

APPENDIX A: NOP, DISTRIBUTION LIST, NOP RESPONSE LETTERS

THIS PAGE INTENTIONALLY LEFT BLANK



Community & Economic Development Department

Planning Division

3900 Main Street, Riverside, CA 92522 | Phone: (951) 826-5371 | RiversideCA.gov

NOTICE OF PREPARATION

TO: See attached list

FROM LEAD AGENCY:

Patricia Brenes, Principal Planner
City of Riverside
Community and Economic
Development Department
Planning Division
3900 Main Street, 3rd floor
Riverside, California 92522

DATE: April 28, 2016

SUBJECT: Notice of Preparation of a Draft Environmental Impact Report (EIR) for California Baptist University Specific Plan Amendment No. 1.

The City of Riverside will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the proposed California Baptist University Specific Plan Amendment No. 1 (Project). The University is located at 8432 Magnolia Avenue in Riverside, California. The City needs to know the views of you or your agency or organization as to the scope and content of the environmental information that is germane to your agency or organization's statutory responsibilities or interests in connection with the proposed Project. If applicable, an agency will need to use the EIR prepared by our Agency when considering your permit or other approval for the Project.

This Notice of Preparation (NOP) identifies the Project applicant, contains the proposed Project description and Project setting/location, and identifies the potential environmental effects of the proposed Project. A project vicinity map and California Baptist University Specific Plan (CBUSP) Planning Area Map are also included in this NOP.

Due to time limits mandated by State law, your response must be received at the earliest possible date, **but not later than 30 days** after receipt of this NOP.

Please send your NOP response or responses to Patricia Brenes at the address shown above. We will need the name and contact person in your agency. If you have any questions, please contact Patricia Brenes at 951-826-2307 or via e-mail at pbrenes@riversideca.gov.

PROJECT TITLE: California Baptist University Specific Plan Amendment No. 1 - Planning Cases P15-0988 (Specific Plan Amendment), P15-0989 (General Plan Amendment), P15-0987 (Change of Zone), and P15-0990 (Environmental Impact Report).

PROJECT APPLICANT: Steve Smith, California Baptist University (CBU)

PROJECT SETTING: The CBU campus is located at 8432 Magnolia Avenue in the City of Riverside, California, within the Ramona Neighborhood and along State Route (SR-91). The Campus Core is defined as the properties bounded by Diana Avenue, Magnolia Avenue, Monroe Street, and Adams Street (Figure 1 – California Baptist University Campus Vicinity and Figure 2 – California Baptist University Aerial View). The land uses surrounding the campus consist of a mixture of single-family and multi-family residential, an office complex, retail and commercial uses, public, private, charter elementary, middle, and high schools, medical facilities, a park, and several churches.

PROJECT DESCRIPTION: The proposed Project is an amendment to the California Baptist University Specific Plan (CBUSP). CBU encompasses approximately 163 acres developed with academic, residential, recreational, open space, parking and industrial uses (Figures 1 and 2). Land uses surrounding the subject area include single-family homes, apartments, offices, schools, open space, and religious institutions. The University is comprised of the Campus Core and Transition Areas (Figure 3 - California Baptist University Specific Plan Boundary, Campus Core Area, and Transition Area). The Transition Area is defined as the properties outside of the Campus Core Area.

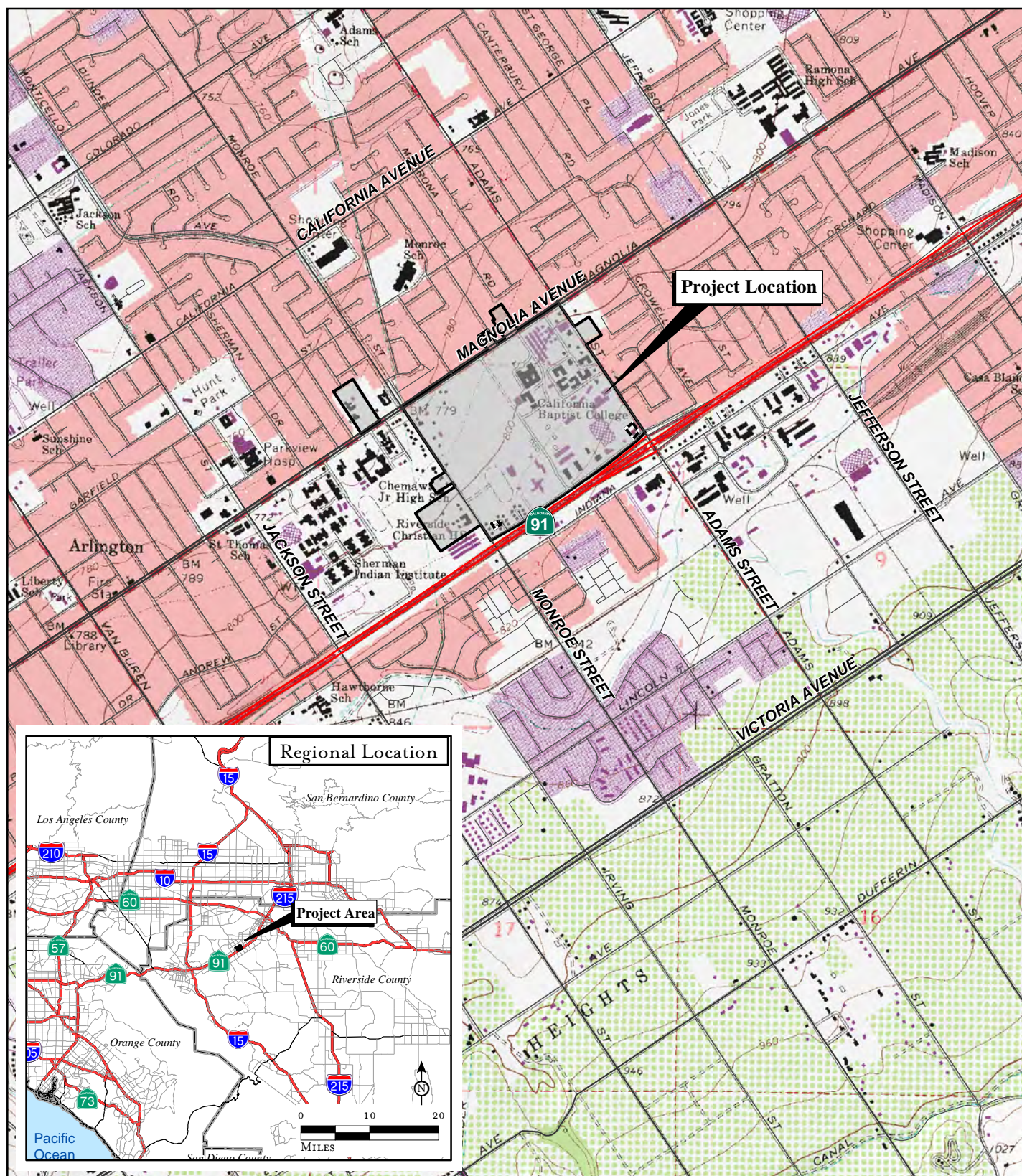


FIGURE 1

*California Baptist University
Specific Plan Amendment Project*

Regional and Project Location


LSA



0 1,000 2,000

Feet

LEGEND

 Specific Plan Area

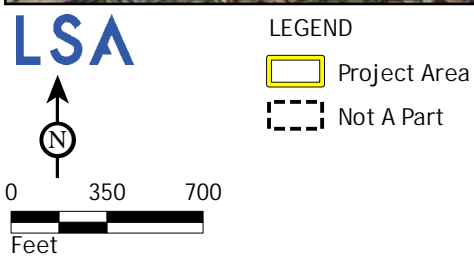
☐ Not A Part

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

I:\CTR1501\Reports\EIR\fig1_RegLoc.mxd (3/11/2016)



FIGURE 2



*California Baptist University
Specific Plan Amendment Project*

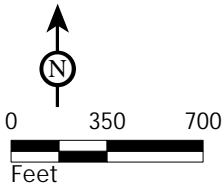
Aerial View of Project Area

SOURCE: Bing Aerial, 2016.

I:\CTR1501\Reports\EIR\fig2_AerialView.mxd (3/11/2016)



LSA



LEGEND





- | | |
|--|--|
|  Project Area |  Campus Core Area |
|  Not A Part |  Transition Area |

FIGURE 3

*California Baptist University
Specific Plan Amendment Project
Specific Plan Campus Core
and Transition Areas*

SOURCE: Bing Aerial, 2016.

I:\CTR1501\Reports\EIR\fig3_CampusCore_TransitionAreas.mxd (3/11/2016)

The campus has continued to grow, both in area and student population, since the adoption of the CBUSP in 2013. A 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. The growth in student population is due to the expansion of the curriculum offered. The University's student population consists of four student categories: traditional students, graduate students, online students, and intensive English students.

Table 1 outlines the projected student enrollment growth over the next 10 years.

Table 1

STUDENT POPULATION PROJECTIONS					
Year	Traditional	Graduate	Online	Intensive English	Total Enrollment
2015	5201	1268	1921	24	8414
2020	6201	1543	2421	44	10,209
2025	7201	1813	2921	65	12,000

To achieve the University's goal of 12,000 enrolled students by the year 2025, new and reconfigured educational, housing, administrative support, athletic, and other facilities will be required within the main campus area. Support and ancillary facilities may also be established on University-owned properties not contiguous to the main campus (i.e., Transition Areas). To accommodate the reconfigured educational fields and future academic purposes, CBU anticipates providing an additional 146,000 square feet of building area to the already existing 610,750 square feet of building area.

Future development within the CBUSP Planning Area will take into consideration the relationship and compatibility of the CBU campus with its surroundings. A single zoning district—the CBU Campus Zone - is proposed for the main campus to regulate land uses. Two subareas are defined—Campus Core and Transition Area—to regulate building height, density, and buffers from the edge of the main campus. The Campus Core and Campus Transition subareas permit the same land uses, but have different height and density requirements. Figure 3 illustrates the proposed Campus Core and Transition Areas.

Potential Environmental Issues of Concern: The EIR will address all environmental topics. For the proposed project, key environmental issues of concern are anticipated to include potentially significant impacts to air quality, cultural resources, greenhouse gas emissions, hazards and hazardous materials, noise, and transportation/traffic. In summary, the analysis in the EIR will include the following specific categories of environmental impacts and concerns related to the proposed Project:

Aesthetics: The EIR will address the potential effects on scenic vistas, scenic corridors, visual character, and light and glare.

Agriculture and Forestry Resources: The EIR will address the potential effects on farmland, forest land and timberland and the loss of land zoned for agricultural use.

Air Quality: The EIR will describe existing air quality conditions and will evaluate the potential air quality impacts of the CBUSP Amendment consistent with Southern California Air Quality Management District methodology. The EIR will discuss the measures included in the CBUSP Amendment to minimize impacts of criteria air pollutant emissions.

