arlanza Sewer Study Basin east of Tyler Street. Sewer flows are conveyed via gravity lines to the RWQCP.[9]

Current CBU generated wastewater flows leave campus to existing City sewer mains in Adams Street, Magnolia Avenue, Diana Avenue and Monroe Street. The existing Adams Street sewer main services both academic/administrative uses [Lancer Plaza North, existing Recreation Center/Athletics Performance Center, 3739 Adams Street (formerly College of Engineering), and the School of Nursing] and student housing uses (The Point, The Villages, and Tower Hall). The existing Magnolia Avenue sewer main(s) service both academic/administrative uses (via the existing private 8 inch sewer in Campus Bridge Drive out to Magnolia Avenue and include a majority of the academic/administrative demand for the campus) and student housing uses (Cottages student housing area, University Place and the Colony). Properties north of Magnolia Avenue sewer to the north, not to Magnolia Avenue.

5 City of Riverside General Plan 2025, Public Facilities and Infrastructure Element, amended November 2012.
6 *2015 Urban Water Management Plan*. Page 7-7. Riverside Public Utilities Water Division. June 2016
7 City of Riverside, City of Arts and Innovation, Riverside Water Quality Control Plant.
8 Personal Phone Call with Robert Eland, Wastewater Analyst, September 5, 2017.
9 *California Baptist University Specific Plan, Public Review Draft*. Chapter 3 Section E, Subsection1. City of Riverside. August 2018.

The existing Monroe Street sewer main(s) service academic/administrative uses [Health Science Campus (formerly Riverside Christian School) and the new Wellness Center (formerly Carnegie pre-school)] and student housing uses (Lancer Arms, Smith Hall, Simmons Hall and the residential homes on Emily Court and Wilma Court via Diana Ave), as well as the existing Events Center. The residential homes on Emily Court and Wilma Court are the only properties that currently sewer to Diana Avenue.

Described below are the existing sewer facilities:

- Eight-inch sewer line originating in Adams Street just northwest of Briarwood Drive and Draining westerly on Adams Street to Magnolia Avenue.
- Eight-inch sewer line in Magnolia Avenue that drains southwesterly to Monroe Street.
- Fifteen-inch sewer trunk line in Monroe Avenue northwest of the campus.
- Eight-inch sewer line in Diana Avenue from north end of campus to Monroe Street.
- Twelve-inch sewer line that flows northwesterly on Monroe Street from Diana Avenue to the beginning of the eight-inch and fifteen-inch parallel system.
- Roughly 650 feet northwest of the intersection of Diana Avenue and Monroe Street, a fifteen-inch sewer relief trunk line drains parallel with the existing eight-inch sewer, connecting at the intersection of Magnolia Avenue.

The existing and planned sewer facilities within the core of the CBUSP Planning Area are shown in Figure 4.18-3.

Storm Water Drainage Facilities. See Section 4.9, Subsection 4.9.1, for a more detailed accounting of the existing storm drain system.

Solid Waste Services. RPW collects trash from seventy percent of all households, while the remaining waste is collected by a private collector (Burrtec Waste Industries). Burrtec Waste Industries (Burrtec) services approximately 20,000 customers in the La Sierra, University, and Orangecrest neighborhoods.[10] The CBU campus solid waste collection and disposal are provided by Burrtec. The company collects and disposes of CBU's landfill trash and mixed recyclables at the Agua Mansa Transfer Station and Material Recovery Facility, where trash remains until

[10] Public Facilities and Infrastructure Element, City of Riverside 2025 General Plan, amended November 2012.

being transferred to the to the Agua Mansa Landfill located at 1830 Agua Mansa Road in Colton.[11,12] The Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day.[13]

4.18.2 Related Regulations

Federal Regulations

Clean Water Act. In 1972 Congress amended the Federal Water Pollution Control Act, making the addition of pollutants to the waters of the United States from any point source unlawful unless the discharge is in compliance with a NPDES permit. Known today as the Clean Water Act (CWA), Congress has amended it several times. The objective of the CWA is "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." In the 1987 amendments, Congress directed dischargers of storm water from municipal and industrial/construction point sources to comply with the NPDES permit scheme. Important CWA sections are:

- Sections 303 and 304 require states to promulgate water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for a federal license or permit to conduct any activity, which may result in a discharge to waters of the U.S., to obtain certification from the state that the discharge will comply with other provisions of the act. (Most frequently required in tandem with a Section 404 permit request.)
- Section 402 establishes the NPDES, a permitting system for the discharges (except for dredge or fill material) of any pollutant into waters of the U.S. RWQCBs administer this permitting program in California.
- Section 402(p) requires permits for discharges of storm water from industrial/construction and Municipal Separate Storm Sewer Systems (MS4s).
- Section 404 establishes a permit program for the discharge of dredge or fill material into waters of the United States. This permit program is administered by the USACE.

EPA regulations require NPDES permits for discharges of storm water from industrial/ construction and MS4s. To comply with the permits, storm water pollution controls must be implemented for construction and industrial activity that discharges either directly to surface waters or indirectly through separate municipal storm drains. Pollution control is achieved by

[11] Personal Phone Call with Riverside Transfer Center.
[12] (Burrtec, n.d.)
[13] CalRecycle, Facility/Site Summary Details: Agua Mansa Landfill (36-AA-0019). http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0019/Detail/. (Accessed February 16, 2018).

establishing engineering measures that have been designed, tested, and successfully implemented throughout the past decades, such as detention basins and sediment traps, during both the construction period and the operational phases of a project. In California, the RWQCBs administer the NPDES permitting program.

Federal Water Pollution Control Act The major piece of federal legislation dealing with wastewater is the Federal Water Pollution Control Act, which is designed to restore and preserve the integrity of the nation's waters. In addition to the Federal Water Pollution Control Act, other federal environmental laws have a bearing on the location, type, planning, and funding of wastewater treatment facilities.

State Regulations

Urban Water Management Planning Act (California Water Code Section 10631). Since 1984, the Urban Water Management Planning Act has required urban water suppliers to develop written "urban water management plans" that encourage conservation and water projects for long term needs. Urban water management plans must include:

- Existing and planned water supply and demand;
- Water conservation measures;
- A schedule for implementing and evaluating such measures; and
- Water shortage contingency measures.

The Urban Water Management Planning Act requires that urban water suppliers use a 20-year planning horizon and update the data in the urban water plans every five years. In preparing their 20-year management plans, water suppliers must address the subject of future population growth directly. The suppliers must also identify sources of supply to meet demand. The plan must "identify and quantify, to the extent practicable, the existing and planned sources of water available to the supplier." In identifying these future water sources, the suppliers need not conduct environmental review.

Water Supply and Demand Reliability Assessment (Senate Bill 901). Signed into law on October 16, 1995, Senate Bill 901 (SB 901) requires every urban water supplier to identify as part of its UWMP the existing and planned sources of water available to the supplier over a prescribed five-year period. SB 901 requires additional information to be included as part of a UWMP if groundwater is identified as a source of water available to the supplier. Provisions of SB 901 requires an urban water supplier to include in the plan a description of all water supply projects and programs that may be undertaken to meet total project water use. A city or county shall request each public water system serving a project to assess the projected water demand

associated with said project and an assessment of whether the projected water demand associated with selected projects was included as part of the most recent UWMP. As part of this assessment, the public water system is required to indicate whether its total projected water supplies available during normal, single-dry, and multiple-dry water years will meet the project demand associated with the proposed Project, in addition to the public water system's existing and planned uses.

Pursuant to Section 10912 of the State Water Code, a "project" is specifically defined as development meeting any of the following criteria:

- 500 or more dwelling units;[14]
- Commercial center employing more than 1,000 persons or having more than 500,000 square feet;
- Office building employing more than 1,000 persons or having more than 250,000 square feet;
- A hotel/motel with 500 or more rooms;
- An industrial, manufacturing, processing plant, or industrial park employing more than 1,000 persons or occupying more than 40 acres, or having more than 650,000 square feet of floor area;
- A mixed-use project that would demand an amount of water equal to the amount of water required by a 500-dwelling unit project; or
- In areas where the public water system has fewer than 5,000 service connections, any development that would increase water demand by 10 percent or greater in the number of existing service connections, or in the case of a mixed-use development, an increase in water required by residential development representing a 10 percent or greater increase in the number of existing service connections.

After receiving such information, cities and counties may agree or disagree with the conclusions of the water purveyors, but cannot approve projects in the face of documented water shortfalls without first making certain findings.

SB 610, Water Supply Assessment. Enacted in 2001 (effective January 1, 2002), SB 610 added section 21151.9 to the Public Resources Code requiring that any proposed "Project," as defined in section 10912 of the Water Code, comply with Water Code section 10910, et seq. 53 Commonly referred to as a "SB 610 Water Supply Assessment," Water Code section 10910 et seq. outlines the necessary information and analysis that must be included in an environmental

[14] According to RPU, 500 dwelling units demand approximately 435 acre-feet of water per year.

impact report (EIR) to ensure that a proposed land development has a sufficient water supply to meet existing and planned water demands over a 20-year projection.

The standard for the certainty and reliability of water supplies sufficient to meet the demands of the proposed development is more exacting then that required for the Urban Water Management Plan (UWMP). Ultimately, because the SB 610 WSA is a source document for an EIR prepared for a proposed project pursuant to California Environmental Quality Act (CEQA), it must provide substantial evidence showing that sufficient water will be available to meet water demands for the water purveyor's existing and planned land uses over a 20-year planning horizon.

The initial question in conducting an SB 610 WSA is whether there is a "project" that is subject to the SB 610 WSA process. According to the SB 610 WSA requirements, a "project" is defined as any of the following:

- Residential development of more than 500 dwelling units;
- Shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotel or motel, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plan, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use project that includes one or more of the projects specified above;
- Project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

If a public water system has fewer than 5,000 service connections, then "project" means any proposed residential, business, commercial, hotel or motel, or industrial development that would account for an increase of 10 percent or more in the number of the public water system's existing service connections, or a mixed-use project that would demand an amount of water equivalent to, or greater than, the amount of water required by residential development that would represent an increase of 10 percent or more in the number of the public water system's existing service connections.

California Integrated Waste Management Act (CIWM) of 1989. The California Integrated Waste Management (CIWM) Act of 1989 was enacted through Assembly Bill (AB) 939 as a result of a national crisis in landfill capacity. AB 939 mandated local jurisdictions to meet waste diversion goals of 25 percent by 1995 and 50 percent by 2000, and established an integrated framework for program implementation, solid waste planning, and solid waste facility and landfill compliance. Other elements included encouraging resource conservation and considering the effects of waste management operations. The diversion goals and program requirements are implemented through a disposal-based reporting system by local jurisdictions under CIWMB regulatory oversight. Since the adoption of AB 939, landfill capacity has increased. Regional capacity problems exist, but capacity is no longer considered the statewide crisis it once was. AB 939 has achieved substantial progress in waste diversion, program implementation, solid waste planning, and protection of public health and safety and the environment from the operation of landfills and solid waste facilities.[15]

Solid Waste Reuse and Recycling Access Act of 1991 (AB 1327). Signed into law in 1991, AB 1327 added Chapter 18 to Part 3 of Division 30 of the Public Resources Code. Chapter 18 required the California Integrated Waste Management Board (CIWMB) to develop a model ordinance for adoption of recyclable materials in development projects. Local agencies were then required to adopt the model, or ordinances of their own, in order to govern adequate areas for collection and loading of recyclable materials in development projects by September 1, 1993. If a local agency had not adopted a model ordinance by that date, the CIWMB model would be adopted and enforced by the local agency.

Assembly Bill 75. The State Agency Model Integrated Waste Management Act (Chapter 764, Statutes of 1999, Strom-Martin) was enacted through AB 75 (passed in 1999) and took effect on January 1, 2000. This bill added new provisions to the PRC, mandating that State agencies develop and implement an Integrated Waste Management Plan (IWMP) that outlines the steps to be taken to achieve the required waste diversion goals.

Current statutes require all State agencies and large facilities to divert at least 50 percent of their solid waste from disposal facilities on and after January 1, 2004. The law also requires that each State agency and large facility submit an annual report to CalRecycle summarizing its yearly progress in implementing waste diversion programs; it also mandated that community service districts providing solid waste services report disposal and diversion information to the city, county, or regional agency in whose jurisdiction they are located. In addition to the waste

[15] AB 939 in the New Millennium. http://www.calrecycle.ca.gov/Archive/21stCentury/Events/FutureMar99/issues1.htm. (Accessed February 18, 2014).

diversion goals, all State agencies are required to buy recycled materials from 12 different categories ranging from paper and plastic to paint, solvents, and lubricating oils.

SB 1374. Senate Bill (SB) 1374 requires that the annual report submitted to CalRecycle (formerly known as the California Integrated Waste Management Board [CIWMB]) include a summary of the progress made in the diversion of construction and demolition waste materials. In addition, SB 1374 requires CalRecycle to adopt a model ordinance suitable for adoption by any local agency to require 50 to 75 percent diversion of construction and demolition waste materials from landfills by March 1, 2004. Local jurisdictions are not required to adopt their own construction and demolition ordinances, nor are they required to adopt CalRecycle's model by default. However, adoption of such an ordinance may be considered by CalRecycle when determining whether to impose a fine on a jurisdiction that has failed to implement its Source Reduction and Recycling Element (SRRE).

Assembly Bill 341. AB 341, enacted in 2011, changed the due date of the State agency waste management annual report to May 1 beginning in 2012. The bill makes a legislative declaration that is the policy goal of the State of California that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by 2020.

Local Regulations

City of Riverside General Plan 2025. The Public Facilities Element of the City's General Plan 2025 establishes objectives for water supply, wastewater service, and solid waste. Each objective is supported by a series of policies; those policies relevant to the proposed Project are listed below.

Objective PF-1: Provide superior water service to customers.

Policy PF-1.1:	Coordinate the demands of new development with the capacity of the water system.
Policy PF-1.3:	Continue to require that new development fund fair-share costs associated with the provision of water service.
Policy PF-1.4:	Ensure the provision of water services consistent with the growth planned for the General Plan area, including the Sphere of Influence, working with other providers.
Policy PF-1.7:	Protect local groundwater resources from localized and regional contamination sources such as septic tanks, underground storage tanks, industrial businesses and urban runoff.

Objective PF-3: Maintain sufficient levels of wastewater service throughout the community.

Policy PF-3.1: Coordinate the demands of new development with the capacity of the wastewater system.

Policy PF-3.2: Continue to require that new development fund fair-share costs associated with the provision of wastewater service.

Policy PF-3.3: Pursue improvements and upgrades to the City's wastewater collection facilities consistent with current master plans and the City's Capital Improvement Program.

Policy PF-3.4: Continue to investigate and carry out cost-effective methods for reducing storm water flows into the wastewater system and the Santa Ana River.

Objective PF-4: Provide sufficient levels of storm drainage service to protect the community from flood hazards and minimize the discharge of materials into the storm drain system that are toxic or which would obstruct flows.

Policy PF-4.1: Continue to fund and undertake storm drain improvement projects as identified in the City of Riverside Capital Improvement Plan.

Policy PF-4.2: Continue to cooperate in regional programs to implement the National Pollutant Discharge Elimination System program.

Policy PF-4.3 Continue to routinely monitor and evaluate the effectiveness of the storm drain system and make adjustments as needed.

Objective PF-5: Minimize the volume of waste materials entering regional landfills.

Policy PF-5.1: Develop innovative methods and strategies to reduce the amount of waste materials entering landfills. The City should aim to achieve 100% recycling citywide for both residential and non-residential development.

Riverside Municipal Code. The Riverside Municipal Code was established to protect the public's health, safety and quality of life. There are seven chapters of the Riverside Municipal Code that concern the provision of utilities in the City of Riverside, each listed below.

Chapter 3.14 Utility User's Tax. This chapter outlines taxes assigned to telephone, electricity, gas, water, and cable users in the City.

Chapter 6.04	Solid Waste and Recyclable Material. This chapter requires every owner, tenant, lessee or occupant of any premises where solid waste is generated to provide sufficient standard containers for receiving and holding all solid waste generated on the premises, and it establishes requirements for storage and removal.
Chapter 6.05	Development Project Areas for Collection and Loading of Recyclable Materials. Pursuant to the California Solid Waste and Recycling Access Act of 1991, this chapter outlines steps for the diversion of solid waste and recyclable materials from development project sites
Chapter 14.04	Sewer Service Charges. This chapter describes the billing and payment for premises being served by the City's sewerage system.
Chapter 14.28	Mandatory Use of Recycled Water. This chapter dictates when non-potable water must be used.
Chapter 18.70	Drainage and Sanitary Sewer Fees. This section of the Municipal Code requires the payment of fees for the construction of drainage facilities as a condition of the division of land. Whenever land that is proposed to be divided lies within the boundaries of an area drainage plan, adopted by resolution of the City Council, a drainage fee in the amount set forth in the adopted plan shall be paid as a condition of approval of the filing of a final map or parcel map, or as a condition of the waiver of the filing of a parcel map.
Chapter 19.57	Water Efficient Landscaping and Irrigation. The Water Efficient Landscaping and Irrigation Ordinance outlines landscaping requirements to promote the conservation and efficient use of water. An applicant proposing any new or rehabilitated landscape in the City is required to prepare and submit an application, including a planting plan, irrigation plan, and soils management plan to the Planning Division for review and approval.

4.18.3 Thresholds of Significance

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a project may result in significant impacts. Based on Appendix G, the proposed Project could have a significant impact on utilities if it would:

- (Threshold A) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board;

- (Threshold B) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- (Threshold C) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects;
- (Threshold D) Have sufficient water supplies available to serve the Project from existing entitlements and resources, or are new expanded entitlements needed;
- (Threshold E) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments;
- (Threshold F) Be served by a landfill with sufficient permitted capacity to accommodate the Project's solid waste disposal needs; and
- (Threshold G) Comply with federal, state, and local statutes and regulations related to solid waste?

Methodology

Water Supply. An Urban Water Management Plan (2015) was prepared for the Riverside Public Utilities Water Division by the Water Systems Consulting, Inc. Projected water demand for CBU was based on the increase in student population. CBU's water needs are currently met by two on-site wells and City supplies. CBU estimates that their wells supply approximately 85 percent of the non-potable water demand for landscaping, lawns, and athletic fields. Potable water is provided to CBU by City supplies. Potable water demand was evaluated against available water supplies for normal, single-dry, and multiple-dry years during a 25-year projection.

Storm Water Drainage. The storm water drainage is based on evaluating the existing and proposed storm water drainage facilities identified in the CBUSP Amendment. A Storm Water Pollution Prevention Plan (SWPPP) is required to be prepared before the issuance of any grading permit for new and future development within the CBU campus, as required by the NPDES.

Wastewater. Wastewater service is based on evaluating the existing capacity of nearby wastewater facilities that serve the City, future wastewater capacity that would be available to the City, and identification of existing and future wastewater demand associated with buildout of the CBUSP Amendment. Also identified are City goals and policies that the City implements to reduce generated wastewater.

Solid Waste. The solid waste analysis is based on evaluating the existing capacity of nearby landfills that serve the City, future solid waste capacity that would be available to the City, and the identification of existing solid waste demand and future solid waste demand associated with the development of the proposed Project. The analysis also identifies existing City goals, and policies that the City implements to reduce generated waste.

4.18.4 Project Design Features

Project design features refer to ways in which a project will reduce or avoid potential impacts through project design. The proposed CBUSP Amendment outlines design elements that guide development to have sufficient water, wastewater, storm drainage facilities, and solid waste collection.

Water. The Project site currently has two on-site wells which are strictly used for non-potable uses. The Project site is currently developed with existing water facilities including: a 12-inch line on Magnolia Avenue; 6-inch line and 12-inch line on Adams Street; 8-inch line and a 6-inch line on Diana Avenue; and 6-inch line on Monroe Street. To meet University growth and supply all planned facilities, improvements to internal campus water systems were previously constructed. An 8-inch water line will be extended from Lancer Lane along the realignment of the primary access roadway (Campus Bridge Drive) to the existing water system in Adams Street to provide a loop system. Local service connections to the buildings which are to be constructed as part of the campus extension, will branch off the existing or proposed water line mains.

Stormwater. The Project site is currently developed with approximately ninety percent impermeable surfaces, including parking lots, sidewalk, and roofs. Drainage facilities currently exist throughout the Project site. Surface runoff from the site currently drains into the three mainline drainage facilities serving the CBU campus. These three drainage facilities are as follows:

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

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

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

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

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

Additionally, the existing on-site basin will continue to retain projected increased runoff associated with the proposed Project while maintaining outflow to public storm drain systems at levels established by the RPW. Increased flows to the on-site basin will meet current water quality basin standards and will improve the pollutants removal efficiency and storm water mitigation based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

Wastewater. The CBUSP Amendment includes the abandonment of the existing sewer distribution line that runs under the East Parking Structure (currently under construction) and replacement with an 8 inch sewer distribution line. The abandoned and new sewer distribution lines are shown in previously referenced Figure 4.18-3. The new sewer distribution line would work in conjunction with existing sewer trunk and distribution lines to adequately convey sewer flows northerly, ultimately to the 15 inch sewer in Monroe Street north of Magnolia Avenue. These existing sewer lines include:

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

Approximately 650 feet northwest of the intersection of Diana Avenue and Monroe Street, a fifteen-inch sewer relief trunk line drains parallel with the existing eight-inch sewer, connecting at the intersection of Magnolia Avenue.[16]

The existing 8-inch sewer line in Magnolia Avenue does not have capacity to serve the entire future development of the campus. Because of this reason, flows will be directed to existing sewer lines in Adams Street, Diana Avenue, and Monroe Street to relieve flows directed to Magnolia Avenue. Proposed sewer lines include a 10-inch sewer to connect with the existing 12-inch sewer line in Monroe Street. The Events Center is served by an existing sewer line in Carney Lane to Monroe with no sewer pump.

Solid Waste. Solid waste collection and disposal are provided by private contractors. The University will continue to contract privately to meet its waste disposal needs and to ensure it complies with all regulations regarding waste diversion (recycling). During future development within the CBU campus, all solid waste generated from the CBU campus (such as plastic, glass, bottles, and jars, paper newspaper, metal containers, and cardboard) would be recycled to the greatest extent possible. Collection areas for dormitories and other on-campus multiple-unit residences will be provided inside buildings on each level (at a minimum), and central collection enclosure areas will be provided adjacent to (or within) exterior trash collection enclosures. Additionally, CBU will develop and implement a construction waste management plan for each construction project consistent with the City's waste stream diversion requirements.

4.18.5 Environmental Impacts Before Mitigation

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

Local governments and water districts are responsible for complying with federal regulations, both for wastewater plant operation and the collection systems (e.g., sanitary sewers) that convey wastewater to the wastewater treatment facility. Proper operation and maintenance is critical for sewage collection and treatment as impacts from these processes can degrade water resources and affect human health. For these reasons, publicly owned treatment works (POTWs) receive Waste Discharge Requirements (WDRs) to ensure that such wastewater facilities operate in compliance with water quality regulations set forth by the State. Waste Discharge Requirements (WDRs), issued by the State, establish effluent limits on the kinds and quantities of pollutants that POTWs can discharge. These permits also contain pollutant monitoring, recordkeeping, and

[17] Public Facilities and Infrastructure Element, City of Riverside 2025 General Plan. November 2007, Amended November 2012.

reporting requirements. POTWs that intend to discharge into the nation's waters must obtain a WDR prior to initiating discharge.