Biological Resources: The EIR will describe the existing biological conditions within the project Planning Area, and potential impacts of the CBUSP Amendment on vegetation and wildlife, including special status species. The EIR will evaluate the likelihood of any

significant impacts, including consistency with the Western Riverside County Multiple Species Habitat Conservation Plan.

Cultural Resources: The EIR will address potential impacts to historic structures, archaeological, and paleontological resources.

Geology and Soils: The EIR will assess soil and geologic conditions in the project Planning Area and address seismic hazards, including the potential for liquefaction, ground-shaking, and soil erosion.

Greenhouse Gas Emissions: The EIR will examine the potential impacts of implementing the CBUSP Amendment relative to greenhouse gas (GHG) emissions and global climate change. The EIR will discuss the measures included in the CBUSP Amendment to minimize impacts of GHG emissions.

Hazards and Hazardous Materials: The EIR will include a description of the potential hazards in the project Planning Area and the health and safety effects based on implementation of the CBUSP Amendment.

Hydrology/ Water Quality: The EIR will discuss the drainage conditions throughout the project Planning Area and the potential for flooding. Water quality impacts and conformance with the Santa Ana Regional Water Quality Control Board requirements will be addressed.

Land Use and Planning: The EIR will identify the land uses in the project Planning Area and evaluate potential land use constraints created by existing conditions. The compatibility of the CBUSP Amendment with existing and proposed land uses in the project Planning Area and consistency with the City policies and plans will be evaluated.

Mineral Resources: The EIR will discuss impacts to mineral resources from implementation of the CBUSP Amendment.

Noise: The EIR will discuss noise impacts from implementation of the CBUSP Amendment, including impacts from area noise sources (e.g., railroads, airports, and SR-91 freeway, etc.). A noise analysis will identify existing settings and noise level scenarios associated with implementation of the CBUSP Amendment. The EIR will address potential noise impacts associated with implementation of the CBUSP Amendment on residential and other sensitive receptor land uses. Conformance to the City's noise guidelines will be analyzed.

Population and Housing: The EIR will evaluate the potential for the proposed land uses of the CBUSP Amendment to result in population or housing growth, and will also discuss the potential displacement of housing and people as development occurs.

Public Services: The EIR will identify existing police, fire, schools, parks, and other public services and facilities serving the City, and will quantify the increase in service demands resulting from implementation of the CBUSP Amendment. The availability and adequacy of existing services will be generally analyzed.

Recreation: The EIR will discuss the potential to result in the increase in the use of existing recreational facilities that may result in an accelerated physical deterioration of such facilities.

Traffic and Circulation: The traffic analysis prepared for the CBUSP Amendment and EIR will describe the existing roadway conditions, circulation patterns, and other elements of the transportation system in the project Planning Area, including the local streets and intersections and regional facilities (e.g., SR-91 freeway). A transportation modeling analysis will be prepared in order to evaluate full build-out of the CBUSP Amendment on the overall transportation network. The CBUSP Amendment's compliance with adopted policies, plans, and programs supporting alternative modes of transportation will also be discussed.

Utilities and Service Systems: The EIR will discuss the ability of existing infrastructure in the City, such as sanitary sewer, storm drains, water supply, and solid waste, to serve full buildout of the CBUSP Amendment. The EIR will also discuss the availability of the existing water supply to provide for full buildout of the CBUSP Amendment.

Project Alternatives: Identification of potential alternatives to the CBUSP Amendment will be addressed. Analysis of a "No Project" alternative is required by law. Up to three alternatives, in addition to the "No Project-No Build" Alternative, will be evaluated. The evaluation of alternatives will provide a comparative analysis of alternatives to the proposed CBUSP Amendment.

The EIR will identify the degree to which each alternative might reduce one or more of the impacts associated with implementation of the CBUSP Amendment, whether or not the alternative could result in other or increased impacts, the viability of the alternative, and the degree to which the alternative is consistent with the City's goals and objectives.

Cumulative Impact Analysis: The EIR will include a discussion of the potentially significant cumulative impacts of the CBUSP Amendment when considered with other past, present, and reasonably foreseeable future projects in the area.

Other Required Sections: The EIR will also include other information typically required for an EIR. These other sections include the following: 1) Introduction; 2) Project Description; 3) Effects Found Not to Be Significant; 4) Environmental Impact Analysis; Growth-Inducing Impacts; 5) Significant Unavoidable Environmental Effects; 6) Significant Irreversible Changes; 7) Consistency with Regional Plans; 8) Discussion and Analysis of Energy Conservation based on Appendix F of CEQA Guidelines; 9) Mitigation Measures; 10) References; and 11) List of Preparers.

Relevant technical reports will be provided as EIR appendices.

SIGNATURE: 

TITLE: Patricia Brenes, Principal Planner- City of Riverside

TELEPHONE: 951-826-2307

DATE: 4/28/16

Attachments:

1. Notice of Preparation Distribution List

Chris Christopolous, Building Division
City of Riverside, CEDD
3900 Main Street, 3rd Floor
Riverside, CA 92522

Margaret Albanese Attn: Fire Prevention
Lisa Munoz
City of Riverside, Fire Department
3900 Main Street, 3rd Floor
Riverside, CA 92522

Jeff Hart
City of Riverside, Public Works
3900 Main Street, 4th Floor
Riverside, CA 92522

Matt Bates, Water Engineer
City of Riverside, Public Utilities
Mission Square Building
3750 University Avenue, 4th Flr
Riverside, CA 92501

Summer Ayala, Electric Eng., Sys. Planning
City of Riverside, Public Utilities
Mission Square Building
3750 University Avenue, 4th Flr
Riverside, CA 92501

Toni Redman
City of Riverside, Public Utilities
Mission Square Building
3750 University Avenue, 4th Flr
Riverside, CA 92501

Randy McDaniel, Project Manager
City of Riverside, Park and Recreation
6927 Magnolia Avenue, 2nd Floor
Riverside, CA 92506

Archie Washington
Public Works – Solid Waste
awashington@riversideca.gov

AT&T California
Susan Blackburn, AT&T Substructure Desk
1265 Van Buren Blvd., Rm 180
Anaheim, CA 92807

AT&T
SAG (Street Address Guide)
4331 Communications Dr., Rm 2-W-074
Dallas, TX 75211

Ken Mueller
Director of Maintenance & Operations
Riverside Unified School Dist
3070 Washington Street
Riverside, CA 92504

Riverside Unified School District
Director of Planning
3070 Washington Street
Riverside, CA 92504

Scott Walter Wheaton, Project Manager
The Gas Company
4495 Howard Avenue
Riverside, CA 92507

Nathan Freeman,
City of Riverside, Redevelopment Division
3900 Main Street, 5th Floor
Riverside, CA 92522

Kim Ellis, Riverside Airport Manager
kellis@riversideca.gov

John Guerin
County of Riverside ALUC
4080 Lemon Street, 14th Floor
Riverside, CA 92501

Cindy Roth
Greater Riverside Chambers of Commerce
3985 University Avenue
Riverside, CA 92501

Michael Johnston, Business Dev. Coordinator
Greater Riverside Chambers of Commerce
3985 University Avenue
Riverside, CA 92501

Ray Hicks, Region Manager
Local Public Affairs
Southern California Edison
26100 Menifee Rd
Menifee, CA 92585

Ray Hicks, Region Manager
Local Public Affairs
Southern California Edison
26100 Menifee Rd
Menifee, CA 92585

Chris Cannon, Director of Environmental Mgmt
City of Los Angeles Harbor Department
P.O. Box 151
425 S. Palos Verdes Street
San Pedro, CA 90731-0151

Southern California Edison Company
Karen Cadavona
Third Party Environmental Review
2244 Walnut Grove Avenue
Rosemead, CA 91770
Karen.cadavona@sce.com

[Western Riverside County Regional](#)
Conservation Authority (RCA)
3403 10th Street, Ste. 320
P.O. Box 1667
Riverside, CA 92502-1667

Department of Toxic Substances Control
Rafiq Ahmed
5796 Corporate Avenue
Cypress, CA 90630

CALTRANS, District 8
Dan Kopulsky
464 W. 4th Street, MS-722, 16th floor
San Bernardino, CA 92401

Philip Crimmins,
Department of Transportation (Caltrans)
Division of Aeronautics
1120 N. Street, Room 3300
Sacramento, CA 94274-0001

CDOT - District 8 IGR/CEQA Review
Planning and Local Assistance
464 West 4th Street, 6th Floor, MS 722
San Bernardino, CA 92401-1400

Tom Franklin,
Riverside Transit Agency
1825 Third Street
Riverside, CA 92507-3416

Duane Pratt, President
Auto Center Association
8000 Auto Drive
Riverside, CA 92504

California Baptist University
8432 Magnolia Avenue
Riverside, CA 92504

Jillian Wong, Program Supervisor – CEQA IGR
South Coast Air Quality
Management District
21865 Copley Drive
Diamond Bar, CA 91765

Water Quality Control Board/
Glenn Robertson
Santa Ana Region (8)
3737 Main St., #500
Riverside, CA 92501-3348

Right of Way & Land Prog.
Metropolitan Water Dist
Po Box 54153
Los Angeles, CA 90054

Franklin A. Dancy, Director of Planning
Morongo Band of Mission Indians
12700 Pumarra Rd.
Banning, CA 92220

Attn: Joseph Ontiveros, Cultural Resources
Manager
Soboba Band of Luiseno Indians
P.O. Box 487
San Jacinto, CA 92581

Pechanga Cultural Resources Department
Anna Hoover, Cultural Analyst
P.O. Box 2183
Temecula, CA 92593

Ms. Rebecca De Leon
Environmental Planning Team
The Metropolitan Water District of So. CA
700 N. Alameda Street, US3-230
Los Angeles, CA 90012

Regional Planning Programs Section
Water Quality Control
3737 Main St, #500
Riverside, CA 92501

Governor's Office of Planning & Research
1400 Tenth Street, P.O. Box 3044
Sacramento, CA 95812-3044

California Native American Heritage
Commission
Katy Sanchez
1550 Harbor Blvd., #100
West Sacramento, CA 95691



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

Notice of Preparation

May 2, 2016

To: Reviewing Agencies

Re: California Baptist University Specific Plan Amendment No. 1 - Planning Cases P15-0988 (Specific Plan Amendment), P15-0989 (General Plan Amendment), P15-0987
SCH# 2016051004

Attached for your review and comment is the Notice of Preparation (NOP) for the California Baptist University Specific Plan Amendment No. 1 - Planning Cases P15-0988 (Specific Plan Amendment), P15-0989 (General Plan Amendment), P15-0987 draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Patricia Brenes
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2016051004
Project Title California Baptist University Specific Plan Amendment No. 1 - Planning Cases P15-0988 (Specific Plan Amendment), P15-0989 (General Plan Amendment), P15-0987
Lead Agency Riverside, City of

Type NOP Notice of Preparation

Description The proposed project is an amendment to the California Baptist University Specific Plan (CBUSP). CBU encompasses approximately 163 acres developed with academic, residential, recreational, open space, parking and industrial uses (Figure 1 and 2). Land uses surrounding the subject area include single-family homes, apartments, offices, schools, open space, and religious institutions. The University is comprised of the Campus Core and Transition Areas (Figure 3 - California Baptist University Specific Plan Boundary, Campus Core Area, and Transition Area). The Transition Area is defined as the properties outside of the Campus Core Area.