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

In 2005, the RWQCP treated almost 33 million gallons of sewage per day for 280,000 residents of Riverside and other served communities.[17] In 2005, the plant had a max design capacity of 40 million gallons per day, which is expected to be reached not before 2025. Currently, the RWQCP has a max design capacity of 46 million gallons per day (mgd), and is currently treating approximately 27.2 mgd;[18] therefore, having approximately 18.8 mgd of capacity in surplus. According to the City of Riverside *2025 General Plan*, "The City has adequate planned capacity to meet the wastewater treatment needs of all future Riverside residents and businesses. Compliance with condition or permit requirements established by the City, and waste discharge requirements at the RPW would ensure that discharges into the wastewater treatment facility system from the operation of the proposed Project would not exceed applicable wastewater treatment requirements. As discussed below is Section 4.18.6.5 expected wastewater flows from the proposed Project will not exceed the capabilities of the serving treatment plant; therefore, the proposed Project will have a **less than significant impact** on a wastewater treatment plant. No mitigation is required.

Threshold B: Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Water Supply Facilities

The Project site lies within the RPU service area. RPU's water supply consists primarily of groundwater from the Bunker Hill Basin, Rialto-Colton, Arlington, Riverside North, and Riverside South sub-basins and is conveyed to RPU's potable or non-potable distribution system.

[17] Public Facilities and Infrastructure Element, City of Riverside 2025 General Plan. November 2007, Amended November 2012.

[18] Personal Phone Call with Robert Eland, Wastewater Analyst, September 5, 2017.

The western portion of the CBU campus is within the Arlington water basin while the remainder of the CBU campus is within the Riverside south water basin.[19] As of 2015, RPU's pumping capacity totals approximately 46,540 gallons per minute (gpm) with individual well production ranging from approximately 746 gpm to 33,330 gpm. As of 2015, the pumping capacity for each basin is as follows:

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

Existing water facilities throughout the campus include: 12-inch line on Magnolia Avenue; 6-inch line and 12-inch line on Adams Street; 8-inch line and 6-inch line on Diana Avenue; and 6-inch line on Monroe Street. Additionally, depending when approved, RPU has a 24-inch recycled water line in Monroe Street that is currently under construction. The campus water distribution lines are owned and maintained by the City and range in size from 3 to 12 inches. The CBU campus ties into these City main lines.

With the connection to the existing water lines as well as new water lines to be built as building occurs, this would ensure that water services to the site would meet the demand of all new future development. Proposed infrastructure improvement would need approval of RPU.

With the connection of the existing facilities, the construction of new expanded water treatment facilities would be required. As a result, the installation of water facilities during future Project construction phase would not create a significant environmental effect that are not already identified and disclosed as part of this EIR.

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

Based on water usage reported by RPU, CBU demanded 6,850,700 cubic feet (157.27 acre-feet) of water from November 2016 through July 2017.[20] Projected over a 12-month period, CBU currently demands approximately 9,134,267 cubic feet (209.70 acre-feet) (68,329,062 gallons) of

[19] Figure PF-1.1, City of Riverside 2025 General Plan, Public Facilities and Infrastructure Element, amended November 2012.

[20] *Water Demand Calculation for the California Baptist University Specific Plan Amendment.* Rick Engineering Company. August 30, 2017.

water per year assuming a current student enrollment of 8,773.[21] Therefore, the projected increase in student enrollment of 3,227 would generate an additional 3,358,471 cubic feet (77.1 acre-feet) (25,123,108 gallons) of water per year, or 9,201.3 cubic feet (68,830.5 gallons) of water per day.[22] Combined with existing demand, CBU is expected to demand 12,492,738 cubic feet (286.80 acre-feet) (93,452,170 gallons) of water per year at buildout of the Specific Plan.[23]

As detailed in Tables 4.18.E through 4.18.G above, RPU would have a reliable and sufficient water supply that would exceed projected demand through the year 2040.[24] RPU and the RPW conjointly manage and plan wastewater and recycled water operations and programs, and the anticipated additional water demand of 25,123,108 gallons of water per year, or 68,830.5 gallons of water per day would constitute potable water to be used for both drinking as well as sanitary needs resulting in wastewater. As a worst case scenario, even if all anticipated water demand were used for sanitary needs resulting in wastewater, the proposed project would generate an additional 68,830.5 gallons of wastewater per day.

Wastewater Facilities

The RWQCP maintains a surplus wastewater treatment capacity of 18.8 mgd, so the CBUSP Amendment would not require the construction of new water or wastewater treatment facilities or expansion of existing facilities, which could cause significant environmental effects.

As shown in Figure 4.18-3, the CBUSP Amendment proposes the abandonment of the existing private sewer distribution line that runs under the East Parking Structure and replacement with an 8 inch sewer distribution line.

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

Carney Lane to Monroe Street

- The anticipated 2025 peak daytime sewer flows in Carney Lane's sewer are generated by the Events Center and minor daytime uses in Lancer Arms, Smith Hall/Simmons Hall,

[21] 157.27 ÷ 9 months = 17.474 acre-feet per month × 12 months = 209.7 acre feet per year ÷ 8,773 students = 0.0239 acre feet per capita per year.

[22] Total student growth of 3,227 × 0.0239 acre feet per capita per year = 3,358,471 cubic feet (77.1 acre-feet) of additional water per year ÷ 365 days per year = 9,201.3 cubic feet of water per day.

[23] 2016-2017 demand of 9,134,267 cubic feet + 3,358,471 cubic feet additional demand from implementation of the Specific Plan Amendment = 12,492,738 cubic feet of water demand at buildout.

[24] *2015 Urban Water Management Plan*. Page 8-5. Riverside Public Utilities Water Division. June 2016

and the proposed 1,000 beds South Campus Housing development and is approximately 307 gpm.

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

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

Campus Bridge Drive to Magnolia Avenue

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

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

Miscellaneous Other Campus Sewer Outflows

- Adams Street – Tower Hall student housing 4 gpm daytime, 30 gpm evening.
- Adams St – The Village student housing 4 gpm daytime, 33 gpm evening.
- Adams St – The Point student housing 4 gpm daytime, 24 gpm evening.
- Adams St – School of Nursing 20 gpm daytime, negligible evening.
- Adams St – 3739 Adams St 20 gpm daytime, negligible evening.
- Adams St – School of Nursing 20 gpm daytime, negligible evening.
- Magnolia Ave – University Place (UP's) student housing 4 gpm daytime, 44 gpm evening.
- Magnolia Ave – The Colony student housing 11 gpm daytime, 116 gpm evening.
- Monroe St – Health Science Campus 45 gpm daytime, gpm GPM evening.

As summarized above, the findings from the Sewer Capacity Study prepared for the CBUSP Amendment confirm that adequate capacity exists in all trunk lines to accommodate transmission demands associated with build-out of the Specific Plan. The study also confirmed that the sewer distribution plan summarized in Section 4.18-4 including the new sewer distribution line would adequately convey flows to the trunk lines and no other expanded or new sewer facilities would be required.[25]

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

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

Threshold C: Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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

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

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

[25] *2025 Sewer Capacity Study for California Baptist University Amendment.* Rick Engineering Company. August 8, 2018.

Amendment would be directed to the existing Magnolia Basin. University owned storm drain facilities on the campus range in size from 6 to 42 inches.

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

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

As new development occurs, localized storm drains will be constructed and connected to existing storm drain systems that flow to the on-site basin (see Figures 2-7 and 4.9-1). The existing drainage patterns will be maintained throughout the campus to reduce the potential for diversion of flows. The existing 30-inch storm drain along Lancer Lane will be extended to provide drainage facilities for the realigned primary vehicular roadway.[26]

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

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

[26] *California Baptist University Specific Plan, Public Review Draft*. Chapter 3: Development Plan, Section F. Drainage System, Subsection 1. Storm Drains. City of Riverside. August 2018.

project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations.

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

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

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

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

As stated previously, CBU's water needs are currently met by two on-site wells and City supplies. CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields. Potable water is provided to CBU by City supplies. Based on water usage reported by RPU, CBU demanded 6,850,700 cubic feet (157.27

acre-feet) of water from November 2016 through July 2017.[27] Projected over a 12-month period, CBU currently demands approximately 9,134,267 cubic feet (209.70 acre-feet) (68,329,062 gallons) of water per year assuming a current student enrollment of 8,773.[28] Therefore, the projected increase in student enrollment of 3,227 would generate an additional 3,358,471 cubic feet (77.1 acre-feet) (25,123,108 gallons) of water per year, or 9,201.3 cubic feet (68,830.5 gallons) of water per day.[29] Combined with existing demand, CBU is expected to demand 12,492,738 cubic feet (286.80 acre-feet) (93,452,170 gallons) of water per year at buildout of the Specific Plan.[30]

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

Threshold E: Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

The Riverside Public Works Department operates a comprehensive wastewater collection, treatment and disposal system that serves most of the City. The proposed Project wastewater would be treated at the Riverside Regional Water Quality Control Plant (RWQCP) located at 5950 Acorn Street approximately 2.3 miles northwest of the CBU campus. In 2005, the RWQCP treated almost 33 mgd of sewage for 280,000 residents of Riverside and other communities. As stated previously, RPU and the RPW conjointly manage and plan wastewater and recycled water operations and programs, and the anticipated additional water demand of 25,123,108 gallons of water per year, or 68,830.5 gallons of water per day would constitute potable water to be used for both drinking as well as sanitary needs resulting in wastewater. As a worst case scenario, even if

[27] *Water Demand Calculation for the California Baptist University Specific Plan Amendment.* Rick Engineering Company. August 30, 2017.

[28] 157.27 ÷ 9 months = 17.474 acre-feet per month × 12 months = 209.7 acre feet per year ÷ 8,773 students = 0.0239 acre feet per capita per year.

[29] Total student growth of 3,227 × 0.0239 acre feet per capita per year = 3,358,471 cubic feet (77.1 acre-feet) of additional water per year ÷ 365 days per year = 9,201.3 cubic feet of water per day.

[30] 2016-2017 demand of 9,134,267 cubic feet + 3,358,471 cubic feet additional demand from implementation of the Specific Plan Amendment = 12,492,738 cubic feet of water demand at buildout.

all anticipated water demand were used for sanitary needs resulting in wastewater, the proposed project would generate an additional 68,830.5 gallons of wastewater per day.

Regional Water Recycling Plant Wastewater design hydraulic domestic sewage treatment capacity for the RWQCP is 46 million gpd.[31] The plant treats an average influent wastewater flow of approximately 27.2 million gpd,[32] leaving a surplus capacity of approximately 18.8 million gpd. The CBUSP Amendment would increase wastewater at the RWQCP by 0.25 percent, incrementally increasing demand for wastewater treatment.[33] Therefore, the proposed Project would have a **less than significant impact** to wastewater treatment. No mitigation is required.

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

As discussed in Section 4.18.1, the Project site is serviced by Burrtec Waste Industries for solid waste pickup and removal. Solid waste is transported to the Agua Mansa Landfill located at 1830 Agua Mansa Road in Colton.[34] The Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day.[35]

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

As stated above, all non-hazardous solid waste generated from the Project site (such as plastic and glass bottles and jars, paper, newspaper, metal containers, and cardboard) would be recycled per local and state regulations mentioned above, in compliance with the California Integrated Waste Management Act. Remaining non-hazardous solid waste would be disposed of at the Agua Mansa Landfill. Hazardous waste is managed and disposed of in compliance with all applicable federal, state, and local laws and is discussed in greater detail in Section 4.6, *Hazards and Hazardous Materials*. Public Resource Code (PRC) Section 41780 requires every city and county in the State to divert from landfills at least 50 percent of the quantity of waste generated

[31] *2015 Urban Water Management Plan*. Page 7-7. Riverside Public Utilities Water Division. June 2016
[32] Personal Phone Call with Robert Eland, Wastewater Analyst, September 5, 2017.
[33] 68,830.5 gallons of additional wastewater per day (worst case scenario) ÷ 27,200,000 gallons wastewater treatment per day = 0.25 percent contribution to daily treatment.
[34] Personal Phone Call with Riverside Transfer Center.
[35] CalRecycle, Facility/Site Summary Details: Agua Mansa Landfill (36-AA-0019).

within their jurisdiction in 2000.[36] In 2004, the City's waste diversion rate was 60 percent, in compliance with PRC Section 41780.

In 2016, each resident had a disposal rate of 6.0 pounds per resident per day, with a recycling rate of 44 percent.[37] For the 2016-2017 school year, approximately 8,773 students are attending the University. Assuming the rate of 6.0 pounds per resident per day, the University is currently generating 52,638 pounds per day or 192 million pounds per year. The additional 3,227 students and 190 faculty/staff would add an additional disposal rate of approximately 20,502 pounds or 10.3 tons per day. Assuming the Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day, the proposed project would demand approximately 0.0000076 percent of the Agua Mansa surplus capacity. Future development within the CBUSP Amendment would contribute to Development Impact Fees (DIF) to contribute funding for expansion of solid waste facilities. Therefore, the amount of solid waste generated and disposed of in the Agua Mansa Landfill during operation of the Project is expected to be within the permitted capacity of the landfill. The proposed Project would have a **less than significant impact** related to solid waste No mitigation is required.

Threshold G: Comply with federal, state, and local statutes and regulation related to solid waste?

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

[36] *City of Riverside 2025 General Plan EIR*, certified November 2007.
[37] CalRecycle, California's 2016 Per Capita Disposal Rate Estimate. http://www.calrecycle.ca.gov/lgcentral/goalmeasure/DisposalRate/MostRecent/default.htm, accessed August 31, 2017.

and regulations related to solid waste during construction and operation of all new development, impacts would be **less than significant**. No mitigation measures are required.

4.18.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to utilities have been found to be potentially significant, no mitigation measures are required. Adherence to standard procedures, including applicable objectives and policies of the CBUSP Amendment, *Riverside General Plan 2025*, and Riverside Municipal Code, in addition to compliance with regulatory standards, will ensure all impacts related to utilities are less than significant.

4.18.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates that the Project will not exceed significance criteria for utilities impacts. Therefore, all utilities impacts are **less than significant**, and no mitigation measures are required.

4.18.8 References

14 CCR 15000–15387 and Appendix A–L. Guidelines for Implementation of the California Environmental Quality Act, as amended.

Burrtec. (n.d.). Landfill / Transfer. http://www.burrtec.com/landfill. (Accessed August 30, 2017).

CalRecycle, Facility/Site Summary Details: Agua Mansa Landfill (36-AA-0019). http://www.calrecycle.ca.gov/SWFacilities/Directory/36-AA-0019/Detail/. (Accessed February 16, 2018).

City of Riverside. *California Baptist University Specific Plan, Public Review Draft.* August 2018.

City of Riverside. *City of Riverside General Plan 2025*. November 2007.

City of Riverside, *City of Riverside General Plan 2025 and Supporting Documents Final Program Environmental Impact Report*. December 2007.

City of Riverside. *Initial Study and Mitigated Negative Declaration for the California Baptist University Specific Plan.* January 2012.

City of Riverside. (2015). City of Riverside Trash & Recycling. Accessed August 30, 2017, from City of Riverside.

City of Riverside. (2015). Innovation and Technology. https://www.riversideca.gov/it/FreeWi-fi/, (Accessed August 29, 2017).

City of Riverside. (2015). Sewer Division. Retrieved July 6, 2016. http://www.riversideca.gov/publicworks/sewer/. (Accessed August 30, 2017).

City of Riverside. *Wastewater Collection and Treatment Facilities Integrated Master Plan.* February 2008.

Rick Engineering Company. *2025 Sewer Capacity Study for California Baptist University.* August 8, 2018.

Rick Engineering Company. *Water Demand Calculation for the California Baptist University Specific Plan Amendment.* August 30, 2017.

Riverside Public Utilities Water Division. *2015 Urban Water Management Plan*. June 2016

Southern California Gas Company, List of Cities and Communities Served, website: https://www.socalgas.com/regulatory/tariffs/tm2/pdf/CITIES.pdf, August 30, 2017.

4.19 ENERGY CONSERVATION

Based on Appendix F of the State California Environmental Quality Act (CEQA) Guidelines, the focus of the following analysis addresses the Project's potential energy conservation impacts with implementation of the proposed Project. Appendix F requires environmental impacts reports (EIRs) to include a discussion of the potential energy impacts of projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. No comments regarding energy conservation were received in response to the NOP.

4.19.1 Setting

Energy sources are classified as non-renewable if they cannot be replenished in a short period of time. Therefore, non-renewable energy resources include fossil fuels. Fossil fuels, which consist of oil, coal, and natural gas and associated byproducts, provide the energy required for the vast majority of electricity generation at power plants and fuel for motorized vehicles. Thus, the discussion of energy conservation most relevant to the Project is focused on Project-generated electricity demand, natural gas demand, and transportation fuel demand.

Electricity

Electricity services are provided to the CBU campus by Riverside Public Utilities (RPU). The City is the primary distribution provider for electricity in the City and operates its own electrical utility. RPU was established in 1895, has a service area population of over 325,000 and operates approximately 100 miles of transmission lines and approximately 1,300 miles of distribution lines. As of 2015/2016, RPU had over 109,000 electrical meter connections and sold over 2,327,400 megawatt-hours of energy, with a peak power demand of over 604 megawatts (MG) of electricity (RPU 2017, 2017b, 2015).

Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity-consuming devices within a building. Because of the state's energy efficiency standards and efficiency and conservation programs, California's per-capita energy use has remained stable since the 1970s, while the national average has steadily increased. The Draft 2017 Integrated Energy Policy Report (IEPR) estimates that electricity consumption will grow by an average of 0.64 percent, 0.20 percent, and -0.22 percent per year, respectively, in the high, mid, and low demand scenarios, respectively, from 2016 to 2027.[1] According to the California Energy

[1] *Draft 2017 Integrated Energy Policy Report*. California Energy Commission. CEC-100-2017-001-CMD. 2017.

Commission (CEC), Riverside County consumed approximately 15.9 billion kilowatt hours (kWh) of electricity in 2016.[2]

As of 2016, RPU served 25 percent of its retail sales from renewable energy (geothermal, solar PV, wind), 24 percent from coal, 4 percent from nuclear, 3 percent from natural gas, 1 percent from large hydroelectric, and 47 percent from unspecified California Independent System Operator system power (2017b RPU). RPU currently has two major energy projects under development: 1) Magnolia-Plaza Reliability Project entails the relocation of an important energy transmission line and the improvement of the Plaza Substation facility which signifies the closure of the Magnolia Substation and 2) Riverside Transmission Reliability Project includes the construction of a new double-circuit 230 kilovolt (kV) transmission line, a new 230/69 kV electrical substation, and new 69 kV sub-transmission lines all of which will provide needed energy resources while improving service reliability for RPU customers. Additionally, RPU recently completed development of the Tequesquite Landfill Solar Project, a 7.5 MW solar power facility on a capped landfill within RPU's distribution service area.

RPU electrical facilities surround the CBU Specific Plan Zone. The CBU SP-1 subarea is served by underground distribution lines interconnected to overhead distribution circuits along Adams Street and Magnolia Avenue and a sub-transmission circuit with a distribution underbuild along Monroe Street. The CBU SP-2 subarea is generally served by these same circuits via a combination of overhead and underground service masts.

Natural Gas

Southern California Gas Company (SCG) provides natural gas service for residential, commercial, and industrial uses. Natural gas is a "fossil fuel," indicating that it comes from the ground, similar to other hydrocarbons such as coal or oil. SCG purchases natural gas from several bordering states. Interstate pipelines that currently serve California include: El Paso Natural Gas Company, Kern River Transmission Company, Mojave Pipeline Company, Gas Transmission- Northwest, Transwestern Pipeline Company, Southern Trails Pipeline, and Tuscarora Pipeline. Most of the major natural gas transmission pipelines within the City are owned and operated by SCG. The Public Utilities Commission (PUC) regulates SCG, who is the default provider required by State law, for natural gas delivery to the City. SCG has the capacity and resources to deliver gas except in certain situations that are noted in State law. As development occurs, SCG will continue to extend its service to accommodate development and supply the necessary gas lines. SCG does not base its service levels on the demands of the City; rather it makes periodic upgrades to provide service for particular projects and new development.

[2] *Electricity Consumption by County*. California Energy Commission. 2016. http://ecdms.energy.ca.gov/elecbycounty.aspx. (Accessed December 22, 2017).

SCG is continuously expanding its network of gas pipelines to meet the needs of new commercial and residential developments in Southern California.[3]

Major SCG facilities (i.e., greater than 60 pounds per square inch pipelines) in proximity to the CBU Specific Plan Zone are a high pressure distribution pipeline at the intersection of Adams Street and Lincoln Avenue approximately 0.6 mile south of the campus and a transmission pipeline along Arlington Avenue approximately 0.9 mile north of the campus.[4] Lower pressure distribution mains and smaller service lines connected to the gas meters within the CBU Specific Plan Zone interconnect to the larger SCG facilities within or adjacent to public roadways in order to serve the campus.

According to the Draft 2017 Integrated Energy Policy Report (IEPR), California will use approximately 13.25 to 13.5 billion therms of natural gas (excluding fuel for electricity generation) in 2017.[5] Natural gas consumption is expected to marginally increase by 2026, with an average growth rate of in consumption of 0.84 percent, 0.61 percent, and 0.57 percent in the high, mid, and low demand scenarios, respectively. According to the California Energy Commission (CEC), Riverside County consumed approximately 396 million therms of natural gas in 2016.[6] SCG produced approximately 5,123 million therms in 2016.

Petroleum

In California, petroleum fuels refined from crude oil are the dominant source of energy for transportation sources. As the dominant source of energy for transportation sources, California used approximately 570 million barrels of petroleum annually in 2016.[7] As the source of approximately 40% of the greenhouse gas (GHG) emissions in California, petroleum usage in California includes petroleum products such as motor gasoline, distillate fuel, liquefied petroleum gases, and jet fuel. Consumption of gasoline, diesel and jet fuel has declined in recent years due to the rise in fuel costs and improvements in engine efficiencies. Based on the Draft 2015 IEPR, due to the prevalence of petroleum projects in the transportation sector, the rise in costs of these fuels, the federal Renewable Fuel Standard (RFS), and the California low carbon

[3] *Section 5.16-Utilities and Service Systems.* City of Riverside General Plan and Supporting Documents Environmental Impact Report. Page 5.16-20. City of Riverside. November 2007.

[4] *Gas Transmission Pipeline Interactive Map - Riverside.* Southern California Gas Company. https://www.socalgas.com/stay-safe/pipeline-and-storage-safety/natural-gas-pipeline-map. (Accessed February 28, 2018).

[5] CEC, 2017, Figure 36.

[6] *Gas Consumption by County*. California Energy Commission. 2017. http://ecdms.energy.ca.gov/gasbycounty.aspx. (accessed December 27, 2017).

[7] *Draft 2017 Integrated Energy Policy Report.* California Energy Commission. CEC-100-2017-001-CMD, Figure 42. 2017.

fuel standard, California is diversifying its transportation fuel sources, increasing fuel efficiency and urban design to reduce the need for petroleum-based transportation.[8]

CBU Central Plant

A centralized heating and cooling facility known as the Central Plant (also known as a District Plant) serves the core academic and administrative areas of the CBU campus. The Central Plant and its adjacent cooling tower annex were recently upgraded (2018) to provide additional heating and cooling capacity to serve the recently constructed College of Engineering. A physical shell/structure expansion of the existing Central Plant building will not be required in the future to meet anticipated needs of the interior/core campus's physical environment. There is planned spare (pad/equipment) space to add additional equipment (i.e., space for chillers (2), pumps, upgraded/sized cooling towers, and boiler(s) to be added within the Central Plant building to serve future interior/core campus needs as buildout of the proposed CBU Specific Plan Amendment is approached. It is foreseen however, that similar central plant facilities (sometimes called Satellite Plants) may be required as part of development on the campus perimeter or outlier areas as development takes place and shall be reviewed in conjunction with implementing development applications.

4.19.2 Related Regulations

Federal Regulations

Energy Policy and Conservation Act. In 1975, Congress enacted the federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the United States.[9] Pursuant to the act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2010, fuel economy standards were set at 27.5 miles per gallon (mpg) for new passenger cars and 23.5 mpg for new light trucks. Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Independence and Security Act of 2007. On December 19, 2007, the Energy Independence and Security Act (EISA) of 2007 was signed into law.[10] In addition to setting increased corporate average fuel economy standards for motor vehicles, the act includes other provisions related to energy efficiency:

- Renewable fuel standard (Section 202)

[8] *Draft 2015 Integrated Energy Policy Report*. California Energy Commission. CEC-100-2011001-CMF, 2015.
[9] 42 U.S.C., sections 6201 et seq., 6400, 6421–6422, Energy Policy and Conservation Act (1975).
[10] U.S. 110th Congress, Public Law 140, Energy Independence and Security Act of 2007.

- Appliance and lighting efficiency standards (Sections 301–325)
- Building energy efficiency (Sections 411–441)

This federal legislation requires ever-increasing levels of renewable fuels to replace petroleum (Section 202, RFS). The U.S. Environmental Protection Agency (USEPA) is responsible for developing and implementing regulations to ensure that transportation fuel sold in the United States contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the United States.11 As required under the act, the original RFS program (RFS1) required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the 2007 EISA, the RFS program was expanded in several key ways that laid the foundation for achieving significant reductions of GHG emissions through the use of renewable fuels, for reducing imported petroleum, and for encouraging the development and expansion of our nation's renewable fuels sector. The updated program is referred to as RFS2 and includes the following:[12]

- EISA expanded the RFS program to include diesel, in addition to gasoline.
- EISA increased the volume of renewable fuel required to be blended into transportation fuel from 9 billion gallons in 2008 to 36 billion gallons by 2022.
- EISA established new categories of renewable fuel and set separate volume requirements for each one.
- EISA required the EPA to apply lifecycle GHG performance threshold standards to ensure that each category of renewable fuel emits fewer GHGs than the petroleum fuel it replaces.

Additional provisions of EISA address energy savings in government and public institutions, promoting research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."

State Regulations

California Energy Code. The California Energy Code (California Code of Regulations Title 24, Part 6), which is incorporated into the Building Energy Efficiency Standards, was first

11 U.S. 109th Congress, Public Law 58, Energy Policy Act of 2005.

12 *EPA, Transportation and Air Quality, Fuels and Fuel Additives*. U.S. Environmental Protection Agency, Renewable Fuel Standard (RFS). http://www.epa.gov/otaq/fuels/renewablefuels/. (Accessed on December 2, 2017).

established in 1978 in response to a legislative mandate to reduce California's energy consumption. The efficiency standards apply to new construction of both residential and nonresidential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in Title 24 guidelines. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

The 2016 Title 24 standards, which became effective on January 1, 2017, are estimated to result in new buildings that use 28 percent less energy for lighting, heating, cooling, ventilation, and water heating than the previous 2013 Standards. The 2016 updates to Title 24 are focused on moving closer to zero net energy (ZNE) homes by getting energy loads down so remaining electricity demand can be met by solar photovoltaic (PV) panels. The 2016 Title 24 standards require “solar-ready roofs” to accommodate future installations of solar PV panels. Additionally, the 2016 Title 24 standards will save millions of gallons of water per year.

California Green Building Standards Code. The purpose of the California Green Building Standards Code (California Code of Regulations Title 24, Part 11) is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts that either reduced negative environmental impact or enhance positive environmental impact. The Green Building Standards code encourages sustainable construction practices in the following categories: 1) planning and design; 2) energy efficiency; 3) water efficiency and conservation; 4) material conservation and resource efficiency; and 5) environmental quality. The California Green Building Standards, which became effective on January 1, 2011, instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial, low-rise residential uses, and state-owned buildings, as well as schools and hospitals.

Specific to energy conservation, the mandatory standards require inspections of energy systems to ensure optimal working efficiency. The voluntary standards require the following:

- **Tier I:** 15-percent improvement in energy requirements.
- **Tier II:** 30-percent improvement in energy requirements.

California Renewables Portfolio Standard. Senate Bill 1078 (SB 1078), which was enacted on September 12, 2002, established the Renewables Portfolio Standard program that requires retail sellers of electricity, including electrical corporations, community choice aggregators, and electric service providers, to purchase a specified minimum percentage of electricity generated by eligible renewable energy resources, such as wind, solar, geothermal, small hydroelectric,

biomass, anaerobic digestion, and landfill gas.[13] Senate Bill 107 (SB 107), which was enacted on September 26, 2006, accelerated the Renewables Portfolio Standard to require that at least 20 percent of electricity retail sales be served by renewable energy resources by year 2010.[14]

In response to Executive Order S-21-09 (described below), the Renewables Portfolio Standard was expanded in 2011 to require investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by the year 2020. The Renewables Portfolio Standard is included as a reduction measure in the California Air Resource Board's (ARB) Climate Change Scoping Plan. Increased use of renewable energy would decrease California's reliance on fossil fuels, thus reducing emissions of GHGs from the electricity sector. The ARB estimates that full achievement of the Renewables Portfolio Standard would decrease statewide GHG emissions by 21.3 million $MTCO_2e$.

Executive Order B-16-2012. Executive Order B-16-12 (issued March 23, 2012) directed state government to accelerate the market for zero-emission vehicles (ZEV) in California through fleet replacement and electric vehicle infrastructure. The Executive Order set the following targets:

- By 2015, all major cities in California will have adequate infrastructure and be "ZEV ready";
- By 2020, the state will have established adequate infrastructure to support 1 million ZEVs in California;
- By 2025, there will be 1.5 million ZEVs on the road in California; and
- By 2050, virtually all personal transportation in the State will be based on ZEVs, and greenhouse gas emissions from the transportation sector will be reduced by 80 percent below 1990 levels.

Executive Order S-14-08. Executive Order S-14-08 (issued November 17, 2008) directed several state agencies to expedite the process of creating renewable generation facilities and proposing to expand California's Renewables Portfolio Standard. The Governor's proposed Renewables Portfolio Standard of 33 percent renewable generation by 2020 would build on the SB 1078 target of producing 20 percent by 2010.

Executive Order S-21-09. Executive Order S-21-09 (issued September 15, 2009) required that the ARB, under its AB 32 authority, adopt a regulation consistent with the 33-percent renewable

[13] California Public Resources Code, sections 387, 390.1 399.11–399.25, California Renewables Portfolio Standards Program.

[14] Stats. 2006, ch. 464, Public Interest Energy Research, Demonstration, and Development Program.

energy target established in Executive Order S-14-08 by July 31, 2010. Under Executive Order S-21-09, the ARB is directed to work with the California Public Utilities Commission and California Energy Commission to encourage the creation and use of renewable energy sources. The ARB will consult with the Independent System Operator and other load-balancing authorities on, among other aspects, impacts on reliability, renewable integration requirements, and interactions with wholesale power markets in carrying out the provisions of Executive Order S-21-09. The ARB also will establish the highest priority for those resources that provide the greatest environmental benefits with the least environmental costs and impacts on public health; that can be developed most quickly; and that support reliable, efficient, cost-effective electricity system operations.

Senate Bill 350, Clean Energy and Pollution Reduction Act of 2015. Senate Bill 350 (issued October 7, 2015) builds upon EO S-14-08 by increasing the renewable energy target to 50 percent by 2030. In addition, SB 350 increases the energy efficiency in buildings by 50 percent by 2030.

Senate Bill 1368. On September 29, 2006, Governor Arnold Schwarzenegger signed into law Senate Bill 1368 (Perata, Chapter 598, Statutes of 2006).[15] The law limits long-term investments in baseload generation by the state's utilities to power plants that meet an emissions performance standard jointly established by the CEC and the California Public Utilities Commission. The CEC has designed regulations that:

- Establish a standard for baseload generation owned by or under long-term contract to publicly owned utilities, of 1,100 pounds of carbon dioxide (CO2) per megawatt-hour (MWh). This will encourage the development of power plants that meet California's growing energy needs while minimizing their emissions of GHGs.
- Require posting of notices of public deliberations by publicly owned utilities on long-term investments on the CEC website. This will facilitate public awareness of utility efforts to meet customer needs for energy over the long-term while meeting the state's standards for environmental impact.
- Establish a public process for determining the compliance of proposed investments with the EPS [emissions performance standard] (Perata, Chapter 598, Statutes of 2006).

Assembly Bill 1493. Adopted in 2002 by the state legislature, Assembly Bill 1493 ("Pavley" regulations) required that the California Air Resources Board (ARB) develop and adopt, no later than January 1, 2005, regulations to achieve the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles.

[15] Stats. 2006, ch. 598.

The first California request to implement GHG standards for passenger vehicles, known as a waiver request, was made in December 2005 and was denied by the USEPA in March 2008. That decision was based on a finding that California's request to reduce GHG emissions from passenger vehicles did not meet the Clean Air Act requirement of showing that the waiver was needed to meet "compelling and extraordinary conditions."

The USEPA granted California the authority to implement GHG emission reduction standards for new passenger cars, pickup trucks, and sport utility vehicles on June 30, 2009. On September 24, 2009, ARB adopted amendments to the Pavley regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016. These amendments are part of California's commitment to a nationwide program to reduce new passenger vehicle GHGs from 2012 through 2016. The ARB's September 2009 amendments will allow for California's enforcement of the Pavley rule, while providing vehicle manufacturers with new compliance flexibility. The amendments also prepare California to harmonize its rules with the federal rules for passenger vehicles.

It is expected that the Pavley regulations will reduce GHG emissions from California passenger vehicles by about 22 percent in 2012 and about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs. The ARB has adopted a new approach to passenger vehicles (cars and light trucks) by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California.[16]

Regional Regulations

Southern California Association of Governments. The Southern California Association of Governments (SCAG) functions as the Metropolitan Planning Organization (MPO) for six counties, including Riverside County, wherein the project area is located. As the designated MPO, SCAG is federally mandated to research and plan for transportation, growth management, hazardous waste management, and air quality. Although SCAG is not an energy management agency, it is responsible for several energy planning issues, as described below.

On May 8, 2012, the Regional Council of SCAG adopted the 2012 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the SCAG area. In July 2017, SCAG's Regional Council adopted the 2016 RTP/SCS Amendment #2 and the 2017 FTIP Consistency Amendment #17-07, including the associated transportation conformity determination. The

[16] California Air Resources Board, Clean Car Standards - Pavley, Assembly Bill 1493, 2013, http://arb.ca.gov/cc/ccms/ccms.htm. (Accessed on December 22, 2017).

amendment was developed as a response to project changes in the 2016 RTP/SCS largely as a result of the approval of the Los Angeles County Metropolitan Transportation Authority's (Metro's) sales tax ballot measure, Measure M. The majority of changes included updates to project completion years, as well as minor modifications to project scopes, costs, and/or funding. In addition, several new transportation improvements were incorporated as part of this amendment. On August 1, 2017, SCAG received its federal conformity determination letter from the Federal Highway Administration/Federal Transit Administration (FHWA/FTA) indicating that all air quality requirements under this amendment had been met.

One of the RTP/SCS goals is to actively encourage and create incentives for energy efficiency. Energy efficiency reduces energy costs, increases reliability and availability of electricity for the state, and reduces environmental impact. The RTP/SCS includes the following actions to address energy conservation and reduce the region's contribution to global climate change:[17]

- Supporting new automobile technologies to increase fuel efficiency.
- Planning for the electrification or other near zero alternatives of the vehicle fleet.
- Adopting mitigation measures to reduce household energy consumption.
- Testing an informal alternative that examines plan performance should the price of fuel double compared to what is assumed in other alternatives.

Local Regulations

City of Riverside General Plan 2025. The following policies pertaining to energy conservation are drawn from the City's *General Plan 2025* and are applicable to the proposed project.[18] Although listed here, each of these objectives and policies are presented in Table 4.18-C later in this section with an evaluation of the project's consistency with the stated objectives and policies.

Open Space and Conservation Element

Policy OS-8.2: Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in existing developments.

Policy OS-8.4: Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities.

[17] *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life*. Southern California Association of Governments. April 2016.

[18] *Open Space and Conservation Element, Riverside General Plan 2025.* Pages 54 and 55. City of Riverside. 2007, Amended November 2012.

Policy OS-8.5: Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools).

Policy OS-8.6: Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24.

Policy OS-8.7: Encourage mixed use development as a means of reducing the need for auto travel.

Policy OS-8.9: Encourage construction and subdivision design that allows the use of solar energy systems.

Policy OS-8.10: Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies.

Policy OS-8.12: Require bicycle parking in new non-residential development.

City of Riverside Green Action Plan. In July 2005, the City of Riverside assembled a Clean and Green Task Force that developed guidelines for a cleaner, greener, and more sustainable city. Its sustainability policy statement highlighted the following categories: save water, keep it clean, make it solar, make it shady, clean the air, save fuel, make it smart, and build green. The task force created a 38-point *Clean and Green Sustainable Riverside Action Plan* (*Green Action Plan*) to transform the policy statement into an implementation plan. The *Green Action Plan* is an evolving document that outlines ways to improve air quality, reduce traffic congestion, increase accessibility and use of parks, and otherwise preserve the environment.[19] The first *Riverside Green Action Plan* was approved by the City Council in December 2007. To ensure that the tasks of the *Green Action Plan* would be carried out successfully, the City formed a Green Accountability Performance Committee, and within just two years, nearly all of the plan's 38 tasks had been accomplished. In February 2009, the California Department of Conservation introduced Riverside as California's First Emerald City, and in September 2009, the City introduced a *Green Action Plan–Emerald City* update. The latest *Green Action Plan* (2012) includes 19 goals and more than 50 tasks within the following eight areas: energy, GHG emissions, waste, urban design, urban nature, transportation, water, and healthy communities. The relevant focus areas and goals to which the Project will beneficially contribute are discussed below.

[19] *Green Action Plan, 2012.* City of Riverside. http://www.greenriverside.com/about-green-riverside/green-action-plan (accessed December 22, 2017).

Although listed here, each of these goals are presented in Table 4.18-C later in this section with an evaluation of the project's consistency with the *Green Action Plan*.

Energy

Goal 1: Increase the use of non-GHG emitting energy by 2020 to 50 percent with at least 33 percent coming from renewable sources through incentive and educational programs.

Goal 2: Save 1 percent of communities' load annually based on a 2004 baseline and reduce the City's peak electrical load demand by 10 percent overall by implementing tiered rate structures and streamlining electricity usage monitoring mechanisms.

Waste Reduction

Goal 6: Implement programs to reduce waste, based on the 2007 per capita baseline, by 75 percent by 2020.

Goal 7: Implement educational programs throughout the community to encourage green practices.

Urban Design

Goal 9: Meet the environmentally sensitive goals of the GP 2025 specified in the Mitigation Monitoring Program of the Environmental Impact Report, and the Implementation Plan following the timelines set forth in each.

4.19.3 Thresholds of Significance

The CEQA Guidelines provide no specific thresholds for impacts associated with energy consumption. However, Appendix F of the CEQA Guidelines (14 CCR 15000 et seq.) provides guidance for evaluating whether a development project may result in significant impacts with regard to energy. Based on Appendix F, a development project could have a significant impact on energy conservation if the project would:

- (Threshold A) Result in wasteful, inefficient, or unnecessary consumption of energy; conflict with existing energy standards and regulations; or place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity.

4.19.4 Project Design Features

The proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions. Environmental stewardship shall be emphasized in every new construction and reconstruction project. *Chapter 5: Design Guidelines*, subsection *K. Sustainable Design*, of the CBUSP proposes sustainability oriented design guidelines exceeding the requirements of the California Green Building Standards Code (CALGreen). All future developments and major renovations to CBU will incorporate the following sustainable design elements, as they apply to conserving energy, in accordance with the proposed CBUSP Amendment:

Energy Efficiency

- Nonessential exterior lighting shall be turned off by automatic controllers from 11:00 P.M. to the following evening at dusk. Where feasible, essential lighting shall be equipped with occupancy-sensing controls to reduce power to provide lighting at minimum safety thresholds when areas are unoccupied. Lighting shall be ramped up to full power (based on zones) when motion is detected in the vicinity.
- All new projects shall be designed to perform, at a minimum, per the 2016 Title 24 Energy Code base case.
- All new development and retrofit projects shall include opportunities for energy efficiency incentive funding through the Riverside Public Utilities Programs and Services.
- New development projects will incorporate high-efficiency mechanical systems as warranted. The University will investigate the potential for incorporation of highly efficient systems and passive or mixed mode (mechanical and natural ventilation) systems.
- The University will reduce energy consumption through ongoing monitoring and re/retro commissioning of building systems to ensure optimal operation.
- The exclusive use of flat roofs on buildings should be avoided whenever possible. Roofing materials for flat roofs should consider manufacturers that provide "cool roof" options as part of the sustainability strategy to meet the *City of Riverside Green Action Plan*.
- New construction projects shall be designed to maximize daylight access for interior occupied spaces. Top lighting and side lighting strategies shall be combined to optimize daylight access for building occupants. Daylighting strategies to be investigated for feasibility include, but are not limited to exterior/interior light shelves, skylights and monitors, clerestory windows, tubular skylights, and light wells.

Renewable Energy

- The installation and use of on-site renewable energy systems shall be investigated to reduce demand on existing energy grid infrastructure and to support the *City of Riverside Green Action Plan* goals.
- To achieve *City of Riverside Green Action Plan* goals, the University will consider introducing renewable energy such as photovoltaic and solar water heating into new construction projects and in the renovation of academic and residential facilities. Installations on roofs and inconspicuous areas can minimize the visual impact to the campus architecture while still providing energy offsets to essential areas within the campus.

Water Conservation and Efficiency

- Landscape design and plantings shall complement existing surrounding landscape materials. Shade trees in new landscape designs will be provided to reduce heat island impacts (when shading paved/developed surfaces) and to support the *City of Riverside Green Action Plan* goals.
- Where feasible, waste heat recovery systems will be incorporated to capture heat from drainage water to pre-heat domestic water supplies.

Third-party certification of sustainable performance is not required for campus projects. Project teams may, at their discretion, elect to pursue certification for projects utilizing available rating system programs such as U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Rating System or Build It Green's Green Point Rated System for residential developments.[20]

4.19.5 Environmental Impacts Before Mitigation

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

The construction phase will require electricity and natural gas for the manufacture and transportation of building materials, preparation of the site, and construction of the buildings and infrastructure. The operational phase will require electricity for multiple purposes including, but

[20] *California Baptist University Specific Plan, Public Review Draft,* Chapter 7 Section 2-3. Riverside. August 2018.

not limited to, building heating and cooling, lighting, appliances, electronics, and specialized equipment.

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

For operational activities, annual electricity and natural gas consumption were calculated using demand factors provided in the CalEEMod output as part of the previously referenced technical report (Appendix L of this DEIR). The Project's electricity and gas demand is shown in Table 4.19.A. The Project's electrical consumption was estimated to be approximately 20,648,700 kWh (approximately 20.65 million kWh) of electricity per year and the natural gas consumptions was estimated to be approximately 61,365,400 thousand British thermal units (kBTUs) per year or approximately 613,654 therms.[21] RPU sold approximately 2,327,400 megawatt-Wh of electricity in 2016 and SCG produced approximately 5,123 million therms in 2016. At full build-out, the Project's electricity demand would be approximately 0.9 percent of the existing electricity in the City of Riverside and the natural gas demand would be approximately 0.01 percent of the existing natural gas use in SCG's service area.

Energy impacts associated with transportation during operation were also assessed using the traffic data contained in the technical study. Based on the annual VMT, gasoline and diesel consumption rates were calculated using the South Coast Air Quality Management District-specific miles per gallon in EMFAC2016. As shown below in Table 4.19.A, a total of 490,725 gallons of gasoline and 50,945 gallons of diesel fuel are estimated to be consumed each year by the proposed Project.

[21] 1 therm equals 100 kBTU.

Table 4.19.A
Annual Energy Consumption

Land Use Type	Electricity Use kWh/year	Natural Gas Use kBTU/year	Fuel Use Gal/year
Apartments Mid Rise	18,092,700	58,599,400	
Unenclosed Parking Structure	980,000	0	
University/College (4Yr)	1,576,000	2,766,000	Gasoline 490,725 Diesel 50,945
Totals	20,648,700	61,365,400	Gasoline 490,725 Diesel 50,945

Source: Air Quality and Greenhouse Gas Emissions, LSA, Appendix A: CalEEMod Printout, December 2017

As previously stated, the proposed CBUSP Amendment provides a framework to guide development of campus boundary and facility expansions. Environmental stewardship and energy conservation shall be emphasized in every new construction and reconstruction project. The CBUSP proposes sustainability oriented design guidelines exceeding the requirements of the California Green Building Standards Code (CALGreen) to be implemented as practical. Pursuant to the vision of the CBUSP Amendment, all future developments and major renovations to CBU will incorporate energy conservation design that balances three often-competing interests: environmental concerns, economic constraints, and social equity. As detailed in Table 4.19.C, all future developments and major renovations to CBU administered pursuant to the CBUSP Amendment will incorporate energy conservation design elements in accordance with the objectives, policies, and goals of the *Riverside Green Action Plan* and *Riverside General Plan 2025*.