Lead Agency Contact

Name	Patricia Brenes	
Agency	City of Riverside	
Phone	(951) 826-2307	Fax
email	pbrenes@riversideca.gov	
Address	3900 Main Street, 3rd Floor	
City	Riverside	State CA Zip 92522

Project Location

County	Riverside
City	Riverside
Region	
Cross Streets	Diana Ave, Magnolia Ave, Monroe St, and Adams St
Lat / Long	
Parcel No.	
Township	Range Section Base

Proximity to:

Highways	SR-91
Airports	
Railways	
Waterways	
Schools	
Land Use	

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Biological Resources; Geologic/Seismic; Other Issues; Water Quality; Noise; Minerals; Population/Housing Balance; Public Services; Recreation/Parks; Traffic/Circulation; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 6; Office of Emergency Services, California; Native American Heritage Commission; Caltrans, District 8; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 8

Date Received	05/02/2016	Start of Review	05/02/2016	End of Review	05/31/2016
----------------------	------------	------------------------	------------	----------------------	------------

NOP Distribution List

County: DIERSIDE

SCH#

2016051004

Resources Agency

- ☒ Resources Agency
Nadell Gayou
- ☒ Dept. of Boating & Waterways
Denise Peterson
- ☒ California Coastal Commission
Elizabeth A. Fuchs
- ☒ Colorado River Board
Lisa Johansen
- ☒ Dept. of Conservation
Elizabeth Carpenter
- ☒ California Energy Commission
Eric Knight
- ☒ Cal Fire
Dan Foster
- ☒ Central Valley Flood Protection Board
James Harola
- ☒ Office of Historic Preservation
Ron Parsons
- ☒ Dept. of Parks & Recreation
Environmental Stewardship Section
- ☒ California Department of Resources, Recycling & Recovery
Sue O'Leary
- ☒ S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- ☒ Dept. of Water Resources
Nadell Gayou
- ☒ Fish and Game
Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division
- ☒ Fish & Wildlife Region 1
Curt Babcock
- ☐ Fish & Wildlife Region 1E
Laurie Harrisberger
- ☐ Fish & Wildlife Region 2
Jeff Drongesat
- ☐ Fish & Wildlife Region 3
Craig Weightman
- ☐ Fish & Wildlife Region 4
Julie Vance
- ☐ Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program
- ☐ Fish & Wildlife Region 6 UM
Heidi Calvert
Inyo/Mono, Habitat Conservation Program
- ☐ Dept. of Fish & Wildlife M
Becky Oka
Marine Region

Other Departments

- ☐ Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture
- ☐ Depart. of General Services
Public School Construction
- ☐ Dept. of General Services
Cathy Buck/George Carollo
Environmental Services Section
- ☐ Delta Stewardship Council
Kevan Sansam
- ☐ Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division
- ☐ Independent Commissions/Boards
Delta Protection Commission
Michael Machado

DES (Office of Emergency Services)

- ☒ Mark Roberts
Caltrans, District 8
- ☐ Gayle Rosander
Caltrans, District 9
- ☐ Tom Dumas
Caltrans, District 10
- ☐ Jacob Armstrong
Caltrans, District 11
- ☐ Maureen El Harske
Caltrans, District 12
- ☐ Monique Wilber
Native American Heritage Comm.
- ☐ Debbie Treadway
Public Utilities Commission Supervisor
- ☐ Santa Monica Bay Restoration
Guangyu Wang
- ☐ State Lands Commission
Jennifer Delaong
- ☐ Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal EPA

- ☐ Air Resources Board
Airport & Freight
Cathi Slaminski
- ☐ Transportation Projects
Nesamani Kalandiyur
- ☐ Industrial/Energy Projects
Mike Tollstrup
- ☐ State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance
- ☐ State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water
- ☐ State Water Resources Control Board
Div. Drinking Water #
- ☐ State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality
- ☐ State Water Resources Control Board
Phil Crader
Division of Water Rights
- ☐ Dept. of Toxic Substances Control
CEQA Tracking Center
- ☐ Department of Pesticide Regulation
CEQA Coordinator

Cal State Transportation Agency CalSTA

- ☐ Caltrans - Division of Aeronautics
Philip Grimmins
- ☐ Caltrans - Planning
HQ LD-JOR
Terri Pencovic
- ☐ California Highway Patrol
Suzanne Keuchir
Office of Special Projects

Dept. of Transportation

- ☐ Caltrans, District 1
Rex Jackson
- ☐ Caltrans, District 2
Marcelino Gonzalez
- ☐ Caltrans, District 3
Eric Federicks - South
Susan Zandhi - North
- ☐ Caltrans, District 4
Patricia Maurice
- ☐ Caltrans, District 5
Larry Newland
- ☐ Caltrans, District 6
Michael Navarro
- ☐ Caltrans, District 7
Dianne Watson

Regional Water Quality Control Board (RWQCB)

- ☐ RWQCB 1
Cathleen Hudson
North Coast Region (1)
- ☐ RWQCB 2
Environmental Document Coordinator
San Francisco Bay Region (2)
- ☐ RWQCB 3
Central Coast Region (3)
- ☐ RWQCB 4
Teresa Rodgers
Los Angeles Region (4)
- ☐ RWQCB 5S
Central Valley Region (5)
- ☐ RWQCB 5F
Central Valley Region (5)
Fresno Branch Office
- ☐ RWQCB 5R
Central Valley Region (5)
Redding Branch Office
- ☐ RWQCB 6
Lahontan Region (6)
- ☐ RWQCB 6V
Lahontan Region (6)
Victorville Branch Office
- ☐ RWQCB 7
Colorado River Basin Region (7)
- ☐ RWQCB 8
Santa Ana Region (8)
- ☐ RWQCB 9
San Diego Region (9)
- ☐ Other

STATE OF CALIFORNIA
NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., Suite 100
West Sacramento, CA 95601
Phone (916) 373-3710
Fax (916) 373-5471
Email: nahec@nahec.ca.gov
Website: <http://www.nahec.ca.gov>
Twitter: @CA_NAHC

Edmund G. Brown Jr., Governor



May 5, 2016

Patricia Brenes
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

RE: SCH# 2016051004 California Baptist University Specific Plan Amendment No. 1 – Planning Cases P15-0988 (Specific Plan Amendment), P-15-0989 (General Plan Amendment), P15-0987 Project, Draft Environmental Impact Report, City of Riverside, Riverside County, California

Dear Ms. Brenes:

The Native American Heritage Commission has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code § 21000 et seq.), specifically Public Resources Code section 21084.1, states that a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit. 14, § 15064.5 (b) (CEQA Guidelines Section 15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an environmental impact report (EIR) shall be prepared. (Pub. Resources Code § 21080 (d); Cal. Code Regs., tit. 14, § 15064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of project effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code § 21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code § 21084.3 (a)). **AB 52 applies to any project for which a notice of preparation or a notice of negative declaration or mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 300101, 36 C.F.R. § 800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments. **Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.**

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. **Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code § 21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code § 21073).
2. **Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code § 21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. (Pub. Resources Code § 21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code § 85352.4 (SB 18). (Pub. Resources Code § 21080.3.1 (b)).
3. **Mandatory Topics of Consultation if Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.

- b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code § 21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
- a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code § 21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code sections 6254 (f) and 6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code § 21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code section 21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code § 21082.3 (b)).
7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
- a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code § 21080.3.2 (b)).
8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code section 21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code section 21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code § 21082.3 (a)).
9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code section 21084.3 (b). (Pub. Resources Code § 21082.3 (e)).
10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
- a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code § 21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a nonfederally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code § 815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code § 5097.991).
11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An environmental impact report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code sections 21080.3.1 and 21080.3.2 and concluded pursuant to Public Resources Code section 21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code section 21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code § 21082.3 (d)).
- This process should be documented in the Cultural Resources section of your environmental document.*

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code § 65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe. (Gov. Code § 65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code section 65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code sections 5097.9 and 5097.993 that are within the city's or county's jurisdiction. (Gov. Code § 65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

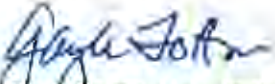
To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or banning both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have been already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.
3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, section 15064.5(f) (CEQA Guidelines section 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code

section 7050.5, Public Resources Code section 5097.98, and Cal. Code Regs., tit. 14, section 15064.5, subdivisions (d) and (e) (CEQA Guidelines section 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

Please contact me if you need any additional information at gayle.totton@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gayle Totton".

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst

cc: State Clearinghouse

DEPARTMENT OF TRANSPORTATION

DISTRICT 8

PLANNING

464 WEST 4th STREET, 6th Floor MS 725

SAN BERNARDINO, CA 92401-1400

PHONE (909) 383-4557

FAX (909) 383-6890

TTY (909) 383-6300

*Serious drought
Help save water!*

May 10, 2016

Patricia Brenes

Principal Planner

City of Riverside

Community and Economic

Development Department

3900 Main Street, 3rd Floor

Riverside, CA 92522

Notice of Preparation of a Draft Environmental Impact Report (EIR) for California Baptist University Specific Plan Amendment No. 1 (RIV 91 PM 15.62)

Ms. Brenes,

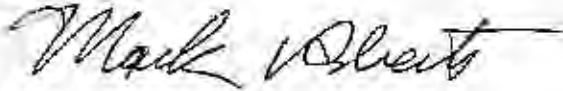
We have completed our review for the above mentioned project which is located north of State Route 91 (SR-91) at 8432 Magnolia Avenue in the City of Riverside. This project proposes the expansion of Cal-Baptist University's property to be encompassed by Adams Street, Diana Street, Monroe Street, and Magnolia Avenue.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act (CEQA), it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the City of Riverside due to the Project's potential impact to State facilities it is also subject to the policies and regulations that govern the SHS.

It appears that this project will have no substantial impact on the State Highway System (SHS) and therefore we have no further comments at this time. However, should the proposed project be modified in any way we ask that you please forward copies of revised plans as necessary to Caltrans so that we may reevaluate potential impacts to the SHS.

If you have any questions regarding this letter, please contact Talvin Dennis at (909) 806-3957 or myself at (909) 383-4557 for assistance.