Table 4.19.B
City of Riverside Green Action Plan and General Plan Consistency Analysis

Green Action Plan Goals	General Plan Objectives and Policies	Consistency Analysis
Energy **Goal 1:** Increase the use of non-GHG emitting energy by 2020 to 50 percent with at least 33 percent coming from renewable sources through incentive and educational programs. **Goal 2:** Save 1 percent of communities' load annually based on a 2004 baseline and reduce the City's peak electrical load demand by 10 percent	**Objective OS-8** Encourage the efficient use of energy resources by residential and commercial users. **Policy OS-8.2** Require incorporation of energy conservation features in the design of all new construction and substantial rehabilitation projects pursuant to Title 24, and encourage the installation of conservation devices in	**Consistent:** Development implemented under the proposed CBUSP Amendment shall occur in accordance with all applicable requirements of the CCR, Title 24 (also known as the California Building Standards Code or the California Building Code) and Title 16, *Buildings and Construction*, of the RMC in effect at the time of construction. Future projects implemented under the proposed CBUSP Amendment would be required to comply with California's CALGreen building regulations as

Table 4.19.B
City of Riverside Green Action Plan and General Plan Consistency Analysis

Green Action Plan Goals	General Plan Objectives and Policies	Consistency Analysis
overall by implementing tiered rate structures and streamlining electricity usage monitoring mechanisms. **Waste Reduction** **Goal 6:** Implement programs to reduce waste, based on the 2007 per capita baseline, by 75 percent by 2020. **Goal 7:** Implement educational programs throughout the community to encourage green practices. **Urban Design** **Goal 9:** Meet the environmentally sensitive goals of the GP 2025 specified in the Mitigation Monitoring Program of the Environmental Impact Report, and the Implementation Plan following the timelines set forth in each.	existing developments. **Policy OS-8.4** Incorporate solar considerations into development regulations that allow existing and proposed buildings to use solar facilities. **Policy OS-8.5** Develop landscaping guidelines that support the use of vegetation for shading and wind reduction and otherwise help reduce energy consumption in new development for compatibility with renewable energy sources (i.e., solar pools). **Policy OS-8.6** Require all new development to incorporate energy-efficient lighting, heating and cooling systems pursuant to the Uniform Building Code and Title 24. **Policy OS-8.7** Encourage mixed use development as a means of reducing the need for auto travel. **Policy OS-8.9** Encourage construction and subdivision design that allows the use of solar energy systems. **Policy OS-8.10** Support the use of public transportation, bicycling and other alternative transportation modes in order to reduce the consumption of non-renewable energy supplies. **Policy OS-8.12** Require bicycle parking in new non-residential development.	implemented through the requirements of the UBC Title 24. The UBC Title 24 is 1) "the most stringent, environmentally friendly building codes in the U.S.;" and 2) "CALGreen is a comprehensive, far-reaching set of regulations which mandate environmentally advanced building practices and regulations designed to conserve natural resources and reduce greenhouse gas emissions, energy use, and water use." CBU will consider introducing renewable energy such as photovoltaic and solar water heating into new construction projects and in the renovation of academic and residential facilities. CBU's Central Plant is a centralized heating and cooling facility serving the core academic and administrative areas of the campus and is subject to SCAQMD permitting pursuant to Rule 1146.1. Any upgrades and/or expansion of the Central Plant shall be reviewed and approved by the SCAQMD in accordance with Rule 1146.1. In addition, in compliance with the CALGreen building regulations, the Project proposes to incorporate the following sustainable design features to further reduce its environmental footprint through various objectives and policies designed to shape and implement future development within the CBU Specific Plan Zone, including: **Objective 6**: Encourage environmentally sustainable development and operational practices. **Policy 6.1**: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside Building Code requirements. **Policy 6.2**: Reduce the University's

Table 4.19.B
City of Riverside Green Action Plan and General Plan Consistency Analysis

Green Action Plan Goals	General Plan Objectives and Policies	Consistency Analysis
		overall water consumption consistent with local and statewide goals. **Policy 6.3:** Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements. **Policy 6.4:** Implement sustainability measures that complement and support the *City of Riverside Green Action Plan.* The proposed Project will be required to implement water-efficient landscaping design (i.e., drought-tolerant landscaping) within the Project site. The proposed Project will implement the Materials and Resources Sustainable Design Guidelines contained in the CBUSP Amendment (Chapter 5: Design Guidelines). In compliance with CalGreen requirements, at least 65% of all nonhazardous construction waste generated by the proposed Project would be recycled and/or salvaged (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard). Furthermore, 100% of excavated soil shall be reused or recycled. The proposed Project site is adjacent to public transportation. The Riverside Transit Agency's Gold Line and Route 1 operate along Magnolia Avenue adjacent to the CBU campus and connect to other bus routes in Riverside and surrounding communities. Three bus stops facilitate bus service to the CBU Specific Plan Zone. As detailed in Section 4.10.4 of this EIR (Chapter 5 of the CBUSP Amendment), and in accordance with Policy 2.3 of the CBUSP Amendment the Magnolia Avenue Corridor shall be designed as a pedestrian-oriented mixed-use boulevard along the campus frontage. The type of uses proposed and their proximity to each other allow for increased pedestrian and bicycle activity. The CBU policy of students living on campus would reduce commutes to,

Table 4.19.B
City of Riverside Green Action Plan and General Plan Consistency Analysis

Green Action Plan Goals	General Plan Objectives and Policies	Consistency Analysis
		from, and within the City, and the increase in student housing relative to jobs generated by the proposed Project would help improve the jobs-housing balance in the City. By providing housing opportunities in a "jobs rich" and "housing poor" area, the Project will potentially reduce the length of work and school related trips for commuters. David asks: "Per J. Shardlow: I don't understand the revisions which strike out the technical data on gasoline utilized: Ukiah Citizens for Safety First v. City of Ukiah (1st Dist., Div. 3, 2016) 248 Cal.App.4th 256 held as follows: "The [Ukiah Costco] EIR … clearly fails to meet the standards set forth in CCEC [a key 2014 decsion] … [T]he Costco EIR concludes that the project will generate 11,204 new vehicle trips per weekday, but fails to calculate the resulting energy impacts of those trips. The EIR also improperly relies on compliance with the building code to mitigate operational and construction energy impacts, without further discussion of the Appendix F criteria. Finally, as in CCEC, the city's reliance on mitigation measures designed to reduce greenhouse gas emissions is misplaced." Does Natural Gas Use include fuel related to vehicle trips? Ever since these two cases, I have always seen energy impacts expressed in terms of gallons of fuel. Appendix F of CEQA requires an analysis of "[t]he project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project, including construction, operation, maintenance, and removal."

Sources: *Green Action Plan, 2012.* City of Riverside. http://www.greenriverside.com/about-green-riverside/green-action-plan (accessed December 22, 2017).
Open Space and Conservation Element, Riverside General Plan 2025. Pages 54 and 55. City of Riverside. 2007, Amended November 2012.

The proposed CBUSP Specific Plan Amendment provides a framework to guide development of campus boundary and facility expansions. Environmental stewardship shall be emphasized in every new construction and reconstruction project. *Chapter 5: Design Guidelines, Section K. Sustainable Design*, of the CBUSP Specific Plan proposes sustainability oriented design guidelines exceeding the requirements of the California Green Building Standards Code (CALGreen) to be implemented as practical.

SCAG's 2016/2040 RTP/SCS actively encourages and creates incentives for energy efficiency to reduce energy costs, increase reliability and availability of electricity for the state, and reduce environmental impact. Additionally, the Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) includes energy measures designed to increase community-wide building and equipment efficiency and renewable energy use, and promote energy efficiency and renewable energy generation for use supporting municipal operations that support the community. As detailed in Section 4.10.5 of this EIR, the proposed Project is consistent with the City's *General Plan 2025* and SCAG's 2016 RTP/SCS for the purposes of encouraging and creating incentives for energy efficiency. Furthermore, as detailed in Section 4.7.5 of this EIR, with implementation of Mitigation Measures MM-GHG-1 and MM-GHG-2 designed to ensure energy efficiency in project design, construction and operation, the proposed Project is consistent with the City's RRG-CAP.

All future developments and major renovations to CBU will incorporate sustainable design elements in accordance with the proposed CBU Specific Plan as summarized in Table 4.18-C. The above design features will result in the construction and operation of energy efficient administrative, academic, recreational, athletic buildings and facilities to meet the student growth envisioned by the CBUSP. The Project also provides and promotes alternatives to vehicular modes of travel, which will reduce car trips and result in efficient alternative transportation choices. Given these considerations, the proposed Project will not contribute to wasteful, inefficient, or unnecessary consumption of energy; conflict with existing energy standards and regulations; or place a significant demand on local and regional energy supplies or require a substantial amount of additional capacity. Impacts are considered **less than significant**. No additional mitigation is required.

4.19.6 Mitigation Measures

CEQA Guidelines Section 15126.4 requires Draft EIRs to describe feasible measures that can minimize significant adverse impacts. As no impacts related to energy have been found to be potentially significant, no mitigation measures are required. Adherence to standard procedures, including applicable objectives and policies of the CBUSP, the *Riverside Green Action Plan*,

General Plan 2025, and RRG-CAP, as well as SCAG's 2016/2040 RTP/SCS will ensure all impacts related to energy use are less than significant.

4.19.7 Environmental Impacts After Mitigation Is Incorporated

The analysis above indicates that the project will not exceed significance criteria for energy conservation impacts. Therefore, all energy conservation impacts are **less than significant**, and no mitigation measures are required.

4.19.8 References

California Energy Commission, Commission Report. *2017 Draft Integrated Energy Policy Report*. October 2017.

California Energy Commission, Energy Consumption Data Management System (CEC ECDMS), *California Energy Consumption Database, Electricity Consumption by Entity*, interactive web tool. http://www.ecdms.energy.ca.gov/elecbyutil.aspx. (Accessed December 26, 2017).

CEC ECDMS(b). *California Energy Consumption Database, Natural Gas Consumption by Entity*, interactive web tool. http://www.ecdms.energy.ca.gov/gasbyutil.aspx. (Accessed December 26, 2017).

City of Riverside. *City of Riverside General Plan 2025*. November 2007.

City of Riverside, *City of Riverside General Plan 2025 Final Program Environmental Impact Report*. December 2007.

City of Riverside. *Green Action Plan.* 2012.

Riverside Public Utilities (RPU). *2017 Financial Report*. December 2017.

RPU. *Annual Disclosure Report Year Ending June 30, 2016*. March 2017b.

THIS PAGE INTENTIONALLY LEFT BLANK

CHAPTER 5.0
MANDATORY CEQA TOPICS

California Environmental Quality Act (CEQA) Guidelines Section 15126 requires environmental impact reports (EIRs) to include a discussion of (1) the significant environmental effects of a project, (2) the unavoidable significant environmental effects if the project is implemented, (3) any irreversible changes should the project be implemented, and (4) growth-inducing impacts (14 CCR 15000 et seq.).

The following is a guide to where most of these issues are discussed in this document:

- Significant Environmental Effects – throughout Chapter 4.0.
- Mitigation Measures – Executive Summary and throughout Chapter 4.0.
- Alternatives – Chapter 7.0.
- Growth-Inducing Impacts – Chapter 8.0.

Therefore, since the above issues are discussed in other sections of this document, this chapter will only address the proposed project's significant unavoidable and irreversible impacts.

5.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(b) further directs EIRs to address impacts from a project that will result in significant impacts, including those that cannot be mitigated below a level of significance. A summary of all the environmental issue areas and the resultant significance and listing of mitigation measures is found in the Executive Summary of this document. To summarize, the following issue areas will result in a significant impact even after mitigation measures have been incorporated, thus resulting in an unavoidable impact:

Traffic

Impacts would remain significant and unavoidable even after mitigation at the following intersections:

- Adams Street/Magnolia;
- Adams Street/SR-91 Westbound Ramp;
- Adams Street/SR-91 Eastbound Ramp;
- Magnolia Avenue/Monroe Street; and
- Magnolia Avenue/Jefferson Avenue.

Impacts would remain significant and unavoidable even after mitigation at the following roadway segments:

- Magnolia Avenue, between Jefferson Street and Adams Street; LOS E
- Magnolia Avenue, between Adams Street and Campus View Drive; LOS E
- Magnolia Avenue, between Campus View Drive and Monroe Street – LOS E
- Magnolia Avenue, between Monroe Street and Overland Street – LOS E
- Magnolia Avenue, between Overland Street and Jackson Street – LOS E
- Adams Street, between Garfield Street and Magnolia Avenue – LOS E
- Adams Street, between Briarwood Drive and Diana Avenue – LOS E
- Adams Street, between SR 91 WB Ramps and Indiana Avenue – LOS E.

There are no feasible measures to mitigation impacts to the state highway system (SR-91). Impacts would remain significant and unavoidable at the following freeway merge/diverge locations:

- SR 91 Eastbound Onramp at Adams Street.

5.2 SIGNIFICANT IRREVERSIBLE CHANGES

CEQA Guidelines mandate that the EIR must address any significant irreversible environmental changes that would be involved in the proposed action should it be implemented (14 CCR 15126(c)). An impact would fall into this category if:

- The project would involve a large commitment of nonrenewable resources;
- The primary and secondary impacts of the project would generally commit future generations of people to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental incidents associated with the project; and
- The proposed consumption of resources is not justified (e.g., the project results in wasteful use of energy).

Determining whether the Project may result in significant irreversible effects requires a determination of whether key resources would be degraded or destroyed in such a way that there would be little possibility of restoring them. The Project implemented through the Specific Plan Amendment would result in the use of nonrenewable resources and energy sources, including

fossil fuels during construction activities. Fossil fuels would be used to power equipment, as well as delivery and construction employee vehicles. Use of these energy sources would be considered a permanent commitment of resources. The future operation of the Project would have a long-term permanent commitment of nonrenewable energy sources such as electricity, natural gas and fossil fuels (employee and student vehicular trips). The consumption of energy resources is discussed in Section 4.19 *Energy Consumption* and Section 4.7 *Greenhouse Gas Emissions*. Mitigation is provided to reduce energy consumption under the discussion on greenhouse gas emissions to the extent feasible. Since the Specific Plan is proposed over a 10 year period it is reasonable to assume technology will advance that will reduce the use of fossil fuels (i.e., increased use of electric and hybrid vehicles, cool roofs to reduce the use of air conditioning and implementation of building codes that require heating and air conditioning within in buildings by individual sectors that can be controlled locally). The proposed Project's energy consumption would be relatively minor compared to other local and regional projects. Therefore, this would not be considered a significant irreversible environmental effect.

THIS PAGE INTENTIONALLY LEFT BLANK

CHAPTER 6.0
CUMULATIVE IMPACT ANALYSIS

6.1 INTRODUCTION

The California Environmental Quality Act (CEQA) requires that an Environmental Impact Report (EIR) examine the cumulative impacts associated with a project, in addition to project-specific impacts. The discussion of cumulative impacts must reflect the severity of the impacts and the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone (14 CCR 15130(b)).

As stated in the CEQA Guidelines, an EIR "shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively "considerable" (14 CCR 15130(a)). "Cumulatively considerable" means that "the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects as defined in Section 15130" (14 CCR 15065(c)). Section 15355 of the CEQA Guidelines states that cumulative impacts occur from "the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

A cumulative impact is not considered significant if the impact can be mitigated to below the level of significance through mitigation, including providing improvements and/or contributing funds through fee-payment programs. The EIR must examine "reasonable options for mitigating or avoiding any significant cumulative effects of a proposed project" (14 CCR 15130(a)(3) and 15130(b)(5)).

6.2 CUMULATIVE ANALYSIS SETTING

The cumulative impact analysis for the proposed CBU Specific Plan Amendment (Project) is based on information contained in the City of Riverside (City) General Plan (GP) 2025 (City of Riverside 2007a), and the Final Program EIR for the City of Riverside General Plan 2025 (Final GP 2025 PEIR; City of Riverside 2007b), since the site is located at CBU, in the City, within the County of Riverside. Both of these documents are incorporated in this chapter by reference.

6.3 CUMULATIVE FORECASTING METHODOLOGY

Section 15130(b)(1)(A) of the CEQA Guidelines allows for the preparation of a list of past, present, and reasonably anticipated future projects as a viable method of determining cumulative impacts. This discussion uses the following approach: an initial list and description of all related projects is presented, followed by a discussion of the effects that the project may have on each environmental category of concern, such as aesthetics, air quality, traffic, etc. Consistent with CEQA (California Public Resources Code, Section 21000 et seq.), this discussion is guided by the standards of practicality and reasonableness.

This EIR utilizes the "list method" approach in the cumulative analysis, and therefore focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects. The cumulative impact scenario considers other projects proposed within the Project area that have the potential to contribute to cumulatively considerable impacts. Based on discussions with City staff, the projects identified in Table 6.A – Cumulative Development Projects are located in the Project area and may have the potential to contribute to cumulative effects. The location of the cumulative development projects in relation to the Project site is shown in Figure 6-1 – Cumulative Development Location Map. In determining the appropriate proximity to the Project for the cumulative development projects, the City included all related development projects in the City.

Table 6.A
Cumulative Development Projects

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Detail	Status
1	Drive-Thru Restaurant P09-0185 7590 Indiana Avenue	Commercial	280 square feet on 0.9 acre.	Approved (8/11/2009) Open
2	Magnolia Garden Condominiums P10-0438 3875 Dawes Street	Residential	62 dwelling units on 3.61 acres.	Approved (8/3/2010) Open
3	Classroom and Laboratories P14-0450 2900 Adams Street (California Baptist University)	Institutional	Revised Conditional Use Permit to establish classrooms and laboratories within 5 office and warehouse lease spaces; 9,085 square feet.	Approved (8/8/2014)

Table 6.A
Cumulative Development Projects

No. on Figure 6-1	Project (Case Number) Project Location	Land Use	Project Detail	Status
4	Walgreens P14-0673, P14-0675, P14-0928 9471 and 9477 Magnolia Avenue	Commercial	Pharmacy with drive-thru service; 10,776 square feet.	Approved (2/3/2015) Not constructed and Expired
5	Health and Fitness Club P15-0847 3490 Madison Avenue	Commercial	Health club on a developed site; 38,000 square feet	Approved (1/12/17) Open
6	Retail Building P12-0184, P12-0185, P12-0187 9241 and 9265 Audrey Avenue (Azar Plaza)	Commercial	6,150 square foot multiple tenant retail building on a two-parcel site.	Approved (11/13/12) Not constructed and Expired
7	Car Repair Facility P09-0147 7840 Indiana Avenue	Commercial	New and used car sales, accessory and tire sales/installation, and auto body repair and painting within an existing 12,510 square foot building.	Approved (6/9/2009) Open

6.4 ASSESSMENT OF CUMULATIVE IMPACTS

6.4.1 Aesthetics

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

The comprehensive CBUSP Amendment is proposed by CBU to accommodate a projected increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building area for academic and recreation purposes, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and 805,000 square feet of parking structure with incidental office space by 2025.

By its very nature, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure it does not result in significant impacts to scenic resources or results in a substantial increase in lighting or glare. Cumulatively, higher intensity land uses and more lighting would be introduced into the area as a result of the projected increase in student population and growth of the campus, as well as from development surrounding the CBU Specific Plan Zone. Although the CBUSP Amendment cannot administer development standards outside of its jurisdiction, it would reduce its incremental contribution to cumulative aesthetic-related impacts from development within the CBU Specific Plan Zone to less than significant levels by implementing the following policies of the CBUSP Amendment:

- Policy 2.1 requires edge and transition standards that respect the scale and character of the campus community interface in accordance with the CBUSP Amendment development standards and the *Citywide Design Guidelines and Sign Guidelines.*

- Policy 2.2 requires a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and providing connectivity to the campus uses.

- Policy 2.3 requires the Magnolia Avenue Corridor to be designed as a major multi-use corridor and attractive boulevard along the campus frontage.

- Policy 3.1 establishes and maintains modern educational and research facilities that respond to the needs of the University's mission and planned curriculum.

- Policy 3.3 expands the athletic facilities to accommodate campus growth and attract higher level student athletes.

- Policy 3.4 provides for a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.

- Policy 3.5 pursues completion of the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.

- Policy 5.1 pursues adaptive reuse of designated historical structures.

- Policy 5.2 provides for new buildings to be architecturally compatible with the existing historical campus architecture.

- Policy 5.3 protects historical landscapes and other non-structural features.

- Policy 5.4 designates a CBU Historical District, per Title 20 of the Riverside Municipal Code that encompasses buildings and other features that reflect the City's rich history.

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

Within the CBU Specific Plan Zone, permitted and supportive uses directly related to the operations of CBU are listed in Table 2.C and would be subject to the development standards and design guidelines administered pursuant to the proposed CBUSP Amendment. All development permitted as a matter of right shall be subject to Administrative Design Review, pursuant to the requirements of Chapter 7 of the CBUSP Amendment to ensure compliance with the provisions of the CBUSP Amendment. These guidelines are intended to ensure design consistency throughout the CBU Specific Plan Zone for an enduring, identifiable, and dynamic image for the Project site and the community as it transitions to an urban-style campus from the current suburban model. However, the Specific Plan retains a degree of flexibility to accommodate various development types within the CBU Specific Plan Zone and facilitate a compatible transition between the CBU Specific Plan Zone and adjacent properties that would be subject to the *Citywide Design Guidelines and Sign Guidelines* and the design guidelines of the *Magnolia Avenue Specific Plan.*

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

6.4.2 Agriculture and Forestry Resources

The universe for cumulative agricultural and forest resource impacts is western Riverside County. The western portion of the County is generally transitioning away from agriculture, while the eastern portion of the County (e.g., Coachella Valley) is more largely rural and still supports extensive agriculture. The State Department of Conservation, Office of Land Conservation, publishes a Farmland Conversion Report every two years as part of its FMMP. These reports document land use conversion by acreage for each California county. The most recent data are for the 2014-2016 period, during which western Riverside County experienced a net loss of approximately 100 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and approximately 2,830 acres of Farmland of Local Importance (total loss equals approximately 2,930 acres).[1]

The loss of approximately 100 acres of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and approximately 2,830 acres of Farmland of Local Importance (total loss equals approximately 2,930 acres) is an incremental but potentially significant loss of agricultural soils in western Riverside County. However, as detailed in Section 4.2.5, implementation of the CBUSP Amendment would not contribute to any loss of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance. Additionally, the Project site does not contain agricultural or forest land or land administered under Williamson Act contracts. Implementation of the CBUSP Amendment does not include development within CBU's open space footprint, and there is no proposed increase in utilization of land within the CBU Specific Plan Zone through the expansion of the development footprint within CBU's existing open space area. Therefore, the proposed Project will have **no impact** cumulatively to loss of agriculture and/or farmland (including any forest-related resources). No mitigation is required.

6.4.3 Air Quality

Due to the defining geographic and meteorological characteristics of the Basin, the cumulative area for air quality impacts is the Basin itself. As discussed in Section 4.3 (Air Quality, Related Regulations, Criteria Air Pollutants), the portion of the Basin within which the City is located is designated as a non-attainment area for ozone, O_3, NO_2, PM_{10}, and $PM_{2.5}$ under State Standards; and for ozone and O_3 and $PM_{2.5}$ under both federal standards.

Project emissions within the context of SCAQMD's regional emissions thresholds provide an indicator of potential cumulative impacts within the Basin. Cumulative localized impacts for

[1] California Department of Conservation, Farmland Mapping and Monitoring Program. *Riverside County 2016 Field Report, Western Riverside County*. http://www.conservation.ca.gov/dlrp/fmmp/Documents/fmmp/pubs/2014-2016/field_reports/riv16.pdf (Accessed August 17, 2017).

pollutants are also considered and reflect Project air pollutant emissions in the context of ambient conditions in the Project vicinity.

As discussed in Section 4.3.5 (Air Quality, Environmental Impacts before Mitigation), Section 4.3.7 (Environmental Effects after Mitigation Measures are Implemented), and the CBUSP Amendment CalEEMod Emissions Estimates, LST Analysis, the Project's short-term and long-term emissions will not exceed the SCAQMD thresholds.

As stated in Section 4.3 – Air Quality, SCAQMD considers the thresholds for project-specific impacts and cumulative impacts to be the same. The project would not emit any criteria air pollutants above regional significance. In addition, the project has also been determined to be consistent with the AQMP, since it is consistent with the underlying land use as determined by the CBUSP. Therefore, with implementation of Mitigation Measures (MM) AQ-1 through AQ-10, implementation of the CBUSP Amendment will not make a significant contribution to cumulatively adverse impacts to air quality. No additional mitigation is required.

6.4.4 Biological Resources

The universe for cumulative impacts to biological resources relative to the CBUSP Amendment is western Riverside County, which would take into account the Western Riverside Multiple Species Habitat Conservation Plan (MSHCP), for which the City is a Permittee.

The CBU campus is fully developed and surrounded by urban uses. By its very nature, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure its implementation does not result in significant impacts to biological resources. The CBUSP Amendment proposes an increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building area for academic and recreation purposes, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and a 805,000 square foot parking structure with incidental office space by 2025.

The CBUSP Amendment includes development standards (Chapter 4), design guidelines (Chapter 7), and implementation methods (Chapter 8) to ensure CBU's open space network is maintained and improved as a distinguished and functional component of CBU (Figure 2-7). CBU has also developed the CBU Tree Campus USA Urban Forest Management Guidelines to manage landscaping within the campus. Under a more urban-intensity model, CBU may modify internal open space areas and balconies of residential apartment complexes that would be transitioned to traditional student residences, which could include reducing individual open space areas, in order to reflect a development character more suitable to student life.

CBU's open space network consists of the Magnolia Lawn, Stamps Courtyard, Harden Square, a water quality detention basin, the athletic fields, and a network of smaller courtyards, plazas, and lawns that surround and are incorporated into the student housing areas. Total vegetation cover on the Project site is approximately 15 percent consisting of grassy athletic fields and open space lawns, ornamental trees, shrubs, and planters, and a constructed storm water detention basin with potential to support riparian/riverine resources (Figures 2-7 and 4.4-1). However, minimal native vegetation remains within the Project site or surrounding properties.

The Project site is located within the Western Riverside MSHCP area. The City is a Permittee to the MSHCP; therefore, the proposed Project is required to comply with applicable provisions of the MSHCP. Additionally, the Project is within the Stephens Kangaroo Rat Habitat Conservation Plan (SKRHCP) mitigation fee area; therefore, the proposed Project is required to comply with applicable provisions of the SKRHCP (See Section 4.4.2, Local Regulations, of this EIR).

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

At a programmatic level the CBUSP Amendment would be implemented in accordance with the County's MSHCP and SKRHCP, and the CBU Tree Campus USA Urban Forest Management Guidelines, as detailed in Section 4.4.5 of this EIR. Implementation of MM-BIO-1 and MM-BIO-2 would ensure impacts to biological resources from implementation of the CBUSP Amendment would be reduced to less than significant levels. Together these programmatic

actions would reduce impacts of individual development projects within the CBU Specific Plan Zone to less than significant levels.

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

For these reasons, implementation of the CBUSP Amendment will not make a significant contribution to cumulatively adverse impacts to biological resources, and no additional mitigation is required.

6.4.5 Cultural Resources

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

The comprehensive CBUSP Amendment is proposed by CBU to accommodate a projected increase in student enrollment from 8,414 total students in 2015 to 12,000 total students by 2025 under a more urban-intensity type of development. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building area for academic and recreation purposes, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and 805,000 square feet of parking structure with incidental office space by 2025.

By its very nature, the proposed CBUSP Amendment establishes programmatic development standards and design guidelines against which to review new development to ensure it does not result in significant impacts to cultural resources. Cumulatively, repurposing, modifying, or replacing historic buildings; constructing new facilities; and generally implementing higher intensity land uses have the potential to adversely impact cultural resources. However, development standards outlined in Table 4.5.A, *Disposition of Properties Surveyed for Historic Significance*, of this Draft EIR (Table 4-5 in the CBUSP Amendment) in addition to the objectives and policies (Chapter 2), development standards (Chapter 4), design guidelines (Chapter 5), and implementation methods (Chapter 6) presented in the CBUSP Amendment

incorporate self-mitigating project design features required for all future development and improvement projects to or in proximity to historical resources.

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

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

Public Resources Code Section 21083.2 and CEQA Guidelines Section 15064.5(f) recognize that historical or unique archaeological resources may be accidentally discovered during project construction. MM-CUL-3 and MM-CUL-4 require cultural resources monitoring for ground-disturbing activities in native soils in proximity to the known alignment of the Riverside Lower Canal to ensure any unanticipated archaeological discoveries are managed in accordance with CEQA guidelines. Additionally, at a programmatic level, MM-CUL-5 and MM-CUL-6 require all future development within the CBU Specific Plan Zone to protect cultural and paleontological resources by temporarily halting ground disturbing activities and consulting with a qualified archaeologist or paleontologist in the event of an unanticipated cultural or paleontological resources encounter. Furthermore, although unlikely to occur, potential impacts associated with human remains would be reduced to a less than significant level through adherence to Section 7050.5 of the California Health and Safety Code and PRC Section 5097.

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

6.4.6 Geology and Soils

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

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

6.4.7 Greenhouse Gas Emissions

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

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

21081(a)(2), a project has cumulatively considerable significant and unavoidable GHG impacts if other agencies do not take necessary action.

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

6.4.8 Hazards and Hazardous Materials

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

Pursuant to California Health and Safety Code Section 25507, CBU has established and implements a Hazardous Materials Business Emergency Plan for emergency response to a release or threatened release of a hazardous material in accordance with Section 25503. Specifically, CBU developed its *Hazardous Material & Hazardous Waste Maintenance Program* to outline the hazardous substances and waste dangerous goods that are expected to be handled on Site.[2] The plan is constantly updated and outlines proper storage and disposal locations, waste products generated, and a general description of fuel storage areas. This plan also contains an updated spill contingency plan, outlining detailed information on the risk and hazard analysis, safety considerations, initial spill response, and documentation and reporting protocol. The step by step procedures for initial spill response and reporting requirements were developed during

[2] *Hazardous Material & Hazardous Waste Maintenance Program*. California Baptist University, Department of Environmental Health and Safety. 2018, as amended.

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

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

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

6.4.9 Hydrology and Water Quality

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

Cumulatively, continued development within the Riverside County will put additional pressure on water supplies from the local groundwater basins, including the Lytle Creek, Rialto/Colton, Bunker Hill, North Riverside, South Riverside, Arlington, and Chino Basins. CBU owns and

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

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

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

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

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

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

6.4.10 Land Use and Planning

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

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

The proposed Project and cumulative development projects are subject to the provisions of the Western Riverside MSHCP and the SKRHCP. Each of the cumulative projects would be

required by the City of Riverside to conduct surveys and mitigate for impacts to loss of sensitive habitats and species in accordance with the provisions of the MSHCP and the SKRHCP. Project developers are also required to contribute mitigation fees identified in the MSHCP and the SKRHCP, in support of continued implementation of the plans. Because compliance with these plans reduces impacts to less than cumulatively considerable levels, cumulative impacts are not significant.

6.4.11 Mineral Resources

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

6.4.12 Noise

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

Construction noise would result in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. Although, construction noise is exempt from the City's noise standards when activities occur between the permitted hours, construction could still result in disturbances to noise-sensitive receptors in a project's vicinity, resulting in a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. To ensure maximum reduction in temporary or periodic increase in

ambient noise levels generated by construction activities, standard best management construction noise reduction measures shall be implemented, as identified as mitigation measure MM-NOI-1.

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

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

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

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

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

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

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

6.4.13 Population and Housing

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

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

The cumulative residential development projects identified in Table 6.3.A – Cumulative Development Projects represent a total of 62 condominiums expected to generate approximately 207 future residences in the City, based on a household size of 3.34 persons per residence.[3] As detailed in Section 4.13.1 of this EIR, there were 92,400 households in the City in 2012, with 118,600 households projected in 2040, and the population in the City was 310,700 in 2012 and is projected to be 386,600 in 2040. The proposed Project in conjunction with the anticipated increase in population from the cumulative residential development project would generate an additional 3,785 persons[4] in the City and would represent an increase of approximately 4.1 percent over the 2012 population and approximately 3.2 percent of the population forecast for 2040.

[3] *Quick Facts, City of Riverside, California.* United States Census Bureau. https://www.census.gov/quickfacts/fact/table/riversidecitycalifornia/PST045216. (Accessed March 2, 2018).

[4] 3,578 person increase by the proposed Project + 207 future residents by the cumulative residential project = 3,785 additional persons in the City.

The cumulative development projects will create temporary employment opportunities during construction. The Project involves an increase in student enrollment to 12,000 students in 2025. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building area for academic and recreation purposes, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and 805,000 square feet of parking structure with incidental office space by 2025. Additionally, the project will create an additional 323 jobs into the City. Moreover, as a 24 percent increase in population is expected from 2012 to 2040 within the City, it is reasonable to anticipate that the cumulative project's employment opportunities will be filled by residents that will reside in the region. Given the nature of the job opportunities and availability of labor, it is anticipated that any new jobs created by the proposed Project and cumulative development projects would not result in indirect population growth. As mentioned above, it is not certain if future enrollment will increase the population of the City. If students already live locally, they would be included in the existing SCAG growth forecasts. In the unlikely event all new students originate from outside the City, the forecast enrollment could increase the City's population by 3,578 (a 1.0 percent over 2017 estimates). Any increase in population resulting from development pursuant to the CBUSP is consistent with existing and future population forecasts and would not significantly (directly or indirectly) increase population growth in the City or region. The project in and of itself is self-sustaining and will not contribute to a cumulative population increase into the City. Therefore, a less than significant impact would occur. No mitigation is required.

6.4.14 Public Services

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

As additional development occurs in the City, there may be an overall increase in the demand for law enforcement and fire protection services, schools, libraries, and community centers, including personnel, equipment, and/or facilities. Increases in demand are routinely assessed by police and fire agencies, as well as by the City, as part of the annual monitoring and budgeting process. All development within the service areas of the City's Police and Fire Departments would be required to adhere to conditions established by these agencies and would be subject to applicable fees that will contribute to the maintenance of their facilities. The Project would result in the development of uses that are typical of those currently present in the service area for the City of Riverside's Police and Fire Departments and does not include any use or structure anticipated to disproportionally increase service demand beyond that which currently exists. Furthermore, all the future housing units within the CBUSP will be student housing and will not

include the addition of any housing units that would increase numbers of school age children or increase the demand for libraries or community centers given that CBU already provides such facilities for students. With adherence to standard conditions and payment of required development fees, no significant cumulative impact on law enforcement and fire services, schools, libraries, and/or community centers in the City would occur. No mitigation is required.

6.4.15 Recreation

Cumulative impacts refer to incremental effects of an individual project when viewed in connection with the effects of past projects, current projects, and probable future projects. In this case, the proposed project or action is the CBUSP Amendment, which by its very nature is an assessment of various potential cumulative impacts from future development.

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

The CBUSP Amendment is proposed by CBU to accommodate a projected increase in student enrollment to 12,000 total students by 2025 under a more urban-intensity type of development. To accommodate growth in student population, in 2017 CBU provided 827,614 square feet of building area for academic and recreation purposes, including construction of the 158,000 square foot Events Center for hosting athletic and cultural/artistic events, and the University anticipates providing an additional 400,000 square feet of building area for academic and recreation purposes and 805,000 square feet of parking structure with incidental office space by 2025.

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

By its very nature, the CBUSP Amendment establishes overall guiding principles and programmatic direction against which to review new development to assure it does not result in significant impacts to the environment from the use and/or construction of recreation and parks resources. The objectives and policies of the CBUSP Amendment related to parks and recreational facilities detailed in Section 4.15.2 of this EIR are designed to protect existing and provide for new recreation and park resources during the evaluation of future development. The programmatic development program detailed in Section 4.15.4 of this EIR establishes

comprehensive development standards and design guidelines against which to review new development to ensure it does not create significant impacts from the use and/or construction of recreation and parks resources. These self-mitigating project design features are required for all future development and improvement projects to or in proximity to recreation and park resources.

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

6.4.16 Traffic and Transportation

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

- Existing Conditions (Year 2016)
- Existing plus Ambient Conditions (Year 2025)
- Existing plus Ambient plus Cumulative Conditions (Year 2025)
- General Plan Buildout Conditions (Year 2025)

The Existing plus Ambient scenario is essentially a building block for the Existing plus Ambient plus Cumulative near term cumulative scenario and is therefore not reported in this EIR. For this reason, , this section herein analyzes Project impacts associated with the following baseline, near term cumulative, and long term cumulative scenarios:

- Baseline: Existing Conditions (Year 2025);

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

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

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

Intersections

Implementation of the project-specific improvements defined in Mitigation Measures MM-TRA-1 (add eastbound right turn lane at Adams Street/Magnolia Avenue) and MM-TRA-2 (close the Adams Street/Plaza Driveway intersection) were assumed to be in place in the Existing plus Ambient plus Cumulative plus Project level of service analysis. Existing plus Ambient plus Cumulative plus Project levels of service at study intersections are identified in Table 4.16.I. As shown in Table 4.16.I, two study area intersections are forecast to operate at LOS E or worse during the AM and/or PM peak hour. These intersections include:

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

The Project creates or contributes to a LOS reduction at these intersections. This is considered to be a significant impact and mitigation is required. To operate at a satisfactory LOS, improvements to the Adams Street/SR-91 EB and WB Ramps such as those being studied as part of the SR-91/Adams Street Project Study Report (PSR) would be required. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. Intersection impacts can be

reduced by incorporating mitigation measures TRA -1 through TRA-10 as described in Section 4.16.6. Impacts would remain significant and unavoidable even after mitigation at the following intersections:

- Adams Street/SR-91 West Ramp; and
- Adams Street/SR-91 Eastbound Ramp.

For these reasons Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans.

Roadway Segments

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

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

The Project reduces the level of service at these roadway segment from LOS C to LOS E. This is considered to be a significant impact and mitigation is required. For the segment of roadway on Adams Street between Briarwood Drive and Diana Avenue, 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.

For the segment of roadway on Adams Street between the SR-91 WB and EB Ramps, widening of Adams Street would be required. Although the SR-91/Adams Street PSR may lead to widening of Adams Street, the specific design of the improvements has not taken place. Freeway facilities including interchanges with local arterials are under the jurisdiction of Caltrans, causing the timing and funding of such improvements to be unknown. Additionally, there is no mechanism or fund in place for the City or the Project proponent to contribute fair share fees or implement improvements to change the LOS from unsatisfactory to satisfactory. For these reasons Project impacts are considered significant and unavoidable until the PSR improvements are funded or constructed by Caltrans.

Queuing

Table 4.16.K 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.K, 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?

Freeway Ramp Merge/Diverge Locations

Table 4.16.L shows that the study area freeway merge/diverge locations are forecast to operate at LOS C or better in the Existing plus Ambient plus Cumulative plus Project analysis with the exception of LOS F during the AM and PM peak hours at the SR 91 Eastbound Onramp at Adams Street. Although the SR 91 Eastbound Onramp at Adams Street is forecast to operate at LOS F during peak hours in the pre-Project condition (i.e., Existing plus Ambient plus Cumulative), the addition of Project traffic will add 1.8 pc/mi/ln density during the PM peak hour to the freeway segment. This is considered to be a significant impact and mitigation is required. To improve operations at this freeway segment, capacity-enhancing freeway mainline lanes improvements would be required. These freeway facilities are under the jurisdiction of Caltrans and no mechanism to contribute fair share toward a required improvement is available. Although the SR-91/Adams Street PSR may lead to auxiliary or mainline lane improvements near that Adams Street interchange that might improve merge/diverge LOS, the specific design of the improvements has not taken place. Since these are improvements are under the exclusive control of Caltrans, the timing and funding of these improvements are currently unknown and neither the City nor the Project proponent can contribute fair share fees or implement the required improvements. This impact is therefore considered to be **significant and unavoidable**.

General Plan Buildout Plus Project

With regard to the *General Plan 2025* buildout scenario, cumulative impacts to transportation/traffic could be significant if the addition of Project-related traffic combined with the traffic expected at buildout per the *General Plan 2025* results in any study area intersection operating at LOS E or F, except at some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis (*General Plan 2025*, p. CCM-11).

Intersection impacts can be reduced by incorporating mitigation measures MM-TRA-1 through MM-TRA-10 as described in Section 4.16.6. Impacts would remain significant and unavoidable even after mitigation at the following intersections:

- Adams Street/Magnolia Avenue;
- Adams Street/SR-91 West Ramp;
- Adams Street/SR-91 Eastbound Ramp;
- Magnolia Avenue/Monroe Street;
- Magnolia Avenue/Campus View;
- Magnolia Avenue/Jefferson Street.

Impacts would remain significant and unavoidable even after mitigation at the following roadway segments:

- Magnolia Avenue, all five segments from Jefferson Street to Jackson Street;
- Adams Street, between Garfield Street and Magnolia Avenue.

Air Traffic Patterns, Design Hazards, Emergency Access, and Conflict with Adopted Policies

Given the distance between the proposed Project site and cumulative project sites, impacts associated with air traffic patterns, design hazards, emergency access, or conflicts with adopted policies, plans, or programs supporting alternative transportation would not comingle and create impacts over and above those associated with the proposed Project. Cumulative impacts from the proposed Project and cumulative projects associated with these issues are considered less than significant. No mitigation is required.

6.4.17 Tribal Cultural Resources

The cumulative area for cultural resources is the ancestral territory of affected Native American tribes. Past, present, and reasonably foreseeable future projects in Native American traditional use area(s) would similarly include ground-disturbing activities with the potential to destroy, damage, or displace surface or previously undiscovered Native American cultural resources, including burials and associated funerary objects; therefore, the project, in combination with other cumulative activities in the project area, has the potential to result in a significant cumulative impact.

Through implementation of applicable provisions of SB 18 and AB 52, affected Native American governments have the opportunity to identify areas of Native American cultural resource sensitivity and develop appropriate mitigation to reduce and/or avoid said impacts. Similar to the Project, as other project(s) located in Native American traditional use area(s) developed, it is reasonable to conclude Native American participation in this process will provide equal opportunities to identify specific measures to reduce the significance of impacts to Native American cultural resources. Implementation of mitigation measures MM-CUL-1 through MM-

CUL-3 outlined in this EIR, and the CEQA documents for other developments in the City and other jurisdictions, will reduce potential cumulative Native American cultural resource impacts to a less than significant level. No additional mitigation for cumulative impacts is required.

6.4.18 Utilities

Water Supply Services. The cumulative area for water supply-related issues is the general Riverside portion of the RPU service area. Existing and future development within the RPU service area would demand additional quantities of water. The adopted 2015 Urban Water Management Plan (UWMP) projects population within the RPU service area to increase to 360,500 persons by the year 2040. Increases in population, square footage, and intensity of uses would contribute to increases in the overall regional water demand. The anticipated conversion of water-intensive uses and the implementation of existing water conservation measures and recycling programs would reduce the need for increased water supply.

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

CBU estimates that their wells supply approximately 85% of the non-potable water demand for landscaping, lawns, and athletic fields. Potable water is provided to CBU by City supplies. As detailed in Tables 4.18.E through 4.18.G of this EIR, RPU would have a reliable and sufficient water supply that would exceed projected demand through the year 2040 in wet, dry, and multiple-dry years.[5] Therefore, cumulative impacts to water supply would be less than significant. The proposed Project would connect to existing conveyance infrastructure and adequate treatment capacity is available. Therefore, the proposed Project would not make a significant contribution to any cumulatively considerable impacts on water supply or infrastructure.

Wastewater Facilities. RPU and the RPW conjointly manage and plan wastewater and recycled water operations and programs. It is anticipated that all additional wastewater generated by the proposed Project would be routed and treated at the Riverside Water Quality Control Plant (RWQCP), located at 5950 Acorn Street approximately 2.3 miles northwest of the CBU campus.

[5] *2015 Urban Water Management Plan*. Page 8-5. Riverside Public Utilities Water Division. June 2016

The cumulative area for wastewater-related issues is the RPU/RPW service area and the City of Riverside. Cumulative population increases and development within the area serviced by the RPU/RPW would increase the overall demand for wastewater treatment service. The anticipated project-specific water demand of 25,123,108 gallons of water per year, or 68,830.5 gallons of water per day would constitute potable water to be used for both drinking as well as sanitary needs resulting in wastewater. As a worst case scenario, even if all anticipated water demand were used for sanitary needs resulting in wastewater, the proposed project would generate an additional 68,830.5 gallons of wastewater per day.

Regional Water Recycling Plant Wastewater design hydraulic domestic sewage treatment capacity for the RWQCP is 46 million gpd.[6] The plant treats an average influent wastewater flow of approximately 27.2 million gpd,[7] leaving a surplus capacity of approximately 18.8 million gpd. The CBUSP Amendment would increase wastewater at the RWQCP by 0.25 percent, incrementally increasing demand for wastewater treatment.[8]

Any proposed changes to capacity of the RWQCP or any facility maintained by RPW are reviewed throughout the year by the City. For all new development within the RPW service area, impact fees are allocated to assist in the financing of any future collection and disposal facilities and any future sewer treatment plant facilities. Cumulative development would not exceed the capacity of the wastewater treatment system because the RWQCP would operate well below capacity under cumulative scenarios and would be expanded in the future as growth occurs.

Storm Water Drainage Facilities. Cumulatively, development within the watershed will result in an increase in impervious surfaces in addition to changes in land use and associated pollutant runoff characteristics. Increased impervious surfaces are likely to alter existing hydrology and increase potential pollutant loads. However, all future development in the City and throughout the Santa Ana RWQCB will be required to comply with the requirements of the NPDES permit program. Continued growth is anticipated to occur in the City and all new development and significant redevelopment will be required to minimize its individual impacts to storm water drainage and pollutant transport through implementation of BMPs.

The project site is currently developed with drainage systems and will be improving stormwater drainage systems as future development occurs. As new development occurs, localized storm drains will be constructed and connected to existing storm drain systems that flow to the basin. Additionally, the on-site detention basin will continue to retain runoff and allow for its treatment to attain applicable water quality standards for the region and allow for some infiltration into the

6 *2015 Urban Water Management Plan*. Page 7-7. Riverside Public Utilities Water Division. June 2016

7 Personal Phone Call with Robert Eland, Wastewater Analyst, September 5, 2017.

8 68,830.5 gallons of additional wastewater per day (worst case scenario) ÷ 27,200,000 gallons wastewater treatment per day = 0.25 percent contribution to daily treatment.

local aquifer. These improvements will be implemented as required to meet the demand of individual projects facilitated by implementation of the CBUSP Amendment based on the findings of project-specific WQMPs required for subsequent developments or improvements on campus in accordance with NPDES regulations. Similar requirements will be placed on all other development in the vicinity of the Project site by the City. Therefore, the proposed Project will not make a significant contribution to any cumulatively considerable impacts related to drainage or water quality on a local or regional basis.

Solid Waste. AB 341 mandates the reduction of solid waste disposal in landfills. The City's waste hauler will use a variety of County landfills in the area. With planned expansion activities of landfills in the Project vicinity and projected growth rates contained in the City's General Plan EIR, the increase in solid waste generated by the development under the proposed CBUSP Amendment is not anticipated to exceed capacity of the landfills. Additionally, Public Resource Code Section 41780 required every city and county to diver from landfills at least 50 percent of waste generated within their jurisdiction, and the City has exceeded its required reduction in recent years.[9]

Solid waste is transported to the Agua Mansa Landfill located at 1830 Agua Mansa Road in Colton.[10] The Agua Mansa Landfill has a remaining capacity of 1.35 million tons per day.[11] Future development within the CBUSP Amendment would contribute to Development Impact Fees (DIF) to contribute funding for expansion of solid waste facilities. As detailed in Section 4.18.5 of this EIR, the proposed Project would contribute an incremental amount of solid waste to the Agua Mansa Landfill; the amount of solid waste generated and disposed of in the Agua Mansa Landfill during operation of the Project is expected to be within the permitted capacity of the landfill. Therefore, the proposed Project would not create demands for solid waste services that would exceed the capabilities of the County's waste management system. Consequently, cumulative impacts associated with solid waste within the City would be considered less than significant. No mitigation is required.

6.4.19 Energy Conservation

Electricity and natural gas services are provided to the proposed Project and the cumulative development projects by RPU and the Southern California Gas Company (SCG), respectively. Therefore the geographic context for cumulative impacts to electricity is the City and the geographical context for cumulative impacts to natural gas is the service area of SCG. SCG's service area encompasses most of central and southern California.

9 Solid Waste, Public Facilities and Infrastructure Element, City of Riverside 2025 General Plan, amended November 2012.

10 Personal Phone Call with Riverside Transfer Center.

11 CalRecycle, Facility/Site Summary Details: Agua Mansa Landfill (36-AA-0019).

Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted building standards consistent with Title 24.

The proposed Project will comply with, and in some cases exceed, Title 24 standards for insulation, glazing, lighting, shading, and water and space-heating systems in all new construction. Through the use of modern energy-efficient construction materials and practices, incorporation of the Sustainability Features described in Section 4.18.4 and Table 4.18-C of this EIR, in addition to compliance with Title 24 standards, the proposed Project will be consistent with the State's energy conservation standards and, therefore would not conflict with an adopted energy conservation plan.