Sincerely,



Mark Roberts
Office Chief
Intergovernmental Review, Community and Regional Planning



**South Coast
AQMD**

**South Coast
Air Quality Management District**
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 11, 2016

pbrenes@riversideca.gov

Ms. Patricia Brenes, Principal Planner

City of Riverside –Community and Economic Development Department

3900 Main St., 3rd Floor

Riverside, CA 92522

**Notice of Preparation of a CEQA Document for the
California Baptist University Specific Plan Amendment No. 1**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the Draft EIR. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the Draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a Draft EIR. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead

agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/cli/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at jcheng@aqmd.gov or call me at (909) 396-2448.

Sincerely,

Jillian Wong

Jillian Wong, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

JC:JW
RVC160503-19-03
Control Number



**THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA**

Office of the General Manager

May 19, 2016

Ms. Patricia Brenes, Principal Planner
City of Riverside
Community and Economic Development Department
3900 Main Street, 3rd Floor
Riverside, CA 92522

Dear Ms. Brenes:

Notice of Preparation of a Draft
Environmental Report (EIR) for California Baptist University Specific Plan Amendment No. 1

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Preparation (NOP) for the California Baptist University Specific Plan Amendment No. 1 (Project). The proposed Project is an amendment to the California Baptist University Specific Plan, Planning Cases P15-0988 (Specific Plan Amendment), P15-0898 (General Plan Amendment), P15-0987 (Change of Zone), and P15-0990 (Environmental Impact Report). The Project, located at 8432 Magnolia Avenue in the City of Riverside, seeks to change land use designations in the Specific Plan to include different height and density requirements. These changes will allow California Baptist University to accommodate a projected increase in student enrollment from the approximately 8,400 students currently enrolled to 12,000 students by 2025. The new plan will include new and reconfigured educational, housing, administrative support, athletic, and other facilities within the main campus area. In addition, support and ancillary facilities may be established on University-owned properties not contiguous to the main campus. An additional 146,000 square feet of building area is anticipated.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member agencies serving about 19 million people in portions of six counties in Southern California, including Los Angeles, Orange, Riverside, San Bernardino, and San Diego Counties. Metropolitan's mission is to provide its 5,200 mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way.

Our review of the NOP indicates that Metropolitan owns and operates the 124-inch-inside-diameter Upper Feeder Pipeline, along with a 40-foot wide permanent easement adjacent to the proposed Project site (see enclosed map). Our right-of-way is operated and maintained by Metropolitan for the purpose of water supply and any proposed use for this property should be

Ms. Patricia Brenes, Principal Planner

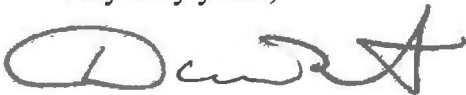
Page 2

May 19, 2016

consistent with this use and must be approved by Metropolitan in writing. In order to avoid potential conflicts with Metropolitan's right-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines, canals, or facilities be submitted for our review and written approval to the attention of Metropolitan's Substructures Team. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by contacting Metropolitan's Substructures Team at EngineeringSubstructures@mwdh2o.com. To assist the applicant in preparing plans that are compatible with Metropolitan's facilities and easements, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easement of the Metropolitan Water District of Southern California." Please note that all submitted designs of plans must clearly identify Metropolitan's facilities and right-of-way.

Metropolitan appreciates the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation, including a copy of the Draft Environmental Impact Report. If we can be of further assistance, please contact Ms. Malinda Stalvey of the Environmental Planning Team at (213) 217-5545.

Very truly yours,






Deirdre West
Manager, Environmental Planning Team

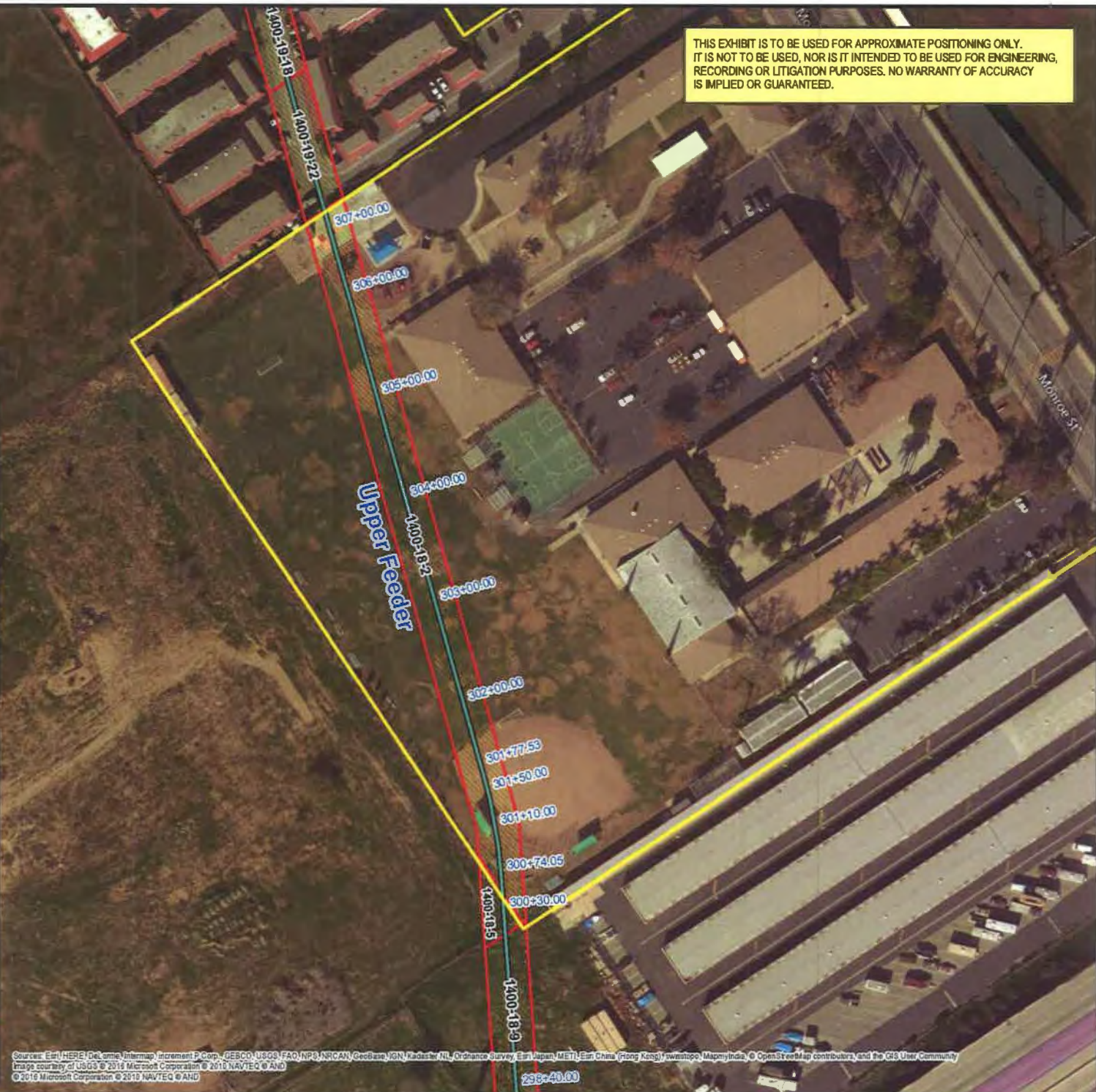
MKS/mks

(J:\Environmental-Planning & Compliance\COMPLETED JOBS\May 2016\Job No. 20160502EXT)

Enclosures: Planning Guidelines and Map of Metropolitan's Facilities in Project Vicinity

-  Project Boundary
-  MWD Mainlines
-  MWD Right of Way

THIS EXHIBIT IS TO BE USED FOR APPROXIMATE POSITIONING ONLY. IT IS NOT TO BE USED, NOR IS IT INTENDED TO BE USED FOR ENGINEERING, RECORDING OR LITIGATION PURPOSES. NO WARRANTY OF ACCURACY IS IMPLIED OR GUARANTEED.



Source: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community
 Image courtesy of USGS © 2016 Microsoft Corporation © 2016 NAVTEQ © AND
 © 2016 Microsoft Corporation © 2016 NAVTEQ © AND

Guidelines for Developments in the
Area of Facilities, Fee Properties, and/or Easements
of The Metropolitan Water District of Southern California

1. Introduction

a. The following general guidelines should be followed for the design of proposed facilities and developments in the area of Metropolitan's facilities, fee properties, and/or easements.

b. We require that 3 copies of your tentative and final record maps, grading, paving, street improvement, landscape, storm drain, and utility plans be submitted for our review and written approval as they pertain to Metropolitan's facilities, fee properties and/or easements, prior to the commencement of any construction work.

2. Plans, Parcel and Tract Maps

The following are Metropolitan's requirements for the identification of its facilities, fee properties, and/or easements on your plans, parcel maps and tract maps:

a. Metropolitan's fee properties and/or easements and its pipelines and other facilities must be fully shown and identified as Metropolitan's on all applicable plans.

b. Metropolitan's fee properties and/or easements must be shown and identified as Metropolitan's with the official recording data on all applicable parcel and tract maps.

c. Metropolitan's fee properties and/or easements and existing survey monuments must be dimensionally tied to the parcel or tract boundaries.

d. Metropolitan's records of surveys must be referenced on the parcel and tract maps.

3. Maintenance of Access Along Metropolitan's Rights-of-Way

a. Proposed cut or fill slopes exceeding 10 percent are normally not allowed within Metropolitan's fee properties or easements. This is required to facilitate the use of construction and maintenance equipment, and provide access to its aboveground and belowground facilities.

b. We require that 16-foot-wide commercial-type driveway approaches be constructed on both sides of all streets crossing Metropolitan's rights-of-way. Openings are required in any median island. Access ramps, if necessary, must be at least 16-feet-wide. Grades of ramps are normally not allowed to exceed 10 percent. If the slope of an access ramp must exceed 10 percent due to the topography, the ramp must be paved. We require a 40-foot-long level area on the driveway approach to access ramps where the ramp meets the street. At Metropolitan's fee properties, we may require fences and gates.

c. The terms of Metropolitan's permanent easement deeds normally preclude the building or maintenance of structures of any nature or kind within its easements, to ensure safety and avoid interference with operation and maintenance of Metropolitan's pipelines or other facilities. Metropolitan must have vehicular access along the easements at all times for inspection, patrolling, and for maintenance of the pipelines and other facilities on a routine basis. We require a 20-foot-wide clear zone around all above-ground facilities for this routine access. This clear zone should slope away from our facility on a grade not to exceed 2 percent. We must also have access along the easements with construction equipment. An example of this is shown on Figure 1.

d. The footings of any proposed buildings adjacent to Metropolitan's fee properties and/or easements must not encroach into the fee property or easement or impose additional loading on Metropolitan's pipelines or other facilities therein. A typical situation is shown on Figure 2. Prints of the detail plans of the footings for any building or structure adjacent to the fee property or easement must be submitted for our review and written approval as they pertain to the pipeline or other facilities therein. Also, roof eaves of buildings adjacent to the easement or fee property must not overhang into the fee property or easement area.

e. Metropolitan's pipelines and other facilities, e.g. structures, manholes, equipment, survey monuments, etc. within its fee properties and/or easements must be protected from damage by the easement holder on Metropolitan's property or the property owner where Metropolitan has an easement, at no expense to Metropolitan. If the facility is a cathodic protection station it shall be located prior to any grading or excavation. The exact location, description and way of protection shall be shown on the related plans for the easement area.