The cumulative development projects must also abide by the City's building standards and the provisions of Title 24, and in some instances may exceed the Title 24 guidelines for new construction. It is also reasonable to assume that one or more of the cumulative development projects will use energy-efficient construction materials and practices.

Both RPU and SCG have adequate energy supplies to serve the proposed Project, the cumulative development projects, and to meet existing demand in future years. RPU and SCG are both developing additional energy supplies to serve anticipated development in future years.

SCAG's 2016/2040 RTP/SCS actively encourages and creates incentives for energy efficiency to reduce energy costs, increase reliability and availability of electricity for the state, and reduce environmental impact. Additionally, the Riverside Restorative Growth Print - Climate Action Plan (RRG-CAP) includes energy measures designed to increase community-wide building and equipment efficiency and renewable energy use, and promote energy efficiency and renewable energy generation for use supporting municipal operations that support the community. As detailed in Section 4.10.5 of this EIR, the proposed Project is consistent with the City's *General Plan 2025* and SCAG's 2016 RTP/SCS for the purposes of encouraging and creating incentives for energy efficiency. Furthermore, as detailed in Section 4.7.5 of this EIR, with implementation of Mitigation Measures MM-GHG-1 and MM-GHG-2 designed to ensure energy efficiency in project design, construction and operation, the proposed Project is consistent with the City's RRG-CAP. The Project also provides and promotes alternatives to vehicular modes of travel, which will reduce car trips and result in efficient alternative transportation choices. Given these considerations, the proposed Project will not contribute to wasteful, inefficient, or unnecessary consumption of energy; conflict with existing energy standards and regulations; or place a significant demand on local and regional energy supplies or require a substantial amount of

additional capacity. No potentially significant cumulative effects related to energy conservation will result from the proposed Project. No additional mitigation is required.

THIS PAGE INTENTIONALLY LEFT BLANK

CHAPTER 7.0
PROJECT ALTERNATIVES

7.1 INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, environmental impact reports (EIRs) are required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (Section 15126.6(a)). The EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation" (Section 15126.6(a)). This alternatives discussion is required even if these alternatives "would impede to some degree the attainment of the project objectives, or would be more costly" (Section 15126.6(b)).

The inclusion of an alternative in an EIR does not constitute definitive evidence that the alternative is in fact "feasible." The final decision regarding the feasibility of alternatives lies with the decision-maker for a given project, who must make the necessary findings addressing the potential feasibility of an alternative, including whether it meets most of the basic project objectives or reduces the severity of significant environmental effects per CEQA (California Public Resources Code, Section 21081; see also Guidelines Section 15091).

7.2 PROJECT OBJECTIVES

In developing the alternatives to be addressed in this chapter, consideration was given to the ability to meet the basic objectives of the California Baptist University Specific Plan (CBUSP) Amendment (proposed Project) and eliminate or substantially reduce the identified significant environmental impacts contained in Chapter 4.0. As stated in Chapter 2.0 of this Draft EIR, the Project objectives and policies contained in the CBUSP Amendment from which the alternatives were analyzed include the following:

Objective 1:	Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.

Policy 1.1: Pursue the development program and campus improvements described in this Specific Plan while maintaining the flexibility needed to accommodate evolving academic and student needs and dynamic growth.

Objective 2:	Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping.

Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined herein.

Policy 2.2: *Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus.*

Policy 2.3: *Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.*

Objective 3:	Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities.

Policy 3.1: *Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum.*

Policy 3.2: *Provide a variety of safe and secure housing opportunities for students, including through the conversion of existing apartment units to student housing.*

Policy 3.3: *Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.*

Policy 3.4: *Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission.*

Policy 3.5: *Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.*

Objective 4:	Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus.

Policy 4.1: Ensure consistency with City of Riverside street standards, as may be modified, *regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus.*

Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus.

Policy 4.3: Accommodate the University's parking demand by providing parking in accordance with this Specific Plan.

Policy 4.4: Pursue the vacation of Diana Avenue to provide reasonable control over the access and vehicle speed along this southern campus edge.

Policy 4.5 Provide adequate and conveniently located bicycle racks throughout the campus.

Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission.

Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 3-3.

Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in this Specific Plan.

Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in this Specific Plan.

Policy 5.4: Establish a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.

Objective 6: Encourage environmentally sustainable development and operational practices.

Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long□term operating expenses consistent with City of Riverside building code requirements..

Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals.

Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements.

Policy 6.4: Implement sustainability measures that complement and support the City of Riverside Green Action Plan.

Objective 7:	Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community.

Policy 7.1: Provide opportunities for University/City partnerships for programming of events on campus.

Policy 7.2: Maintain an open-door policy for the community to experience cultural events, competitive sports, conferencing, and other events on campus.

Objective 8:	Provide technologies that allow the University to offer state-of-the-art instruction and research

Policy 8.1: Strive towards seamless access to information, resources, and services by creating *and maintaining a vanguard converged network infrastructure supporting voice, video, and data.*

Policy 8.2: Enhance student and faculty access by providing campus-wide wireless coverage.

Policy 8.3: Enrich student experience by leveraging technologies to improve operational efficiencies.

Policy 8.4: Stay abreast of emerging technologies by participating and partnering with relevant organizations in this ever-changing landscape.

Pursuant to the guidelines stated above, as well as the Project objectives and policies, a range of alternatives to the proposed Project is considered and evaluated in this DEIR. These alternatives were developed by the City of Riverside (City) in the course of Project planning, environmental review, and public input. In order to summarize these Project alternatives, as suggested in CEQA Section 15126.6(d), a matrix has been prepared to summarize and compare the impacts of each Project alternative (see Table 7.D, Comparison of Alternatives).

7.3 SUMMARY OF THE PROPOSED PROJECT'S ENVIRONMENTAL EFFECTS

Table 7.A summarizes the proposed Project's environmental effects under the environmental factors listed in Appendix F and G of the CEQA Guidelines.

Table 7.A
Environmental Effects of the Proposed Project

Environmental Factor		No Impact	Less than Significant Impact	Significant and Unavoidable Impact
Aesthetics	Scenic Vistas	—	X	—
	Scenic Highways	—	X	—
	Visual Character	—	X	—
	Light and Glare	—	X	—
	Cumulative	—	X	—
Agricultural and Forestry Resources	Conversion of Prime, Unique, or Statewide Important Farmland to Non-Agricultural Use	X	—	—
	Conflict with Agricultural Zoning or Williamson Act	X	—	—
	Conflict with Existing Forest Land Zoning or Cause Rezoning of Forest Land	X	—	—
	Conversion of Forest Land to Non-Forest Use	X	—	—
	Other Changes that would Convert Farmland or Forest Land	X		
	Cumulative	X	—	—
Air Quality	Conflict with or Obstruct an Air Quality Plan	—	X	—
	Violate an Air Quality Standard	—	X (MM)	—
	Result in Cumulatively Considerable Net Increase in any Criteria Pollutant	—	X	—
	Expose Sensitive Receptors to Substantial Pollutant Concentrations	—	X (MM)	—
	Create Objectionable Odors	—	X	—
	Cumulative	—	X (MM)	—
Biological Resources	Candidate, Non-listed Sensitive, or Special-Status Species	—	X (MM)	—
	Riparian Habitat or Other Sensitive Natural Communities	—	X	—
	Jurisdictional Waters/Wetlands	—	X	—
	Wildlife Movement and Migratory Species	—	X	—
	Adopted Policies and/or Ordinances	—	X (MM)	—

Table 7.A
Environmental Effects of the Proposed Project

Environmental Factor		No Impact	Less than Significant Impact	Significant and Unavoidable Impact
	Adopted habitat Conservation Plans	—	X	—
	Cumulative	—	X (MM)	—
Cultural Resources	Historic Resources	—	X	—
	Archaeological Resources	—	X (MM)	—
	Paleontological Resources	—	X	—
	Human Remains	—	X	—
	Cumulative	—	X (MM)	—
Geology and Soils	Fault Rupture	—	X	—
	Ground Shaking	—	X	—
	Seismic-Related Ground Failure	—	X (MM)	—
	Landslides and Rockfalls	—	X	—
	Soil Erosion or Loss of Topsoil	—	X	—
	Unstable Soils	—	X (MM)	—
	Expansive Soils	—	X (MM)	—
	Septic Tanks	X	—	—
	Cumulative	—	X (MM)	—
Greenhouse Gas Emissions	Greenhouse Gas Emissions	—	X	—
	Conflict with Applicable Plan Policy, or Regulation	—	X (MM)	—
	Cumulative	—	X (MM)	—
Hazards and Hazardous Materials	Routine Transport, use, or Disposal of Hazardous Materials	—	X	—
	Reasonably Foreseeable Upset and Accident Conditions	—	X (MM)	—
	Emit Hazards Near Existing or Proposed School	—	X	—
	Located on a Listed Hazardous Materials Site	—	X (MM)	—
	Within an Airport Land Use Plan or Within Two Miles of a Public Airport	—	X (MM)	—
	Within Vicinity of a Private Airport	X		—
	Conflict with Emergency Response Plans	—	X	—
	Wildland Fire Risks	X	—	—
	Cumulative	—	X (MM)	—
Hydrology and Water Quality	Water Quality Standards or Waste Discharge Requirements	—	X	—
	Groundwater	—	X	—

Table 7.A
Environmental Effects of the Proposed Project

Environmental Factor		No Impact	Less than Significant Impact	Significant and Unavoidable Impact
	Alter Drainage Resulting in Erosion or Siltation Offsite	—	X	—
	Alter Drainage or Increase of Surface Runoff Resulting in Flooding On- or Off-site	—	X	—
	Runoff Exceeding Capacity of Existing or Planned Facilities	—	X	—
	Otherwise Degrade Water Quality	—	X	—
	Place Housing in Flood Hazard Areas	X	—	—
	Place Structures that Impede or Redirect Flood Flows	X	—	—
	Dam Inundation Impacts	—	X	—
	Inundation by Seiche, Tsunami, or Mudflow	—	X	—
	Cumulative	—	X	—
Land Use and Planning	Physically Divide an Established Community	—	X	—
	Conflict with Applicable Land Use Plans, Policies, or Regulations	—	X	—
	Conflict with Any Applicable Habitat or Natural Community Conservation Plan	—	X	—
	Cumulative	—	X	—
Mineral Resources	Loss of Statewide or Regional Important Mineral Resources	X	—	—
	Loss of Locally Important Mineral Resources	X	—	—
	Cumulative	X	—	—
Noise	Exposure of Persons or Generation of Noise in Excess of Standards Established by the General Plan or Noise Ordinance	—	X (MM)	—
	Groundborne Vibration	—	X (MM)	—
	Substantial Permanent Increase in Ambient Noise	—	X (MM)	—
	Substantial Temporary or Periodic Increase in Ambient Noise	—	X (MM)	—
	Exposure to Excessive Noise from Public Airport	—	X	—
	Exposure to Excessive Noise from Private Airport	—	X	—
	Cumulative	—	X (MM)	—

Table 7.A
Environmental Effects of the Proposed Project

Environmental Factor		No Impact	Less than Significant Impact	Significant and Unavoidable Impact
Population and Housing	Population Growth	—	X	—
	Displace Housing	—	X	—
	Displace People	—	X	—
	Cumulative	—	X	—
Public Services	Police Protection Facilities	—	X	—
	Fire Protection Facilities	—	X	—
	School Facilities	X	—	—
	Library Facilities	—	X	—
	Other Facilities	—	X	—
	Cumulative	—	X	—
Recreation	Existing Recreational and Park Facilities	—	X	—
	New or Physically Altered Recreation and Park Facilities	—	X	—
	Cumulative	—	X	—
Transportation and Traffic	Conflict with Applicable Plan, Ordinance, or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System	—	—	X (MM)
	Conflict with Applicable Congestion Management Program	—	—	X (MM)
	Air Traffic Patterns	—	X	—
	Design Features or incompatible Uses	—	X	—
	Inadequate Emergency Access	—	X	—
	Public Transit, Bicycle, or Pedestrian Facilities	—	X	—
	Cumulative	—	—	X (MM)
Tribal Cultural Resources	Listed or Eligible Tribal Cultural Resources	—	X	—
	Lead Agency Defined Tribal Cultural Resources	—	X	—
	Cumulative	—	X	—
Utilities and Service Systems	Wastewater Treatment Requirements	—	X	—
	Require Construction of Additional Water and/or Wastewater Treatment Facilities	—	X	—
	Require Construction of Additional Storm Water Drainage Facilities	—	X	—
	Sufficient Water Supplies	—	X	—
	Wastewater Treatment Capacity	—	X	—
	Sufficient Landfill Capacity	—	X	—

Table 7.A
Environmental Effects of the Proposed Project

Environmental Factor		No Impact	Less than Significant Impact	Significant and Unavoidable Impact
	Solid Waste Regulations	—	X	—
	Cumulative	—	X	—
Energy Conservation	Wasteful, Inefficient, or Unnecessary Consumption of Energy	—	X	—
	Conflict Energy Standards and Regulations	—	X	—
	Significant Demand on Local and Regional Energy Supplies	—	X	—
	Cumulative	—	X	—

The analysis provided in Section 4.0 determined that, despite the implementation of mitigation measures, significant environmental impacts would result from the proposed Project. To satisfactorily provide the CEQA mandated alternatives analysis, the alternatives considered must reduce or eliminate at least one of the following significant impacts:

- Traffic: Project Specific and Cumulative Local Intersection and Ramp Level of Service Impacts; and
- Traffic: Project Specific and Cumulative Freeway Segment and Merge/Diverge Area Level of Service Impacts.

7.4 ALTERNATIVES SELECTION

Pursuant CEQA Guidelines Section 15126.6, an EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives" (Section 15126.6(a)). The EIR "must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation" (Section 15126.6(a)). This alternatives discussion is required even if these alternatives "would impede to some degree the attainment of the project objectives, or would be more costly" (Section 15126.6(b)).

The proposed Project is an Amendment to the CBUSP to provide the necessary foundational planning and programmatic environmental clearance to allow an increase in student enrollment at the University from the current limitation of approximately 9,200 students in year 2025 to 12,000 students. To accommodate this growth in student enrollment, the CBUSP envisions:

400,000 square feet of additional administrative, academic, recreational, residential and athletic building space; two new parking structures (485,000 square feet and 320,000 square feet); and improved baseball, softball and soccer stadiums.

The City considered and rejected four alternatives because they could not accommodate the basic objectives of the proposed Project objects. These include an offsite location alternative, reduced building area alternative, densification alternative, and no additional housing or building alternative. The reason each was rejected is discussed as follows.

Offsite Location. The proposed Project is an expansion of an existing, private University, and an offsite alternative would not be able to meet any of the Project objectives. Although a private University, the CBU campus is traditional in nature and does not lend itself to offsite or satellite locations. For these reasons, an offsite location alternative was rejected from further consideration.

Reduced Intensity – Reduced Building Area. This alternative would maintain the growth in enrollment to 12,000 students in year 2025 while reducing supporting administrative, academic, recreational, residential and athletic building space by 50 percent. Under this alternative, new building space would be reduced from 400,000 square feet to 200,000 square feet, the new 485,000 square foot East Parking Structure would be reduced to 242,500 square feet, and the new 320,000 square foot West Parking Structure would be reduced to 160,000 square feet. However, CBU is experiencing high demand to grow to accommodate increased enrollment demand ultimately caused by the expansion of the University's academic fields of study and move towards NCAA Division I athletics. The CBUSP includes the new building area and parking structures to accommodate the increased enrollment. For these reasons, the reduced building area alternative was rejected from further consideration.

Reduced Intensity – Building Elimination. This alternative would maintain the growth in enrollment to 12,000 students in year 2025 while eliminating construction of additional administrative, academic, recreational, residential and athletic building space. Under this alternative, all of the 400,000 square feet of additional building space and the new 485,000 and 320,000 square foot parking structures would be eliminated. However, CBU is experiencing high demand to grow to accommodate increased enrollment demand ultimately caused by the expansion of the University's academic fields of study and move towards NCAA Division I athletics. The CBUSP includes the new building area and parking structures to accommodate the increased enrollment. Similar to the reduced building area alterative, the building elimination alternative was rejected from further consideration.

Expansion/Densification Alternative. This alternative would allow development within the open space and detention basin areas of the CBUSP along Magnolia Boulevard. In so doing, this

alternative would meet all of the Project objectives and result in a more compact and dense on-campus development patter promoting pedestrian and bicycle modes of travel and associated reductions in traffic, air quality, and greenhouse gas emissions impacts. However, the Magnolia Lawn is a protected historic open space and a component of the CBU Historic District. The CBU campus and the CBUSP Amendment relies on the function of the detention basin to manage surface flows and to meet state and regional water quality mandates. For these reasons, the Expansion/densification alternative was rejected from further consideration.

7.5 ALTERNATIVES UNDER CONSIDERATION

This section discusses two alternatives to the proposed Project, including the No Project Alternative and the Increase Student Housing Alternative. The No Project Alternative, which is a required element of an EIR pursuant to Section 15126.6(e) of the CEQA Guidelines, examines the environmental effects that would occur if the Project were not to proceed. The Increase Student Housing Alternative is discussed as part of the "reasonable range of alternatives" selected by the lead agency. The alternatives addressed in this section are listed below:

- No Project Alternative – Implementation the 2013 Approved CBUSP.
- Alternative 1 – Increased Student Housing.

The City, acting as the CEQA Lead Agency, is responsible for selecting a range of Project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. The range of alternatives addressed in an EIR is governed by a "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. Of the alternatives considered, the EIR need examine in detail only those the Lead Agency determines could feasibly attain most of the basic objectives of the Project but would avoid or substantially lessen any of the significant effects of the proposed Project. Per CEQA Guidelines Section 15364, "feasible" has been defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, and environmental, legal, social, and technological factors."

Other than the No Project Alternative, Alternative 1 - Increased Student Housing was chosen for its ability to reduce or avoid the significant and unavoidable impacts associated with implementation of the proposed CBUSP Amendment. Alternative 1 would result in closer proximity between student housing and University classrooms, offices, and administrative functions and promote pedestrian and bicycle modes of travel. This alternative would result in the addition of approximately 1,100 new beds within the CBU campus (i.e., the CBU SP Zone). In this way, vehicular trip generation would be reduced. Although the resulting decrease in vehicle trips would reduce Project traffic impacts, the offsite improvements detailed in mitigation measures TRA-1 through TRA-5 would still be required. This alternative would also

create the environmental benefit of reducing air pollution and greenhouse gas emissions corresponding to the reduction in vehicular trips even though mitigation measures for these emissions was not needed. Nonetheless, the City has evaluated the Increased Student Housing Alternative due to the reduction in trip generation and air pollution/ GHG emissions as well as the No Project Alternative.

7.5.1 No Project Alternative

The No Project Alternative assumes that the proposed CBUSP Amendment would not be implemented and of the CBU campus would be governed by the existing CBUSP approved in 2013. As such, the University would be constrained by the student enrollment cap of 9,200 students set forth in the existing CBUSP. CBU is nearly at that student enrollment as of 2017. The proposed Project is considered necessary in order to meet the growth and development goals of CBU. This alternative would not meet the single most important of the Project's objectives; however, CEQA requires the alternative to be analyzed.

Aesthetics

As discussed in Chapter 4.1 Aesthetics, the proposed Project would not conflict with scenic vistas or scenic highways, conflict with the visual character of the Project site or surroundings, or produce substantial sources of light and glare. The No Project Alternative would result in less development on the CBU campus, with the same level of impacts regarding conflicts with scenic vistas or scenic highways, conflicts with the visual character of the Project site or surroundings. With less development, potential light and glare impacts would be slightly reduced under the No Project Alternative but impacts would remain unchanged at less than significant.

Agriculture and Forestry Resources

As discussed in Chapter 4.2 Agriculture and Forestry Resources, the proposed Project would result in no impact regarding: conversion of prime, unique, or statewide important farmland to non-agricultural use; conflicts with agricultural zoning or Williamson Act; conflict with existing forest land zoning or cause rezoning of forest land; conversion of forest land to non-forest use; or other changes that would convert farmland or forest land. The No Project Alternative would result in less development on the CBU campus; however impacts to agricultural and forestry resources would remain unchanged at no impact.

Air Quality

As discussed in Chapter 4.3, Air Quality, the proposed Project would not: conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standards; result in cumulatively considerable net increase in any criteria pollutant; expose sensitive receptors to substantial pollutant concentrations; or create objectionable odors. The Project

would generate short-term construction and long-term operational emissions, which would all be at levels below applicable air quality standards. The No Project Alternative would generate the same level of short-term construction emissions as the proposed Project because new development on the CBU campus would occur under the approved CBUSP even if the proposed CBUSP Amendment does not move forward. Although there would be less overall development on the CBU campus under the No Project Alternative, the daily construction emissions for any given increment of development would be the same. Operational emissions under the No Project Alternative would be reduced because less overall development would occur on the CBU campus. All impacts would remain unchanged at less than significant, although operational emission would be reduced and impacts associated with regional emissions, criteria pollutants, exposure to sensitive receptors would be reduced.

Biological Resources

As described in Chapter 4.4, Biological Resources, the proposed Project would produce a less than significant impact regarding riparian or other sensitive habitats, jurisdictional waters/wetlands, wildlife movement and migratory species, and adopted policies and/or ordinances, and adopted habitat conservation plans. Impacts to candidate, non-listed sensitive or special-status species (i.e., nesting birds) were determined to be less than significant with implementation of mitigation. The No Project Alternative would result in development on the Project site, albeit to a lesser degree. The potential direct impacts to nesting birds would also occur under the No Project Alternative and the same mitigation would be required. Because future development under No Project Alternative could occur at any location on the CBU campus, impacts to biological resources would be the same as compared to the proposed Project.

Cultural Resources

As described in Chapter 4.5, Cultural Resources, the proposed Project would produce a less than significant impact regarding historic resources, paleontological resources, and human remains. Impacts to archaeological resources (i.e., unanticipated discovery of archaeological resources during grading) were determined to be less than significant with implementation of mitigation. The No Project Alternative would result in the nearly same footprint of development on the Project site (i.e., less the Health Sciences buildings located west of Monroe Street not in the existing CBUSP Planning Area), albeit to a lesser degree due to the lower student growth and building area included in the existing CBUSP. The potential direct impacts to archaeological resources would also occur under the No Project Alternative and the same mitigation would be required. Because future development under No Project Alternative could occur at any location on the CBU campus potentially affecting significant archaeological resources, impacts would be the same as compared to the proposed Project and the same mitigation would be required to reduce the impact to less than significant.

Geology and Soils

As described in Chapter 4.6, Geology and Soils, the proposed Project would produce a less than significant impact regarding fault rupture, ground shaking, landslides and rockfalls, soil erosion or loss of topsoil, and septic tanks. Impacts regarding seismic-related ground failure, unstable soils, and expansive soils were determined to be less than significant with implementation of mitigation (i.e., site specific geotechnical/soils report). The No Project Alternative would result in development on the Project site, albeit to a lesser degree. The potential direct impacts regarding geology and soils would also occur under the No Project Alternative and the same mitigation would be required. Because future development under No Project Alternative could occur at any location on the CBU campus, impacts to geology and soils would be the same as compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Chapter 4.7, Greenhouse Gas Emissions, the Project would emit greenhouse gases (GHGs) during construction and operations, but emissions would not be cumulatively considerable. Impacts regarding conflicts with an approved GHG reduction plan, policy, or regulation were determined to be less than significant with implementation of mitigation (i.e., meet or exceed Title 24 energy efficiency standards; implement water conservation measures). Under the No Project Alternative, there would be reduced development and therefore GHG emissions would be less and would not be cumulatively considerable as for the proposed Project. Therefore, the No Project Alternative would result in the same significance regarding GHG emissions impacts, although GHG emissions would be reduced in comparison to the proposed Project.

Hazards and Hazardous Materials

As discussed in Chapter 4.8, Hazards and Hazardous Materials, the proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; conflicts with emergency response plans; and wildland fire risks. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant with implementation of mitigation (i.e., site specific Phase I Hazardous Materials Report; building specific lead-based paint, asbestos, and organochlorine pesticide surveys; Riverside Municipal Airport ALUP building height restrictions). Under the No Project Alternative, there would be reduced development; however, impacts associated with hazards and hazardous materials would be the same as for the proposed Project.

Hydrology and Water Quality

As discussed in Chapter 4.9, Hydrology and Water Quality, the proposed Project would produce no impact or a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Under the No Project Alternative, there would be reduced development. However, impacts associated with hydrology and water quality would be mitigated to less than significant via adherence to existing rules and regulations regarding water quality, the same as for the proposed Project.

Land Use and Planning

As discussed in Chapter 4.10, Land Use and Planning, the proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under the No Project Alternative, development on the CBU campus would be governed by the existing CBUSP and impacts associated with land use and planning would be less than significant. Impacts associated with land use and planning would be the same as for the proposed Project.

Mineral Resources

As discussed in Chapter 4.11, Mineral Resources, the proposed Project would produce a less than significant impact regarding loss of state, regionally, and locally important mineral resources. Under the No Project Alternative, impacts associated with mineral resources would also be less than significant. Impacts associated with mineral resources would be the same as for the proposed Project.

Noise

As discussed in Chapter 4.12, Noise, the proposed Project would produce a less than significant impact regarding exposure to excessive public or private airport noise. Impacts regarding noise in excess of standards established by the General Plan or noise ordinance, groundborne vibration, substantial permanent increase in ambient noise, and substantial temporary or periodic increase in ambient noise were determined to be less than significant with implementation of mitigation (i.e., construction noise attenuation; site specific noise studies; HVAC noise attenuation; and vibration attenuation for historic structures). The No Project Alternative would result in less development on the CBU campus, but implementation of the construction noise attenuation, site specific noise studies, HVAC noise attenuation, and vibration studies would be required. With

mitigation, the No Project Alternative and proposed Project would result in less than significant noise impacts.

Population and Housing

As discussed in Chapter 4.13, Population and Housing, the proposed Project would produce a less than significant impact regarding population growth, displacement of housing, and displacement of people. The No Project Alternative would result in less development on the CBU campus, but impacts regarding population and housing would be the same as in comparison to the proposed Project.

Public Services

As discussed in Chapter 4.14, Public Services, the proposed Project would produce no impact or a less than significant impact regarding new or renovated police protection facilities, fire protection facilities, school facilities, library facilities, or other public facilities. The No Project Alternative would result in less development on the CBU campus, but demand for public services would occur. Similar to the proposed Project, the demand for public services under the No Project Alternative would not result in the need for new or expanded public services facilities the construction of which would produce a significant impact on the environment. Impacts regarding public services would be the same as compared to the proposed Project.

Recreation

As discussed in Chapter 4.15, Recreation, the proposed Project would produce a less than significant impact regarding new or renovated recreational and park facilities. The No Project Alternative would result in less development on the CBU campus, and less demand on public parks. However, impacts regarding recreation would be less than significant, the same as for proposed Project.

Transportation/Traffic

As described in Chapter 4.16, Traffic, the proposed Project would produce a less than significant impact related to: air traffic patterns: design features or incompatible uses: emergency access; and public transit, bicycle, or pedestrian facilities. Impacts regarding conflicts with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and conflicts with the applicable congestion management program would be reduced with implementation of mitigation (i.e., offsite roadway improvements), but impacts to City intersections and roadways, SR-91 ramps, and SR-91 merge/diverge locations would remain significant and unavoidable. The No Project Alternative would result in less development on the CBU campus, and traffic impacts would be fully mitigated by implementation of the prior mitigation measures established as part of the existing CBUSP approval in 2013. Impacts regarding traffic would be eliminated in comparison to the proposed Project.

Tribal Cultural Resources

As discussed in Chapter 4.17, Tribal Cultural Resources, the proposed Project would produce a less than significant impact regarding listed or eligible tribal cultural resources and lead agency defined tribal cultural resources. The No Project Alternative would result in the nearly same footprint of development on the Project site (i.e., less the Health Sciences buildings located west of Monroe Street not in the existing CBUSP Planning Area), albeit to a lesser degree due to the lower student growth and building area included in the existing CBUSP. Development under the No Project Alternative could occur at any location on the CBU campus; however, impacts would be less than significant under the No Project Alternative. Impacts would be the same as compared to the proposed Project.

Utilities and Service Systems

As discussed in Chapter 4.18, Utilities and Service Systems, the proposed Project would produce no impact or a less than significant impact regarding wastewater treatment requirements, construction of additional water and/or wastewater treatment facilities, construction of additional storm water drainage facilities, water supplies, wastewater treatment capacity, landfill capacity, and solid waste regulations. The No Project Alternative would result in less development on the CBU campus, but demand for utility services would occur. Similar to the proposed Project, the demand for utility services under the No Project Alternative would not result in the need for new or expanded utilities the construction of which would produce a significant impact on the environment. Impacts regarding utilities would be less than significant, the same as for the proposed Project.

Energy Conservation

As discussed in Chapter 4.19, Energy Conservation, the proposed Project would produce a less than significant impact regarding: consumption of energy; conflicts with energy standards and regulations; and significant demand on local and regional energy supplies. The No Project Alternative would result in less development on the CBU campus, but demand for energy would occur. Similar to the proposed Project, the demand for energy under the No Project Alternative would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation would be less than significant, the same as for the proposed Project.

Relationship to Project Objectives and Feasibility

Under the No Project Alternative, the existing CBUSP would guide future development on the CBU campus. The No Project Alternative would result in the nearly same footprint of development on the Project site (i.e., less the Health Sciences buildings located west of Monroe

Street not in the existing CBUSP Planning Area), albeit to a lesser degree due to the lower student growth and building area included in the existing CBUSP.

Meets Project Objectives

Table 7.B provides a list of the Project objectives and whether or not the alternative meets each objective.

Table 7.B
Summary of No Project Alternative Success at Meeting Project Objectives

Project Objective and Policies	Alternative Meets Objective?
Objective 1: Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025. Policy 1.1: Pursue the development program and campus improvements described in this Specific Plan while maintaining the flexibility needed to accommodate evolving academic and student needs and dynamic growth.	**No.** The No Project Alternative will not result in housing, buildings and other facilities to support planned student enrollment of 12,000 students by year 2025. The CBU campus would grow to 9,200 student enrollment under the existing CBUSP.
Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping. Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards and design guidelines outlined herein. Policy 2.2: Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus. Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.	**Yes.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP regulates architecture, signage, and landscaping in a manner that promotes campus identified similar to the proposed Project.
Objective 3: Provide an enhanced CBU campus that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities. Policy 3.1: Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum. Policy 3.2: Provide a variety of safe and secure housing opportunities for students, including through the conversion of existing apartment units to student housing. Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes.	**No.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP provides an enhanced CBU campus setting for existing students. However, because curriculum for higher education is dynamic and tied to demand and changing technologies, the No Project Alternative will inhibit the University's ability to develop and offer curriculum based on the development limitations inherent in the adopted SP. For these reasons, the No Project Alternative would not attract prospective students and their parents.

Table 7.B
Summary of No Project Alternative Success at Meeting Project Objectives

Project Objective and Policies	Alternative Meets Objective?
Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission. Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.	
Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus. Policy 4.1: Ensure consistency with City of Riverside street standards, as may be modified, regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus. Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus. Policy 4.3: Accommodate the University's parking demand by providing parking in accordance with this Specific Plan. Policy 4.4: Pursue the vacation of Diana Avenue to provide reasonable control over the access and vehicle speed along this southern campus edge. Policy 4.5: Provide adequate and conveniently located bicycle racks throughout the campus.	**Yes.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP accommodates diverse modes of mobility for students, staff, and visitors.
Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission. Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 3-3. Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in this Specific Plan. Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in this Specific Plan. Policy 5.4: Establish a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.	**Yes.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains provisions that ensure historic resources are treated and preserved in the same manner as the CBUSP Amendment.
Objective 6: Encourage environmentally sustainable development and operational practices.	**Yes.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP

Table 7.B
Summary of No Project Alternative Success at Meeting Project Objectives

Project Objective and Policies	Alternative Meets Objective?
Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside building code requirements. Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals. Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements. Policy 6.4: Implement sustainability measures that complement and support the City of Riverside Green Action Plan.	contains provisions that encourage environmentally sustainable development and operational practices in the same manner as the CBUSP Amendment.
Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community. Policy 7.1: Provide opportunities for University/City partnerships for programming of events on campus. Policy 7.2: Maintain an open-door policy for the community to experience cultural events, competitive sports, conferencing, and other events on campus.	**Yes.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains objectives to enhance the positive image and relationship of CBU with the City of Riverside in the same manner as the CBUSP Amendment.
Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research. Policy 8.1: Strive towards seamless access to information, resources, and services by creating and maintaining a vanguard converged network infrastructure supporting voice, video, and data. Policy 8.2: Enhance student and faculty access by providing campus-wide wireless coverage. Policy 8.3: Enrich student experience by leveraging technologies to improve operational efficiencies. Policy 8.4: Stay abreast of emerging technologies by participating and partnering with relevant organizations in this ever-changing landscape.	**Yes.** The No Project Alternative will result in development of the CBU campus in accordance with the existing CBUSP. The existing CBUSP contains provisions that will provide facilities and staff that allow the University to offer state-of-the-art instruction and research in the same manner as the CBUSP Amendment.

The No Project Alternative would reduce impacts to most resource areas relative to the proposed Project, including elimination of the significant and unavoidable traffic impacts. The No Project Alternative would meet all but two of the Project's objectives, with the two exceptions being Objectives 1 and 3. Objective 1 is the single most important Project objective. Objective 1 is to: *Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.* Objective 3 is to: *Provide an enhanced CBU campus setting that attracts prospective students and their*

parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities. Because the No Project Alternative does not meet the single most important objective (Objective 1) and would not enhance CBU's attraction and stature to prospective students and other universities and facilities (Objective 3), this alternative has been eliminated from further consideration and is determined to be not feasible.

7.5.2 Alternative 1 - Increased Student Housing

The Increased Student Housing Alternative assumes that the proposed CBUSP Amendment would be implemented. In support of the increase in enrollment to 12,000 students, the proposed Project and Increased Student Housing Alternative would result in: 400,000 square feet of additional administrative, academic, recreational, residential and athletic building space within a fixed campus area of 167 acres. In contrast to the proposed Project, this Alternative would accommodate increased demand for additional student housing on the CBU campus. In this manner, the projected student housing needs of 1,100 additional student beds would take place over and above the construction of 400,000 square feet of additional building area, two new parking structures (485,000 square feet and 320,000 square feet), and improved athletic stadiums. The Increased Student Housing Alternative was chosen for its potential to reduce traffic, air quality, and greenhouse gas emissions impacts associated with implementation of the proposed CBUSP Amendment. This Alternative would result in closer proximity between student housing and CBU classrooms, offices, and administrative areas and therefore promote pedestrian and bicycle modes of travel. In this way, the Increased Student Housing Alternative would result in reduced trip making and reduced traffic, air pollution emissions, and GHG emissions impacts. The proposed Project is considered necessary in order to meet the growth and development goals of CBU.

The increase of 1,100 student beds would generate demand for 770 additional parking spaces based on 0.7 spaces per student (1,100 × 0.7 = 770), which would require at least one additional parking structure. The increase of 1,100 beds would require additional provisions for residential space, food service, security, and health care. Although the 1,100 beds would occur above and beyond the provision of 400,000 square feet of additional building area, the campus area is fixed at 167 acres. Moreover, existing restrictions by the Airport Land Use Commission limit building heights to 100 feet or lower, serving to limit the vertical extent that development may be allowed. This Alternative would create tension between the ability to provide space for academic development consistent with Project Objective 1 and the burden of providing space for the additional facilities to support the increased student housing.

Aesthetics

As discussed in Chapter 4.1 Aesthetics, the proposed Project would not conflict with scenic vistas or scenic highways, conflict with the visual character of the Project site or surroundings, or

produce substantial sources of light and glare. The Increased Student Housing Alternative would result in more development on the CBU campus, with the same level of impacts regarding conflicts with scenic vistas or scenic highways, conflicts with the visual character of the Project site or surroundings. With more development, potential light and glare impacts would be slightly increased under the Increased Student Housing Alternative but impacts would remain unchanged at less than significant.

Agriculture and Forestry Resources

As discussed in Chapter 4.2 Agriculture and Forestry Resources, the proposed Project would result in no impact regarding: conversion of prime, unique, or statewide important farmland to non-agricultural use; conflicts with agricultural zoning or Williamson Act; conflict with existing forest land zoning or cause rezoning of forest land; conversion of forest land to non-forest use; or other changes that would convert farmland or forest land. The Increased Student Housing Alternative would result in more development on the CBU campus; however impacts to agricultural and forestry resources would remain unchanged at no impact.

Air Quality

As discussed in Chapter 4.3, Air Quality, the proposed Project would not: conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standards; result in cumulatively considerable net increase in any criteria pollutant; expose sensitive receptors to substantial pollutant concentrations; or create objectionable odors. The Project would generate short-term construction and long-term operational emissions, which would all be at levels below applicable air quality standards. The Increased Student Housing Alternative would generate the same level of short-term construction emissions as the proposed Project because new development on the CBU campus would occur in the same manner as the proposed Project. Although there would be more overall development on the CBU campus under the Increased Student Housing Alternative, the daily construction emissions for any given increment of development would be the same. Operational emissions would be reduced because the Increased Student Housing Alternative would result in a denser development pattern in comparison to the proposed Project. The denser development pattern would be created by the Alternative's accommodation of student bed demand on campus and in close proximity to existing and future academic, administrative, and office facilities resulting in reductions in both trip generation and air pollution emissions. Even though the quantity of operational emissions and impacts associated with regional emissions, criteria pollutants, and exposure to sensitive receptors would be reduced, the significance of impacts would remain unchanged at less than significant.

Biological Resources

As described in Chapter 4.4, Biological Resources, the proposed Project would produce a less than significant impact regarding riparian or other sensitive habitats, jurisdictional waters/wetlands, wildlife movement and migratory species, and adopted policies and/or ordinances, and adopted habitat conservation plans. Impacts to candidate, non-listed sensitive or special-status species (i.e., nesting birds) were determined to be less than significant with implementation of mitigation. The Increased Student Housing Alternative would result in more development and in a denser manner on the Project site. The potential direct impacts to nesting birds would also occur under the Increased Student Housing Alternative and the same mitigation would be required. Because future development under Increased Student Housing Alternative could occur at any location on the CBU campus, impacts to biological resources would be the same as compared to the proposed Project.

Cultural Resources

As described in Chapter 4.5, Cultural Resources, the proposed Project would produce a less than significant impact regarding historic resources, paleontological resources, and human remains. Impacts to archaeological resources (i.e., unanticipated discovery of archaeological resources during grading) were determined to be less than significant with implementation of mitigation. The Increased Student Housing Alternative would result in the same footprint of development on the Project site, albeit at a more dense level due to the additional student beds included in the Alternative. The potential direct impacts to archaeological resources would also occur under the Increased Student Housing Alternative and the same mitigation would be required. Because future development under Increased Student Housing Alternative could occur at any location on the CBU campus potentially affecting significant archaeological resources, impacts would be the same as compared to the proposed Project and the same mitigation would be required to reduce the impact to less than significant.

Geology and Soils

As described in Chapter 4.6, Geology and Soils, the proposed Project would produce a less than significant impact regarding fault rupture, ground shaking, landslides and rockfalls, soil erosion or loss of topsoil, and septic tanks. Impacts regarding seismic-related ground failure, unstable soils, and expansive soils were determined to be less than significant with implementation of mitigation (i.e., site specific geotechnical/soils report). The No Project Alternative would result in development on the Project site, albeit to a lesser degree. The potential direct impacts regarding geology and soils would also occur under the Increased Student Housing Alternative and the same mitigation would be required. Because future development under Increased Student Housing Alternative could occur at any location on the CBU campus, impacts to geology and soils would be the same as compared to the proposed Project.

Greenhouse Gas Emissions

As discussed in Chapter 4.7, Greenhouse Gas Emissions, the Project would emit greenhouse gases (GHGs) during construction and operations, but emissions would not be cumulatively considerable. Impacts regarding conflicts with an approved GHG reduction plan, policy, or regulation were determined to be less than significant with implementation of mitigation (i.e., meet or exceed Title 24 energy efficiency standards; implement water conservation measures). Under the Increased Student Housing Alternative, there would be increased development. However, GHG emissions would be reduced because the Increased Student Housing Alternative would result in a denser development pattern in comparison to the proposed Project including accommodation of student beds on campus and in close proximity to existing and future academic, administrative, and office facilities resulting in reductions in both trip generation and GHG emissions. Even though the quantity of GHG emissions would be reduced in comparison to the proposed Project, the Increased Student Housing Alternative would result in the same less than significant determination regarding GHG emissions impacts with implementation of Project Design Features contained in the CBUSP Amendment and implementation of mitigation measures MM-GHG-1 and MM-GHG-2.

Hazards and Hazardous Materials

As discussed in Chapter 4.8, Hazards and Hazardous Materials, the proposed Project would produce a less than significant impact regarding: routine transport, use, or disposal of hazardous materials; emitting hazards near existing or proposed school; conflicts with emergency response plans; and wildland fire risks. Impacts regarding reasonably foreseeable upset and accident conditions, hazardous materials, location within an airport land use plan or within two miles of a public airport, and proximity to a private airport were determined to be less than significant with implementation of mitigation (i.e., site specific Phase I Hazardous Materials Report; building specific lead-based paint, asbestos, and organochlorine pesticide surveys; Riverside Municipal Airport ALUP building height restrictions). The Increased Student Housing Alternative would result in the same impacts regarding hazards impacts and implementation the same mitigation measures would be required.

Hydrology and Water Quality

As discussed in Chapter 4.9, Hydrology and Water Quality, the proposed Project would produce no impact or a less than significant impact regarding: water quality standards or waste discharge requirements; groundwater; alter drainage resulting in erosion or siltation offsite; alter drainage or increase of surface runoff resulting in flooding on- or off-site; runoff exceeding capacity of existing or planned facilities; otherwise degrade water quality; place housing in flood hazard areas; place structures that impede or redirect flood flows; dam inundation impacts; and inundation by seiche, tsunami, or mudflow. Under the Increased Student Housing Alternative, there would be increased development. However, impacts associated with hydrology and water

quality would be mitigated to less than significant via adherence to existing rules and regulations regarding water quality, the same as for the proposed Project.

Land Use and Planning

As discussed in Chapter 4.10, Land Use and Planning, the proposed Project would produce a less than significant impact regarding: dividing an established community; conflicts with applicable land use plans, policies, or regulations; and conflict with any applicable habitat or natural community conservation plan. Under the Increased Student Housing Alternative, development on the CBU campus would be governed by the CBUSP Amendment but at a denser level. Impacts associated with land use and planning would be less than significant, the same as for the proposed Project.

Mineral Resources

As discussed in Chapter 4.11, Mineral Resources, the proposed Project would produce a less than significant impact regarding loss of state, regionally, and locally important mineral resources. Under the Increased Student Housing Alternative, impacts associated with mineral resources would also be less than significant. Impacts associated with mineral resources would be the same as for the proposed Project.

Noise

As discussed in Chapter 4.12, Noise, the proposed Project would produce a less than significant impact regarding exposure to excessive public or private airport noise. Impacts regarding noise in excess of standards established by the General Plan or noise ordinance, groundborne vibration, substantial permanent increase in ambient noise, and substantial temporary or periodic increase in ambient noise were determined to be less than significant with implementation of mitigation (i.e., construction noise attenuation; site specific noise studies; HVAC noise attenuation; and vibration attenuation for historic structures). The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and place more sensitive receptors (i.e., student housing) on campus within a compact area. This would introduce greater restrictions on construction and operational noise to protect this increased number of sensitive receptors. Implementation of construction noise attenuation, site specific noise studies, HVAC noise attenuation, and vibration studies would be required to ensure resulting noise levels at the student housing locations are within the Municipal Code levels and/or other specified performance standards. With this additional mitigation, the Increased Student Housing Alternative would result in less than significant noise impacts in a similar manner to the proposed Project.

Population and Housing

As discussed in Chapter 4.13, Population and Housing, the proposed Project would produce a less than significant impact regarding population growth, displacement of housing, and displacement of people. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, including additional student housing over and above that permitted by the proposed Project. Impacts regarding population and housing would be less than significant, the same as for the proposed Project.

Public Services

As discussed in Chapter 4.14, Public Services, the proposed Project would produce no impact or a less than significant impact regarding new or renovated police protection facilities, fire protection facilities, school facilities, library facilities, or other public facilities. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus and a similar demand for public services as the proposed Project. Similar to the proposed Project, the demand for public services under the Increased Student Housing Alternative would not result in the need for new or expanded public services facilities the construction of which would produce a significant impact on the environment. Impacts regarding public services would be the same as compared to the proposed Project.

Recreation

As discussed in Chapter 4.15, Recreation, the proposed Project would produce a less than significant impact regarding new or renovated recreational and park facilities. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and a similar demand on public parks. However, impacts regarding recreation would be less than significant, the same as for proposed Project.

Transportation/Traffic

As described in Chapter 4.16, Traffic, the proposed Project would produce a less than significant impact related to: air traffic patterns: design features or incompatible uses: emergency access; and public transit, bicycle, or pedestrian facilities. Impacts regarding conflicts with applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system and conflicts with the applicable congestion management program would be reduced with implementation of mitigation (i.e., offsite roadway improvements), but impacts to City intersections and roadways, SR-91 ramps, and SR-91 merge/diverge locations would remain significant and unavoidable. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, including additional student housing over and above that permitted by the proposed Project. However, trip generation would be reduced because the Increased Student Housing Alternative would accommodate student housing on campus and in

close proximity to existing and future academic, administrative, and office facilities resulting in reductions in trip generation. In addition, traffic impacts would be fully mitigated by implementation of the mitigation measures identified in Chapter 4.16 for the proposed Project. Impacts regarding traffic would be reduced in comparison to the proposed Project, although of impacts would remain significant and unavoidable even with mitigation.

Tribal Cultural Resources

As discussed in Chapter 4.17, Tribal Cultural Resources, the proposed Project would produce a less than significant impact regarding listed or eligible tribal cultural resources and lead agency defined tribal cultural resources. The Increased Student Housing Alternative would result in the same footprint of development on the Project site, albeit at a denser pattern due to the addition of new student housing on the CBU campus. Development under the Increased Student Housing Alternative could occur at any location on the CBU campus; however, impacts would be less than significant. Impacts would be the same as compared to the proposed Project.

Utilities

As discussed in Chapter 4.18, Utilities, the proposed Project would produce no impact or a less than significant impact regarding wastewater treatment requirements, construction of additional water and/or wastewater treatment facilities, construction of additional storm water drainage facilities, water supplies, wastewater treatment capacity, landfill capacity, and solid waste regulations. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and the same need for utility services would occur. Similar to the proposed Project, the demand for utility services under the Increased Student Housing Alternative would not result in the need for new or expanded utilities the construction of which would produce a significant impact on the environment. Impacts regarding utilities would be less than significant, the same as for the proposed Project.