4. Easements on Metropolitan's Property

a. We encourage the use of Metropolitan's fee rights-of-way by governmental agencies for public street and utility purposes, provided that such use does not interfere with Metropolitan's use of the property, the entire width of the property is accepted into the agency's public street system and fair market value is paid for such use of the right-of-way.

b. Please contact the Director of Metropolitan's Right of Way and Land Division, telephone (213) 250-6302, concerning easements for landscaping, street, storm drain, sewer, water or other public facilities proposed within Metropolitan's fee properties. A map and legal description of the requested easements must be submitted. Also, written evidence must be submitted that shows the city or county will accept the easement for the specific purposes into its public system. The grant of the easement will be subject to Metropolitan's rights to use its land for water pipelines and related purposes to the same extent as if such grant had not been made. There will be a charge for the easement. Please note that, if entry is required on the property prior to issuance of the easement, an entry permit must be obtained. There will also be a charge for the entry permit.

5. Landscaping

Metropolitan's landscape guidelines for its fee properties and/or easements are as follows:

a. A green belt may be allowed within Metropolitan's fee property or easement.

b. All landscape plans shall show the location and size of Metropolitan's fee property and/or easement and the location and size of Metropolitan's pipeline or other facilities therein.

c. Absolutely no trees will be allowed within 15 feet of the centerline of Metropolitan's existing or future pipelines and facilities.

d. Deep-rooted trees are prohibited within Metropolitan's fee properties and/or easements. Shallow-rooted trees are the only trees allowed. The shallow-rooted trees will not be permitted any closer than 15 feet from the centerline of the pipeline, and such trees shall not be taller than 25 feet with a root spread no greater than 20 feet in diameter at maturity. Shrubs, bushes, vines, and ground cover are permitted, but larger shrubs and bushes should not be planted directly over our pipeline. Turf is acceptable. We require submittal of landscape plans for Metropolitan's prior review and written approval. (See Figure 3).

e. The landscape plans must contain provisions for Metropolitan's vehicular access at all times along its rights-of-way to its pipelines or facilities therein. Gates capable of accepting Metropolitan's locks are required in any fences across its rights-of-way. Also, any walks or drainage facilities across its access route must be constructed to AASHTO H-20 loading standards.

f. Rights to landscape any of Metropolitan's fee properties must be acquired from its Right of Way and Land Division. Appropriate entry permits must be obtained prior to any entry on its property. There will be a charge for any entry permit or easements required.

6. Fencing

Metropolitan requires that perimeter fencing of its fee properties and facilities be constructed of universal chain link, 6 feet in height and topped with 3 strands of barbed wire angled upward and outward at a 45 degree angle or an approved equal for a total fence height of 7 feet. Suitable substitute fencing may be considered by Metropolitan. (Please see Figure 5 for details).

7. Utilities in Metropolitan's Fee Properties and/or Easements or Adjacent to Its Pipeline in Public Streets

Metropolitan's policy for the alinement of utilities permitted within its fee properties and/or easements and street rights-of-way is as follows:

a. Permanent structures, including catch basins, manholes, power poles, telephone riser boxes, etc., shall not be located within its fee properties and/or easements.

b. We request that permanent utility structures within public streets, in which Metropolitan's facilities are constructed under the Metropolitan Water District Act, be placed as far from our pipeline as possible, but not closer than 5 feet from the outside of our pipeline.

c. The installation of utilities over or under Metropolitan's pipeline(s) must be in accordance with the requirements shown on the enclosed prints of Drawings Nos. C-11632 and C-9547. Whenever possible we request a minimum of one foot clearance between Metropolitan's pipe and your facility. Temporary support of Metropolitan's pipe may also be required at undercrossings of its pipe in an open trench. The temporary support plans must be reviewed and approved by Metropolitan.

d. Lateral utility crossings of Metropolitan's pipelines must be as perpendicular to its pipeline alignment as practical. Prior to any excavation our pipeline shall be located manually and any excavation within two feet of our pipeline must be done by hand. This shall be noted on the appropriate drawings.

e. Utilities constructed longitudinally within Metropolitan's rights-of-way must be located outside the theoretical trench prism for uncovering its pipeline and must be located parallel to and as close to its rights-of-way lines as practical.

f. When piping is jacked or installed in jacked casing or tunnel under Metropolitan's pipe, there must be at least two feet of vertical clearance between the bottom of Metropolitan's pipe and the top of the jacked pipe, jacked casing or tunnel. We also require that detail drawings of the shoring for the jacking or tunneling pits be submitted for our review and approval. Provisions must be made to grout any voids around the exterior of the jacked pipe, jacked casing or tunnel. If the piping is installed in a jacked casing or tunnel the annular space between the piping and the jacked casing or tunnel must be filled with grout.

g. Overhead electrical and telephone line requirements:

1) Conductor clearances are to conform to the California State Public Utilities Commission, General Order 95, for Overhead Electrical Line Construction or at a greater clearance if required by Metropolitan. Under no circumstances shall clearance be less than 35 feet.

2) A marker must be attached to the power pole showing the ground clearance and line voltage, to help prevent damage to your facilities during maintenance or other work being done in the area.

3) Line clearance over Metropolitan's fee properties and/or easements shall be shown on the drawing to indicate the lowest point of the line under the most adverse conditions including consideration of sag, wind load, temperature change, and support type. We require that overhead lines be located at least 30 feet laterally away from all above-ground structures on the pipelines.

4) When underground electrical conduits, 120 volts or greater, are installed within Metropolitan's fee property and/or easement, the conduits must be incased in a minimum of three inches of red concrete. Where possible, above ground warning signs must also be placed at the right-of-way lines where the conduits enter and exit the right-of-way.

h. The construction of sewerlines in Metropolitan's fee properties and/or easements must conform to the California Department of Health Services Criteria for the Separation of Water Mains and Sanitary Services and the local City or County Health Code Ordinance as it relates to installation of sewers in the vicinity of pressure waterlines. The construction of sewerlines should also conform to these standards in street rights-of-way.

i. Cross sections shall be provided for all pipeline crossings showing Metropolitan's fee property and/or easement limits and the location of our pipeline(s). The exact locations of the crossing pipelines and their elevations shall be marked on as-built drawings for our information.

j. Potholing of Metropolitan's pipeline is required if the vertical clearance between a utility and Metropolitan's pipeline is indicated on the plan to be one foot or less. If the indicated clearance is between one and two feet, potholing is suggested. Metropolitan will provide a representative to assist others in locating and identifying its pipeline. Two-working days notice is requested.

k. Adequate shoring and bracing is required for the full depth of the trench when the excavation encroaches within the zone shown on Figure 4.

l. The location of utilities within Metropolitan's fee property and/or easement shall be plainly marked to help prevent damage during maintenance or other work done in the area. Detectable tape over buried utilities should be placed a minimum of 12 inches above the utility and shall conform to the following requirements:

1) Water pipeline: A two-inch blue warning tape shall be imprinted with:

"CAUTION BURIED WATER PIPELINE"

2) Gas, oil, or chemical pipeline: A two-inch yellow warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

3) Sewer or storm drain pipeline: A two-inch green warning tape shall be imprinted with:

"CAUTION BURIED _____ PIPELINE"

4) Electric, street lighting, or traffic signals conduit: A two-inch red warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

5) Telephone, or television conduit: A two-inch orange warning tape shall be imprinted with:

"CAUTION BURIED _____ CONDUIT"

m. Cathodic Protection requirements:

1) If there is a cathodic protection station for Metropolitan's pipeline in the area of the proposed work, it shall be located prior to any grading or excavation. The exact location, description and manner of protection shall be shown on all applicable plans. Please contact Metropolitan's Corrosion Engineering Section, located at Metropolitan's F. E. Weymouth Softening and Filtration Plant, 700 North Moreno Avenue, La Verne, California 91750, telephone (714) 593-7474, for the locations of Metropolitan's cathodic protection stations.

2) If an induced-current cathodic protection system is to be installed on any pipeline crossing Metropolitan's pipeline, please contact Mr. Wayne E. Risner at (714) 593-7474 or (213) 250-5085. He will review the proposed system and determine if any conflicts will arise with the existing cathodic protection systems installed by Metropolitan.

3) Within Metropolitan's rights-of-way, pipelines and carrier pipes (casings) shall be coated with an approved protective coating to conform to Metropolitan's requirements, and shall be maintained in a neat and orderly condition as directed by Metropolitan. The application and monitoring of cathodic protection on the pipeline and casing shall conform to Title 49 of the Code of Federal Regulations, Part 195.

4) If a steel carrier pipe (casing) is used:

(a) Cathodic protection shall be provided by use of a sacrificial magnesium anode (a sketch showing the cathodic protection details can be provided for the designers information).

(b) The steel carrier pipe shall be protected with a coal tar enamel coating inside and out in accordance with AWWA C203 specification.

n. All trenches shall be excavated to comply with the CAL/OSHA Construction Safety Orders, Article 6, beginning with Sections 1539 through 1547. Trench backfill shall be placed in 8-inch lifts and shall be compacted to 95 percent relative compaction (ASTM D698) across roadways and through protective dikes. Trench backfill elsewhere will be compacted to 90 percent relative compaction (ASTM D698).

o. Control cables connected with the operation of Metropolitan's system are buried within streets, its fee properties and/or easements. The locations and elevations of these cables shall be shown on the drawings. The drawings shall note that prior to any excavation in the area, the control cables shall be located and measures shall be taken by the contractor to protect the cables in place.

p. Metropolitan is a member of Underground Service Alert (USA). The contractor (excavator) shall contact USA at 1-800-422-4133 (Southern California) at least 48 hours prior to starting any excavation work. The contractor will be liable for any damage to Metropolitan's facilities as a result of the construction.

8. Paramount Right

Facilities constructed within Metropolitan's fee properties and/or easements shall be subject to the paramount right of Metropolitan to use its fee properties and/or easements for the purpose for which they were acquired. If at any time Metropolitan or its assigns should, in the exercise of their rights, find it necessary to remove any of the facilities from the fee properties and/or easements, such removal and replacement shall be at the expense of the owner of the facility.

9. Modification of Metropolitan's Facilities

When a manhole or other of Metropolitan's facilities must be modified to accommodate your construction or reconstruction, Metropolitan will modify the facilities with its forces. This should be noted on the construction plans. The estimated cost to perform this modification will be given to you and we will require a deposit for this amount before the work is performed. Once the deposit is received, we will schedule the work. Our forces will coordinate the work with your contractor. Our final billing will be based on actual cost incurred, and will include materials, construction, engineering plan review, inspection, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount.

10. Drainage

a. Residential or commercial development typically increases and concentrates the peak storm water runoff as well as the total yearly storm runoff from an area, thereby increasing the requirements for storm drain facilities downstream of the development. Also, throughout the year water from landscape irrigation, car washing, and other outdoor domestic water uses flows into the storm drainage system resulting in weed abatement, insect infestation, obstructed access and other problems. Therefore, it is Metropolitan's usual practice not to approve plans that show discharge of drainage from developments onto its fee properties and/or easements.

b. If water must be carried across or discharged onto Metropolitan's fee properties and/or easements, Metropolitan will insist that plans for development provide that it be carried by closed conduit or lined open channel approved in writing by Metropolitan. Also the drainage facilities must be maintained by others, e.g., city, county, homeowners association, etc. If the development proposes changes to existing drainage features, then the developer shall make provisions to provide for replacement and these changes must be approved by Metropolitan in writing.

11. Construction Coordination

During construction, Metropolitan's field representative will make periodic inspections. We request that a stipulation be added to the plans or specifications for notification of Mr. _____ of Metropolitan's Operations Services Branch, telephone (213) 250-_____, at least two working days prior to any work in the vicinity of our facilities.

12. Pipeline Loading Restrictions

a. Metropolitan's pipelines and conduits vary in structural strength, and some are not adequate for AASHTO H-20 loading. Therefore, specific loads over the specific sections of pipe or conduit must be reviewed and approved by Metropolitan. However, Metropolitan's pipelines are typically adequate for AASHTO H-20 loading provided that the cover over the pipeline is not less than four feet or the cover is not substantially increased. If the temporary cover over the pipeline during construction is between three and four feet, equipment must be restricted to that which

imposes loads no greater than AASHTO H-10. If the cover is between two and three feet, equipment must be restricted to that of a Caterpillar D-4 tract-type tractor. If the cover is less than two feet, only hand equipment may be used. Also, if the contractor plans to use any equipment over Metropolitan's pipeline which will impose loads greater than AASHTO H-20, it will be necessary to submit the specifications of such equipment for our review and approval at least one week prior to its use. More restrictive requirements may apply to the loading guideline over the San Diego Pipelines 1 and 2, portions of the Orange County Feeder, and the Colorado River Aqueduct. Please contact us for loading restrictions on all of Metropolitan's pipelines and conduits.

b. The existing cover over the pipeline shall be maintained unless Metropolitan determines that proposed changes do not pose a hazard to the integrity of the pipeline or an impediment to its maintenance.

13. Blasting

a. At least 20 days prior to the start of any drilling for rock excavation blasting, or any blasting, in the vicinity of Metropolitan's facilities, a two-part preliminary conceptual plan shall be submitted to Metropolitan as follows:

b. Part 1 of the conceptual plan shall include a complete summary of proposed transportation, handling, storage, and use of explosions.

c. Part 2 shall include the proposed general concept for blasting, including controlled blasting techniques and controls of noise, fly rock, airblast, and ground vibration.

14. CEQA Requirements

a. When Environmental Documents Have Not Been Prepared

1) Regulations implementing the California Environmental Quality Act (CEQA) require that Metropolitan have an opportunity to consult with the agency or consultants preparing any environmental documentation. We are required to review and consider the environmental effects of the project as shown in the Negative Declaration or Environmental Impact Report (EIR) prepared for your project before committing Metropolitan to approve your request.

2) In order to ensure compliance with the regulations implementing CEQA where Metropolitan is not the Lead Agency, the following minimum procedures to ensure compliance with the Act have been established:

a) Metropolitan shall be timely advised of any determination that a Categorical Exemption applies to the project. The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

b) Metropolitan is to be consulted during the preparation of the Negative Declaration or EIR.

c) Metropolitan is to review and submit any necessary comments on the Negative Declaration or draft EIR.

d) Metropolitan is to be indemnified for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

b. When Environmental Documents Have Been Prepared

If environmental documents have been prepared for your project, please furnish us a copy for our review and files in a timely manner so that we may have sufficient time to review and comment. The following steps must also be accomplished:

1) The Lead Agency is to advise Metropolitan that it and other agencies participating in the project have complied with the requirements of CEQA prior to Metropolitan's participation.

2) You must agree to indemnify Metropolitan, its officers, engineers, and agents for any costs or liability arising out of any violation of any laws or regulations including but not limited to the California Environmental Quality Act and its implementing regulations.

15. Metropolitan's Plan-Review Cost

a. An engineering review of your proposed facilities and developments and the preparation of a letter response

giving Metropolitan's comments, requirements and/or approval that will require 8 man-hours or less of effort is typically performed at no cost to the developer, unless a facility must be modified where Metropolitan has superior rights. If an engineering review and letter response requires more than 8 man-hours of effort by Metropolitan to determine if the proposed facility or development is compatible with its facilities, or if modifications to Metropolitan's manhole(s) or other facilities will be required, then all of Metropolitan's costs associated with the project must be paid by the developer, unless the developer has superior rights.

b. A deposit of funds will be required from the developer before Metropolitan can begin its detailed engineering plan review that will exceed 8 hours. The amount of the required deposit will be determined after a cursory review of the plans for the proposed development.

c. Metropolitan's final billing will be based on actual cost incurred, and will include engineering plan review, inspection, materials, construction, and administrative overhead charges calculated in accordance with Metropolitan's standard accounting practices. If the cost is less than the deposit, a refund will be made; however, if the cost exceeds the deposit, an invoice will be forwarded for payment of the additional amount. Additional deposits may be required if the cost of Metropolitan's review exceeds the amount of the initial deposit.

16. Caution

We advise you that Metropolitan's plan reviews and responses are based upon information available to Metropolitan which was prepared by or on behalf of Metropolitan for general record purposes only. Such information may not be sufficiently detailed or accurate for your purposes. No warranty of any kind, either express or implied, is attached to the information therein conveyed as to its accuracy, and no inference should be drawn from Metropolitan's failure to comment on any aspect of your project. You are therefore cautioned to make such surveys and other field investigations as you may deem prudent to assure yourself that any plans for your project are correct.

17. Additional Information

Should you require additional information, please contact:

Civil Engineering Substructures Section
Metropolitan Water District
of Southern California
P.O. Box 54153
Los Angeles, California 90054-0153
(213) 217-6000

JEH/MRW/lk

Rev. January 22, 1989

Encl.

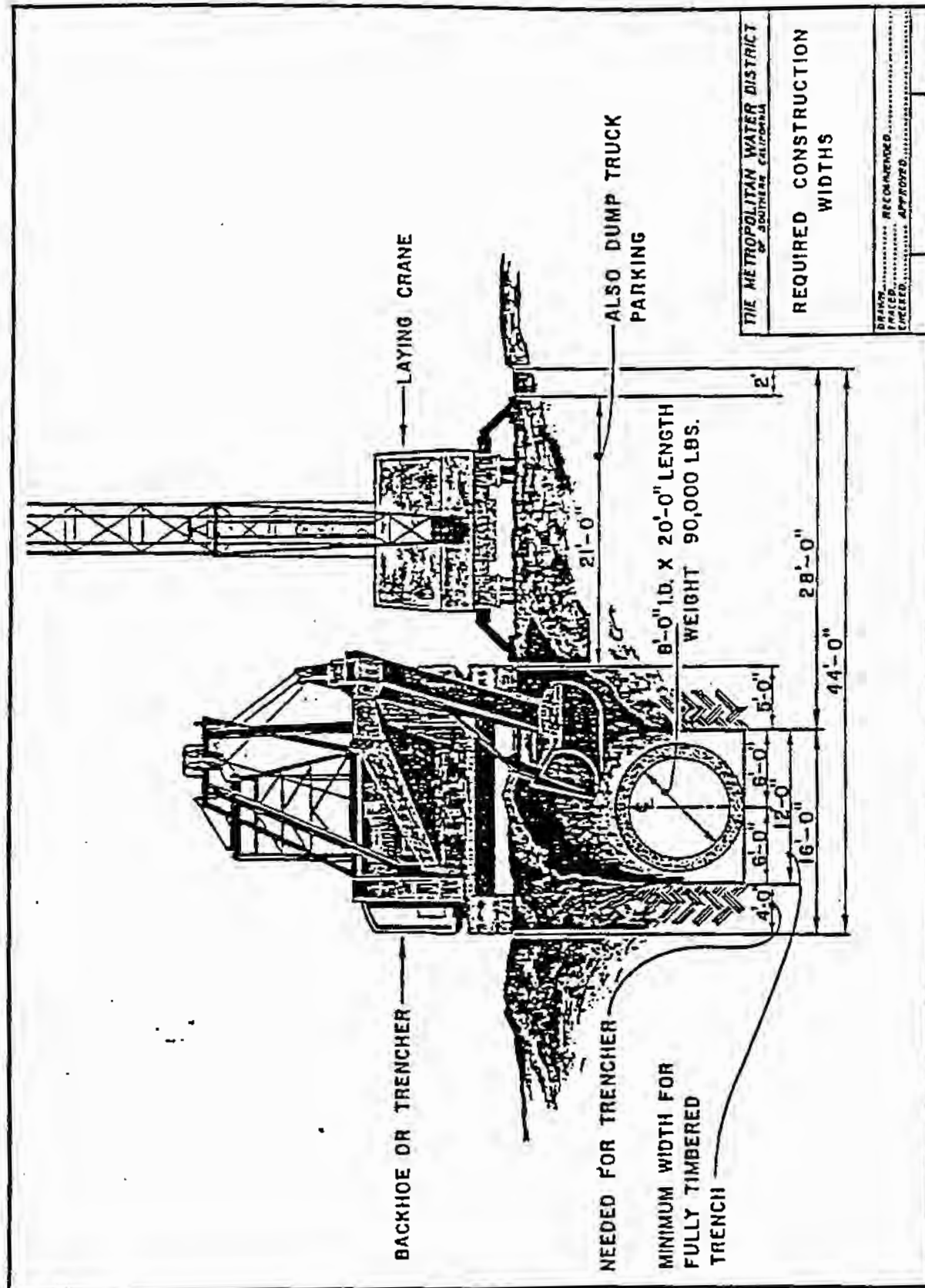
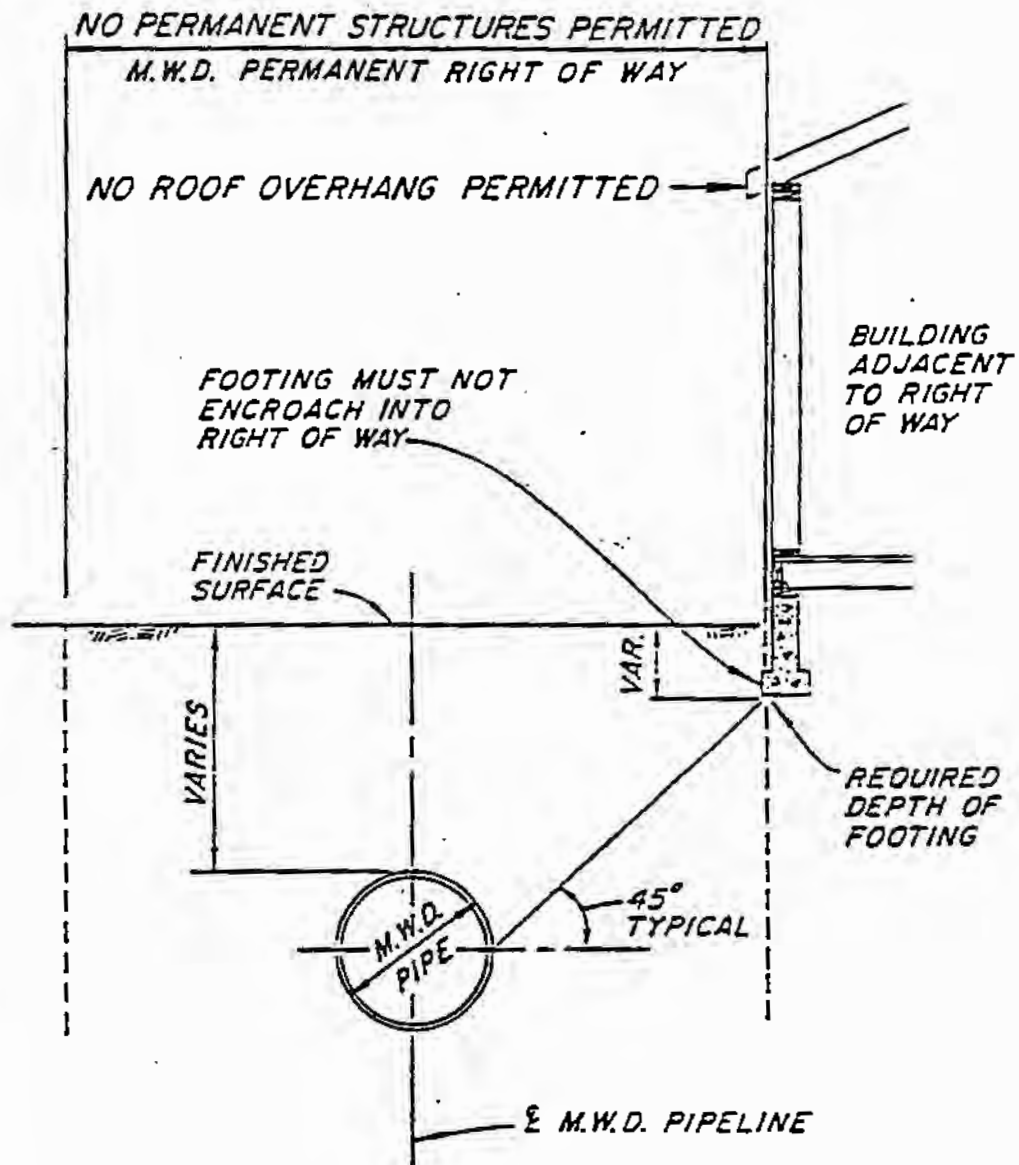