Energy Conservation

As discussed in Chapter 4.19, Energy Conservation, the proposed Project would produce a less than significant impact regarding: consumption of energy; conflicts with energy standards and regulations; and significant demand on local and regional energy supplies. The Increased Student Housing Alternative would result in a denser development pattern on the CBU campus, and a slightly increased demand for energy would occur. Similar to the proposed Project, the demand for energy under the Increased Student Housing Alternative would not result in wasteful, inefficient, unnecessary use of energy, conflicts with energy standards and regulations, or excessive energy demand that would tax local or regional supplies. Impacts regarding energy conservation would be less than significant, the same as for the proposed Project.

Relationship to Project Objectives and Feasibility

Under the Increased Student Housing Alternative, the CBUSP Amendment would guide future development on the CBU campus. The Increased Student Housing Alternative would result in the need for more student housing, additional structured parking, and support facilities to serve the greater population within the same footprint of development on the Project site.

Meets Project Objectives

Table 7.C provides a list of the Project objectives and whether or not the alternative meets each objective.

Table 7.C
Summary of Increased Student Housing Alternative Success at Meeting Project Objectives

Project Objective and Policies	Alternative Meets Objective?
Objective 1: Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025. Policy 1.1: Pursue the development program and campus improvements described in this Specific Plan while maintaining the flexibility needed to accommodate evolving academic and student needs and dynamic growth.	**No.** The Increased Student Housing Alternative adds approximately 1,100 student beds on campus, over and above the previsions of the proposed CBUSP Amendment. This produces demand for additional structured parking and support services to house and serve additional student living on campus. Because the campus area is fixed at 167 acres, this impacts potential expansion of academic facilities to meet the objective. The Alternative fails to meet this objective more so than the propose Project.
Objective 2: Create a unified campus identity recognizable for both CBU and the community by harmonizing the campus aesthetic through architecture, signage, and landscaping. Policy 2.1: Provide edge and transition standards that respect the scale and character of the campus community interface in accordance with the development standards outlined herein. Policy 2.2: Create a new dramatic entrance to the campus at Adams Street and Briarwood Drive, connecting to Campus Bridge Drive and linking the urban mixed uses with the balance of the campus uses. Policy 2.3: Maintain the Magnolia Avenue Corridor as a major multi-use corridor and attractive boulevard along the campus frontage.	**Yes.** The Increased Student Housing Alternative implements the proposed CBUSP Amendment.
Objective 3: Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities. Policy 3.1: Establish and maintain modern educational and research facilities that respond to the needs of the University's mission and planned curriculum. Policy 3.2: Provide a variety of safe and secure housing	**No.** The Increased Student Housing Alternative fails to meet this Objective because it would impede the ability to achieve Policy 3.1 and 3.3 due to physical commitments to serve a greater student population within a fixed amount of space. It would tax the services under Policy 3.2 by placing more demand on security services.

Table 7.C
Summary of Increased Student Housing Alternative Success at Meeting Project Objectives

Project Objective and Policies	Alternative Meets Objective?
opportunities for students, including through the conversion of existing apartment units to student housing. Policy 3.3: Expand the athletic facilities to accommodate campus growth and attract higher level competitive prospective student-athletes. Policy 3.4: Operate a modern events center that serves as the centerpiece for cultural and Christian events that advance the University's mission. Policy 3.5: Complete the transformation of Adams Plaza into a revitalized Lancer Plaza that incorporates a student recreation center, support services, and academic uses.	
Objective 4: Accommodate diverse modes of mobility for students, staff, and visitors traveling to, from, and within the CBU campus. Policy 4.1: Ensure consistency with City of Riverside street standards, as may be modified, regarding ultimate roadway configuration and improvements for those public roadway segments abutting the campus. Policy 4.2: Provide well-marked and signed travelways for pedestrians, cyclists, and motorists within the CBU campus. Policy 4.3: Accommodate the University's parking demand in a manner that minimizes external impacts, as required per this Specific Plan. Policy 4.4: Pursue the vacation of Diana Avenue to provide reasonable control over the access and vehicle speed along this southern campus edge. Policy 4.5: Provide adequate and conveniently located bicycle racks throughout the campus.	**Yes in part.** The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the previsions of the proposed CBUSP Amendment. These additional beds will generate a demand for an additional 770 parking spaces that equates to at least one additional parking structure. This additional commitment of land resources would compromise the ability to achieve Objective 1.
Objective 5: Respect cultural features on the campus that reflect Riverside's history and contribute to campus historical identity, while accommodating the University's needs pursuant to its mission. Policy 5.1: Pursue the adaptive reuse of designated historical structures in accordance with local, State, and federal regulations, standards, guidelines, and Table 4-5. Policy 5.2: Provide for new buildings to be architecturally compatible with the existing historical campus architecture consistent with the design guidelines contained in this Specific Plan. Policy 5.3: Protect historical landscapes and other non-structural features pursuant to the standards in this Specific Plan.	**Yes.** The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the previsions of the proposed CBUSP Amendment.

Table 7.C
Summary of Increased Student Housing Alternative Success at Meeting Project Objectives

Project Objective and Policies	Alternative Meets Objective?
Policy 5.4: Establish a CBU historical district, in accordance with Title 20 of the Riverside Municipal Code, that encompasses buildings and other features that reflect Riverside's rich history.	
Objective 6: Encourage environmentally sustainable development and operational practices. Policy 6.1: Improve energy and lifecycle performance of building systems to achieve higher energy efficiency and reduce long-term operating expenses consistent with City of Riverside building code requirements. Policy 6.2: Reduce the University's overall water consumption consistent with local and statewide goals. Policy 6.3: Enhance waste diversion programs from construction and operations to ensure compliance with City of Riverside requirements. Policy 6.4: Implement sustainability measures that complement and support the *City of Riverside Green Action Plan*.	**Yes.** The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the previsions of the proposed CBUSP Amendment. The 1,100 additional on campus residents will require water and produce waste in the same manner whether on- or off-campus. Building energy and lifecycle improvements would be the same as the proposed Project.
Objective 7: Enhance the positive image and relationship of CBU with the City of Riverside, while highlighting the significance of the campus to the community. Policy 7.1: Provide opportunities for University/City partnerships for programming of events on campus. Policy 7.2: Maintain an open-door policy for the community to experience cultural events, competitive sports, conferencing, and other events on campus.	**Yes.** The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the previsions of the proposed CBUSP Amendment.
Objective 8: Provide technologies that allow the University to offer state-of-the-art instruction and research. Policy 8.1: Strive towards seamless access to information, resources, and services by creating and maintaining a vanguard converged network infrastructure supporting voice, video, and data. Policy 8.2: Enhance student and faculty access by providing campus-wide wireless coverage. Policy 8.3: Enrich student experience by leveraging technologies to improve operational efficiencies. Policy 8.4: Stay abreast of emerging technologies by participating and partnering with relevant organizations in this ever-changing landscape.	**No.** The Increased Student Housing Alternative implements the proposed CBUSP Amendment plus adds approximately 1,100 student beds on campus, over and above the previsions of the proposed CBUSP Amendment. This additional commitment of land resources would compromise the ability to achieve Objective 8.

The Increased Student Alternative would reduce the severity of impacts related to air quality, greenhouse gas emissions, and traffic. However, impacts for air quality and greenhouse gas would remain less than significant and traffic significant in the same manner as the Proposed

Project. The Increased Student Housing Alternative would meet five of eight Project objectives, with Objectives 1, 3, and 8 not met. Objective 1 is the single most important Project objective. Objective 1 is to: *Provide sufficient and appropriate academic, research, athletic, housing, and support facilities to accommodate the University's planned student enrollment of 12,000 by year 2025.* Objective 3 is to: *Provide an enhanced CBU campus setting that attracts prospective students and their parents to the City of Riverside, and that enhances the stature of CBU as it relates to other universities and facilities;* and Objective 8 is to: *Provide technologies that allow the University to offer state-of-the-art instruction and research.* Because the Increased Student Housing Alternative does not meet the single most important objective (Objective 1), would not enhance CBU's attraction and stature to prospective students and other universities and facilities (Objective 3), and would not provide technologies to offer state-of-the-art instruction and research (Objective 8), this alternative has been eliminated from further consideration and is determined to be not feasible.

7.6 COMPARISON OF PROJECT ALTERNATIVES

The following discussion compares the impacts of each alternative with the impacts of the proposed Project. Table 7.D compares the impacts of the alternatives with those of the proposed Project and identifies whether the alternative results in (1) a reduction of the impact; (2) a greater impact than the project; or (3) the same impact as the project. It should be noted that the No Project Alternative has no impacts compared to the proposed project and represents existing conditions on the site. Additionally, any alternative impacts not included in Table 7.D are considered to have the same level of less than significance as the proposed project.

Table 7.D
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
Aesthetics	Scenic Vistas	LTS	=	=
	Scenic Highways	LTS	=	=
	Visual Character	LTS	=	=
	Light and Glare	LTS	=	=
	Cumulative	LTS	=	=
Agricultural and Forestry Resources	Conversion of Prime, Unique, or Statewide Important Farmland to Non-Agricultural Use	NI	=	=
	Conflict with Agricultural Zoning or Williamson Act	NI	=	=
	Conflict with Existing Forest Land Zoning or Cause Rezoning of Forest Land	NI	=	=

Table 7.D
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
	Conversion of Forest Land to Non-Forest Use	NI	=	=
	Other Changes that would Convert Farmland or Forest Land	NI	=	=
	Cumulative	NI	=	=
Air Quality	Conflict with or Obstruct an Air Quality Plan	LTS	=	=
	Violate an Air Quality Standard	LTS	= -	= -
	Result in Cumulatively Considerable Net Increase in any Criteria Pollutant	LTS	= -	= -
	Expose Sensitive Receptors to Substantial Pollutant Concentrations	LTS	= -	= -
	Create Objectionable Odors	LTS	=	=
	Cumulative	LTS	= -	= -
Biological Resources	Candidate, Non-listed Sensitive, or Special-Status Species	LTS (MM)	=	=
	Riparian Habitat or Other Sensitive Natural Communities	LTS	=	=
	Jurisdictional Waters/Wetlands	LTS	=	=
	Wildlife Movement and Migratory Species	LTS	=	=
	Adopted Policies and/or Ordinances	LTS (MM)	=	=
	Adopted habitat Conservation Plans	LTS	=	=
	Cumulative	LTS (MM)	=	=
Cultural Resources	Historic Resources	LTS	=	=
	Archaeological Resources	LTS (MM)	=	=
	Paleontological Resources	LTS	=	=
	Human Remains	LTS	=	=
	Cumulative	LTS (MM)	=	=
Geology and Soils	Fault Rupture	LTS	=	=
	Ground Shaking	LTS	=	=
	Seismic-Related Ground Failure	LTS (MM)	=	=
	Landslides and Rockfalls	LTS	=	=
	Soil Erosion or Loss of Topsoil	LTS	=	=
	Unstable Soils	LTS (MM)	=	=
	Expansive Soils	LTS (MM)	=	=
	Septic Tanks	NI	=	=
	Cumulative	LTS (MM)	=	=
Greenhouse	Greenhouse Gas Emissions	LTS	= -	= -

Table 7.D
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
Gas Emissions	Conflict with Applicable Plan Policy, or Regulation	LTS (MM)	= -	= -
	Cumulative	LTS (MM)	= -	= -
Hazards and Hazardous Materials	Routine Transport, use, or Disposal of Hazardous Materials	LTS	=	=
	Reasonably Foreseeable Upset and Accident Conditions	LTS (MM)	=	=
	Emit Hazards Near Existing or Proposed School	LTS	=	=
	Located on a Listed Hazardous Materials Site	LTS (MM)	=	=
	Within an Airport Land Use Plan or Within Two Miles of a Public Airport	LTS (MM)	=	=
	Within Vicinity of a Private Airport	NI	=	=
	Conflict with Emergency Response Plans	LTS	=	=
	Wildland Fire Risks	NI	=	=
	Cumulative	LTS (MM)	=	=
Hydrology and Water Quality	Water Quality Standards or Waste Discharge Requirements	LTS	=	=
	Groundwater	LTS	=	=
	Alter Drainage Resulting in Erosion or Siltation Offsite	LTS	=	=
	Alter Drainage or Increase of Surface Runoff Resulting in Flooding On- or Off-site	LTS	=	=
	Runoff Exceeding Capacity of Existing or Planned Facilities	LTS	=	=
	Otherwise Degrade Water Quality	LTS	=	=
	Place Housing in Flood Hazard Areas	NI	=	=
	Place Structures that Impede or Redirect Flood Flows	NI	=	=
	Dam Inundation Impacts	LTS	=	=
	Inundation by Seiche, Tsunami, or Mudflow	LTS	=	=
	Cumulative	LTS	=	=
Land Use and Planning	Physically Divide an Established Community	LTS	=	=
	Conflict with Applicable Land Use Plans, Policies, or Regulations	LTS	=	=
	Conflict with Any Applicable Habitat or Natural Community Conservation Plan	LTS	=	=
	Cumulative	LTS	=	=

Table 7.D
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
Mineral Resources	Loss of Statewide or Regional Important Mineral Resources	NI	=	=
	Loss of Locally Important Mineral Resources	NI	=	=
	Cumulative	NI	=	=
Noise	Exposure of Persons or Generation of Noise in Excess of Standards Established by the General Plan or Noise Ordinance	LTS (MM)	=	=
	Groundborne Vibration	LTS (MM)	=	=
	Substantial Permanent Increase in Ambient Noise	LTS (MM)	=	=
	Substantial Temporary or Periodic Increase in Ambient Noise	LTS (MM)	=	=
	Exposure to Excessive Noise from Public Airport	LTS	=	=
	Exposure to Excessive Noise from Private Airport	LTS	=	=
	Cumulative	LTS (MM)	=	=
Population and Housing	Population Growth	LTS	=	=
	Displace Housing	LTS	=	=
	Displace People	LTS	=	=
	Cumulative	LTS	=	=
Public Services	Police Protection Facilities	LTS	=	=
	Fire Protection Facilities	LTS	=	=
	School Facilities	NI	=	=
	Library Facilities	LTS	=	=
	Other Facilities	LTS	=	=
	Cumulative	LTS	=	=
Recreation	Existing Recreational and Park Facilities	LTS	=	=
	New or Physically Altered Recreation and Park Facilities	LTS	=	=
	Cumulative	LTS	=	=
Transportation and Traffic	Conflict with Applicable Plan, Ordinance, or Policy Establishing Measures of Effectiveness for the Performance of the Circulation System	SIG (MM)	←SIG	←SIG
	Conflict with Applicable Congestion Management Program	SIG (MM)	←SIG	←SIG)
	Air Traffic Patterns	LTS	=	=
	Design Features or incompatible Uses	LTS	=	=

Table 7.D
Impact Comparison of Project Alternatives

Environmental Factor		Proposed Project	No Project Alternative	Increased Student Housing Alternative
	Inadequate Emergency Access	LTS	=	=
	Public Transit, Bicycle, or Pedestrian Facilities	LTS	=	=
	Cumulative	SIG (MM)	←SIG	←SIG
Tribal Cultural Resources	Listed or Eligible Tribal Cultural Resources	LTS	=	=
	Lead Agency Defined Tribal Cultural Resources	LTS	=	=
	Cumulative	LTS	=	=
Utilities and Service Systems	Wastewater Treatment Requirements	LTS	=	=
	Require Construction of Additional Water and/or Wastewater Treatment Facilities	LTS	=	=
	Require Construction of Additional Storm Water Drainage Facilities	LTS	=	=
	Sufficient Water Supplies	LTS	=	=
	Wastewater Treatment Capacity	LTS	=	=
	Sufficient Landfill Capacity	LTS	=	=
	Solid Waste Regulations	LTS	=	=
	Cumulative	LTS	=	=
Energy Conservation	Wasteful, Inefficient, or Unnecessary Consumption of Energy	LTS	=	=
	Conflict Energy Standards and Regulations	LTS	=	=
	Significant Demand on Local and Regional Energy Supplies	LTS	=	=
	Cumulative	LTS	=	=

Impact Abbreviations
NI: No Impact
LTS: Less than Significant Impact
LTS (MM): Less than Significant Impact with Mitigation
SIG (MM): Significant Impact with Mitigation

Project Alternatives
= Compared with the proposed Project, no change in the quantity of impact or significance of the impact.
= - Compared with the proposed Project, the volume or extent of the impact is reduced but the significance remains the same.
= + Compared with the proposed Project, the volume or extent of the impact is reduced but the significance remains the same.
→ Compared with the proposed Project, the significance of the impact is increased.
← Compared with the proposed Project, the significance of the impact is reduced.
←SIG Compared with the proposed Project, the volume or extent of the impact is reduced, yet still significant.
→SIG Compared with the proposed Project, the volume or extent of the impact is increased and still significant.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

The *CEQA Guidelines* provide that when an alternatives analysis is prepared consistent with C*EQA Guidelines Section 15126.6 (e[2]),* an environmentally superior alternative must be identified in the EIR. The proposed Project would have significant and unavoidable impacts related to traffic. All other project-related impacts were either identified as less than significant or were mitigated to a less than significant level with the incorporation of mitigation.

The Environmentally Superior Alternative is the one that would result in the fewest or least significant impacts. The No Project Alternative would eliminate the single significant and unavoidable impact produced by the proposed Project (i.e., significant and unavoidable traffic impacts). If the Environmentally Superior Alternative is the No Project Alternative, as in this case, then an Environmentally Superior Alternative must be selected from the remaining alternatives. Given there is only one additional alternative considered after the No Project Alternative, the Increased Student Housing Alternative is considered to be the Environmentally Superior Alternative. The Increased Student Housing Alternative would reduce the volume or extent of the air quality, greenhouse gas, and traffic impacts, although the significance of the impacts would remain the same as the proposed Project and the significant and unavoidable traffic impact would remain.

As mentioned previously, the increase of 1,100 student beds would generate demand for 770 additional parking spaces based on 0.7 spaces per student (1,100 × 0.7 = 770), which would require at least one additional parking structure. The increase of 1,100 beds would require additional provisions for residential space, food service, security, and health care. Although the 1100 beds would occur above and beyond the provision of 400,000 square feet of additional building area, the campus area is fixed at 167 acres. Moreover, existing restrictions imposed by the Airport Land Use Commission limit building heights to 100 feet or lower, serving to limit the vertical extent that development may be allowed. This Alternative would create tension between the ability to provide space for academic development consistent with Project Objective 1 and the burden of providing space for the additional facilities to support the increased student housing.

For these reasons, this alternative would fail to meet all of the Project's objectives. The Increased Student Alternative has been rejected because it would fail to meet the most important objective, Objective 1, as well as failing to meet Objective 3, and Objective 8.

CHAPTER 8.0
GROWTH-INDUCING IMPACTS

8.1 ENVIRONMENTAL IMPACTS

Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines requires a discussion of how the potential growth-inducing impacts of the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Induced growth is distinguished from the direct employment, population, or housing growth of a project (14 CCR 15000 et seq.). If a project has characteristics that "may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively," then these aspects of the project must be discussed as well. Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place in the absence of the proposed project. Typically, the growth-inducing potential of a project would be considered significant if it stimulates population growth or a population concentration above what is assumed in local and regional land use plans, or in projections made by regional planning authorities, such as the Southern California Association of Governments (SCAG).

The CEQA Guidelines also indicate that growth should not be assumed to be either beneficial or detrimental (14 CCR 15126.2(d)). According to Section 15126.2(d) of the CEQA Guidelines, a project may foster economic or population growth, or additional housing, either indirectly or directly, in a geographical area if it meets any one of the following criteria:

- The project would remove obstacles to population growth.
- Increases in the population may tax existing community service facilities, causing significant environmental effects.
- The project would encourage and facilitate other activities that could significantly affect the environment.

The CBU Specific Plan Amendment (Project) would involve the expansion of CBU facilities on an approximately 167-acre site over a 10-year period, as proposed in the CBU Specific Plan (CBUSP). The Project proposes to add approximately 400,000 square feet of building space for administrative, academic, student housing, and recreational purposes.

Based on a student to faculty/staff ratio of 11.11, the projected increase in students from 8,414 in 2015 to 12,000 by 2025 would yield an increase in faculty/staff from 757 in 2015 to 1,080 by 2025. Therefore, the proposed Project would generate approximately 323 additional jobs in the City at CBU. Of the 12,000 projected students in 2025, 7,201 are considered traditional students,

meaning full-time undergraduates who either live on campus or commute. Since every traditional student must live on campus until the age of 21 as a matter of CBU policy, and CBU's goal is to provide a bed-to-student ratio of 0.55 for traditional students. Implementation of the CBUSP Amendment could generate up to 326 additional student housing units by 2025.

The Project would not involve the development of additional traditional housing but does include additional housing for CBU students. The proposal to expanded CBU facilities by 400,000 square feet is to meet the growth demand anticipated at the university in the next 10 years. Meeting demands for educational services would not be growth inducing. This Project promotes infill development rather than encouraging new development within a currently undeveloped area. However, the Project would require additional employees to serve the expanded student population (323 new faculty members and potentially additional maintenance and administrative staff). Overall, the Project would indirectly stimulate population growth through the addition of new faculty members. However, the growth would be consistent with employment growth envisioned in local and regional land use plans and in projections made by regional planning authorities, since the planned growth of CBU and its land use intensity have been factored into the underlying growth projections of the SCAG 2015–2040 Regional Transportation Plan/Sustainable Communities Strategy.

According to SCAG's Growth Forecast (an appendix to the 2015-2040 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS)), the population of the City is anticipated to grow from 310,700 in 2012 to 386,600 in 2040 (SCAG 2016). Project increase in student population of 3,586 (all of which will not be living on campus or within the City of Riverside) will result in less than 0.9 percent of the total population in SCAG's projected growth in 2040 (Project population of 3,586 divided by SCAG's anticipated population of 386,000 in 2040). Therefore, the anticipated student population growth on the Project site will be considered a nominal increase contribution compared to the SCAG's Growth Forecast for the City in 2040.

According to SCAG's Growth Forecast, employment is anticipated to grow from 120,000 in 2012 to 200,500 in 2040 in the City (SCAG 2016). The Project is expected to create approximately 323 jobs at project build-out. Project generation of approximately 323 jobs will result in approximately 0.2 percent of the total employment in SCAG's Growth Forecast in 2040 (Project job generation of 323 divided by SCAG's forecast employment of 200,500 in 2040). Therefore, the increase in employment will be minimal in comparison to the anticipated increase of the SCAG Growth Forecast.

Indirect growth can also occur by a project installing infrastructure that can support further growth. The Project site is served by existing public services and utilities, and no new utilities

will be needed in order to serve the Project. Therefore, indirect growth inducement as a result of the extension of these facilities into a new area will not occur.

Overall, the Project will directly stimulate population growth through the addition of educational facilities. However, it is anticipated that not all the students will live on campus or in the immediate vicinity of CBU. It is also anticipated the additional faculty could live in the City or in surrounding communities. The Project will indirectly stimulate population growth through the addition of new jobs on the Project site.

Because of the reasons stated above, the Project would not result in substantial growth inducement. Growth inducement impacts are therefore considered to be less than significant and no mitigation is required.

8.2 REFERENCES

City of Riverside. 2007a. City of Riverside General Plan 2025. Adopted November 2007. Accessed December 19, 2017. http://riversideca.gov/planning/gp2025program/00_Executive_Summary.pdf.

SCAG (Southern California Association of Governments). 2016. "Growth Forecast." Appendix to the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy. Adopted April 7, 2016. Accessed December 19, 2017 http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

California Baptist University Specific Plan Amendment, Public Review Draft. Table 4-2. City of Riverside. August 2018.

THIS PAGE INTENTIONALLY LEFT BLANK