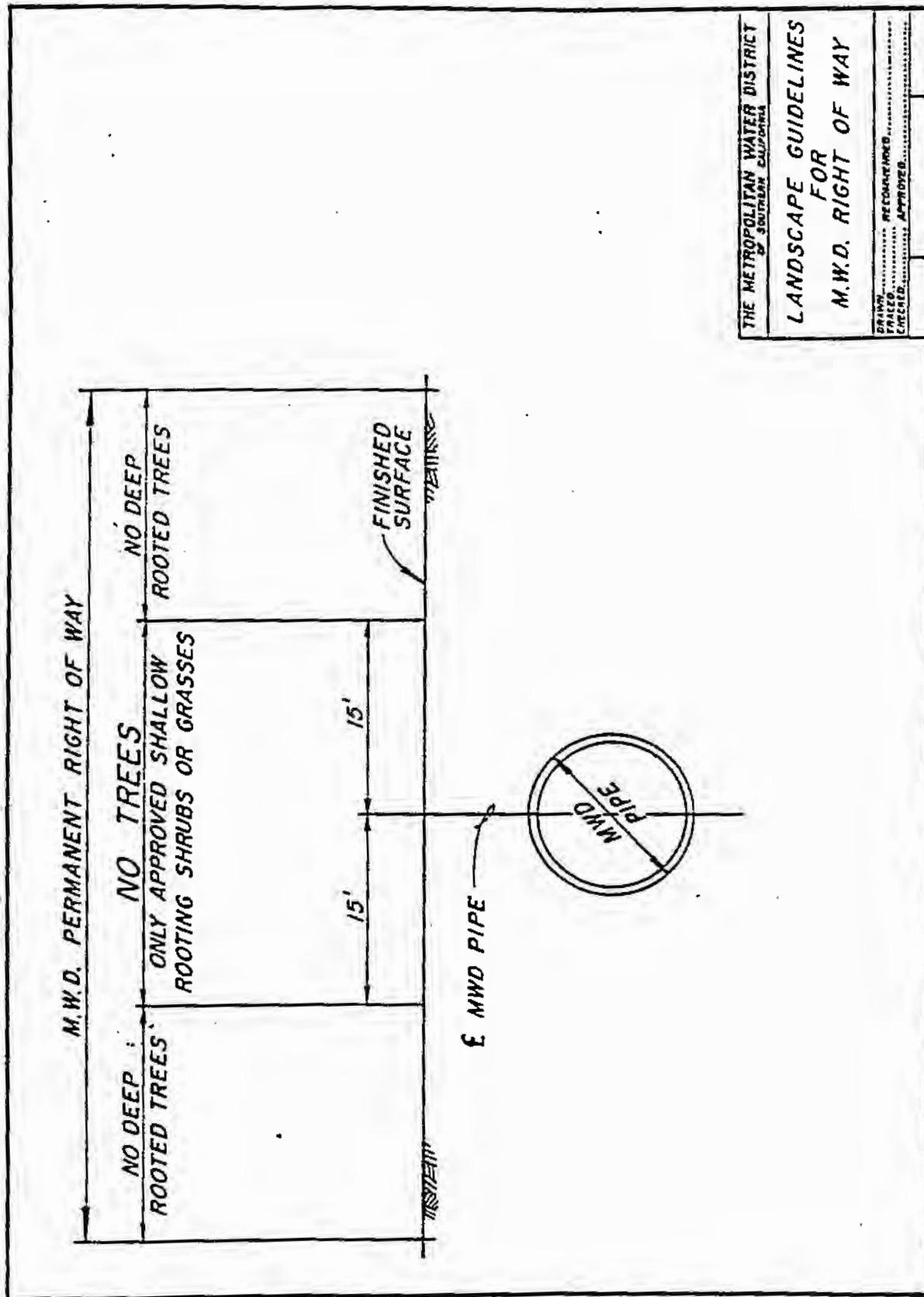
FIGURE 1



NOTE: M.W.D. PIPELINE SIZE, DEPTH, LOCATION AND WIDTH OF PERMANENT RIGHT OF WAY VARIES.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA	
REQUIREMENTS FOR BUILDINGS AND FOOTINGS ADJACENT TO M.W.D. RIGHT OF WAY	
DRAWN	RECOMMENDED
TRACED	APPROVED
CHECKED	

FIGURE 2



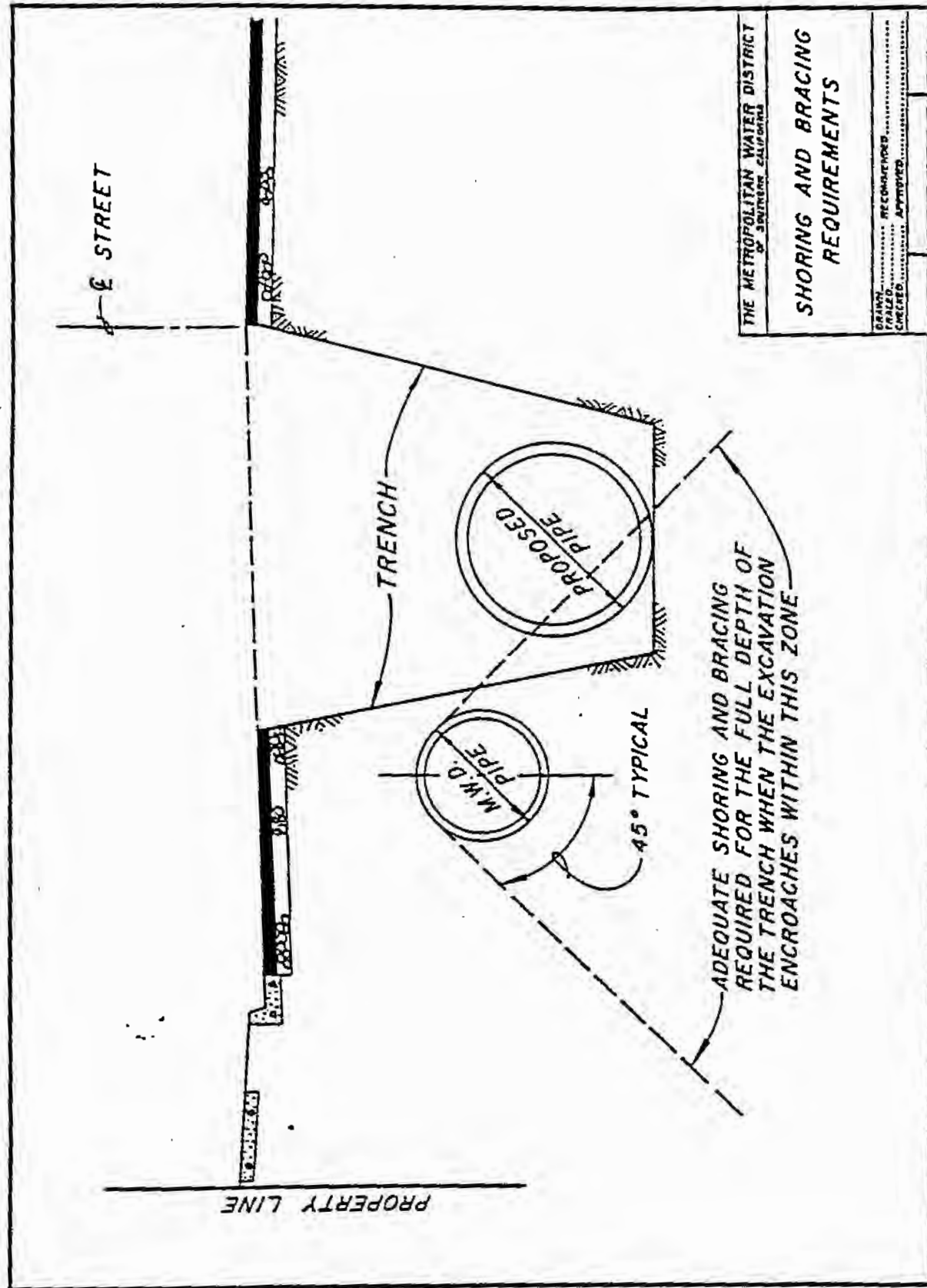
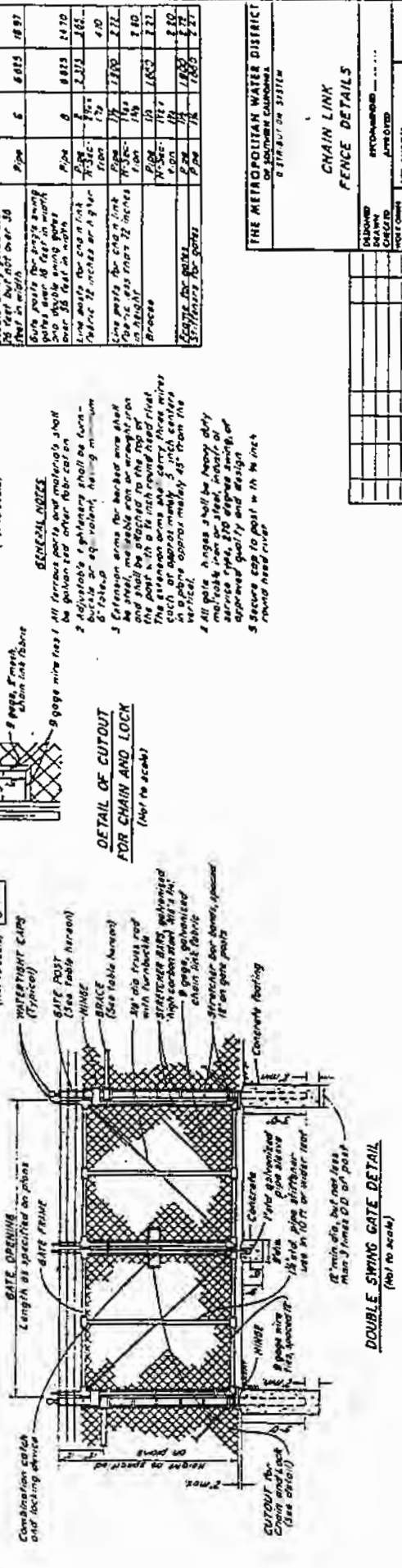
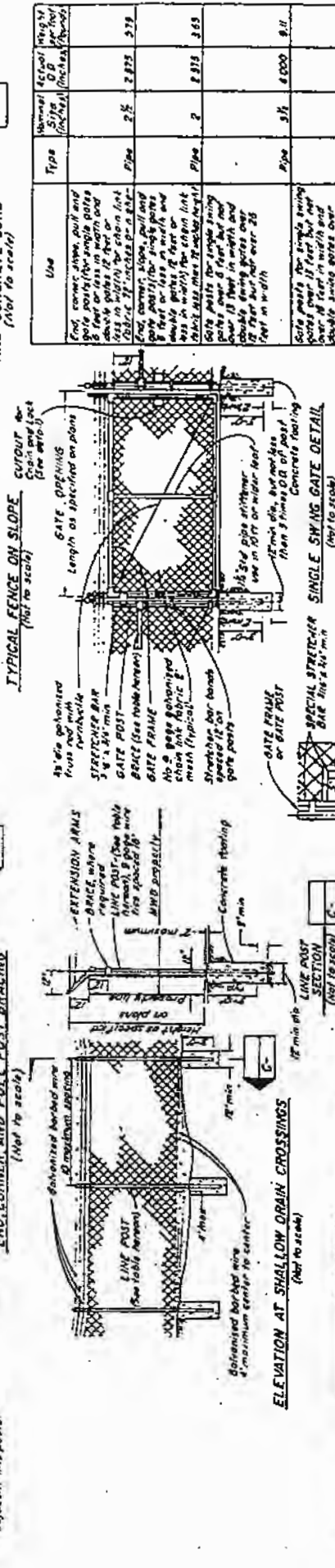
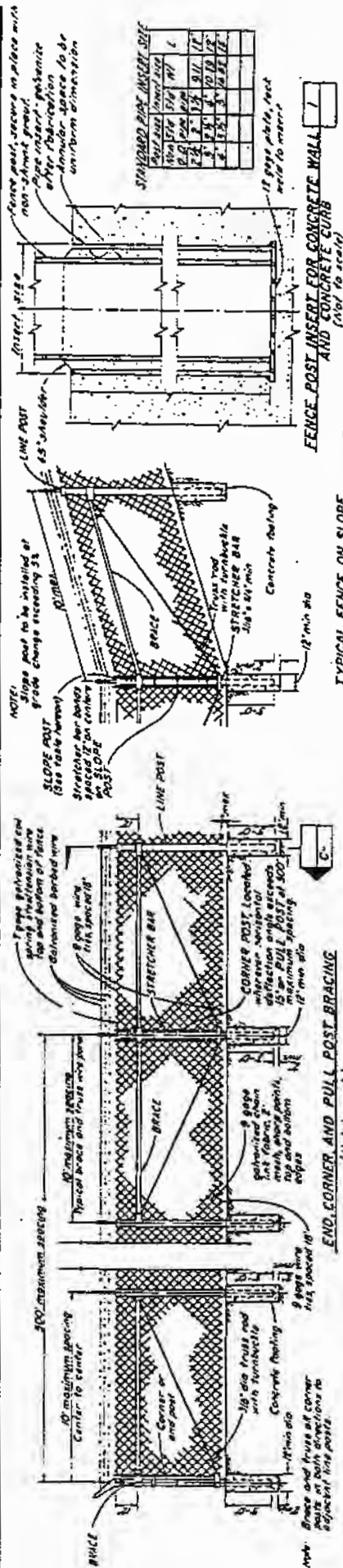


FIGURE 4

SPECIFICATIONS NO.

SHEET NO.

[illegible]

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA
A SUBURBAN SYSTEM

CHAIN LINK
FENCE DETAILS

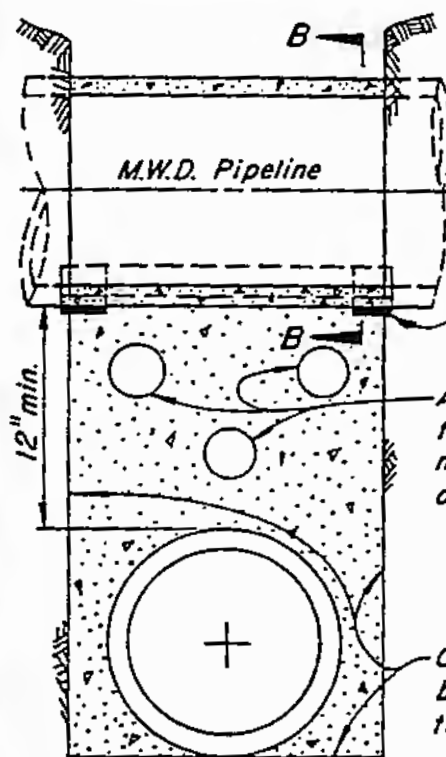
DATE: 10/27/77
DRAWN BY: J. L. P. 10/27/77
CHECKED BY: J. L. P. 10/27/77
APPROVED BY: J. L. P. 10/27/77

[illegible]

SWING GATE DETAIL
(Not to scale)

DOUBLE

[illegible]

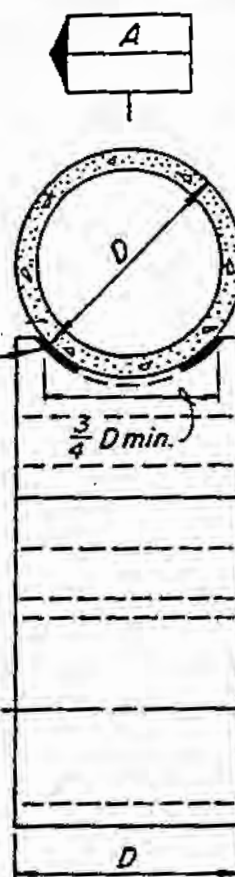


SECTION "A-A"

$\frac{3}{4}$ " x 6" premolded expansion joint filler

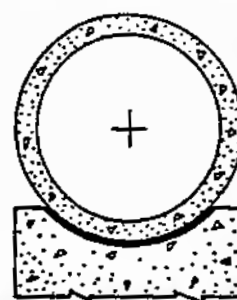
Apertures as directed by the Engineer, total volume not to exceed $\frac{1}{2}$ the volume of the supporting wall

Concrete support wall to be placed against undisturbed ground



CROSS SECTION

1. Supporting wall shall have a firm bearing on the subgrade and against the side of the excavation.
2. Premolded expansion joint filler per ASTM D-1751-73 to be used in support for steel pipe only.
3. If trench width is 4 feet or greater, measured along centerline of M.W.D. pipe, concrete support must be constructed.
4. If trench width is less than 4 feet, clean sand backfill, compacted to 90% density in accordance with the provisions of ASTM Standard D-1557-70 may be used in lieu of the concrete support wall.



SECTION "B-B"

THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

TYPICAL SUPPORT FOR
M.W.D. PIPELINE

DRAWN: _____ RECOMMENDED: _____
TRACED: _____ APPROVED: _____
CHECKED: _____

C-9547



Matthew Rodriguez
Secretary for
Environmental Protection



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor

June 2, 2016

Ms. Patricia Brenes (pbrenes@riversideca.gov)
City of Riverside
3900 Main Street, 3rd Floor
Riverside, California 92522

DTSC COMMENTS ON THE NOTICE OF PREPARATION FOR THE CALIFORNIA BAPTIST UNIVERSITY SPECIFIC PLAN AMENDMENT NO. 1 DRAFT ENVIRONMENTAL IMPACT REPORT, RIVERSIDE (SCH# 2016051004)

Dear Ms. Brenes:

The Department of Toxic Substances Control (DTSC) has reviewed the Notice of Preparation (NOP) of a draft Environmental Impact Report (EIR) for the California Baptist University Specific Plan Amendment No. 1 – Planning Cases P15-0988 (Specific Plan Amendment), P15-0989 (General Plan Amendment), P15-0987 dated May 2, 2016 and received by DTSC on May 4, 2016. The proposed project in an amendment to the California Baptist University Specific Plan. Although the due date to submit comments was May 31, 2016, DTSC would like to provide the following comments:

1. If the existing project buildings were constructed prior to 1978, lead based paint and organochlorine pesticides (from termiticide applications) may be potential environmental concerns. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's *"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.
2. If the project area was previously used for agricultural purposes, pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision),"* dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.

Ms. Patricia Brenes

June 2, 2016

Page 2

3. If a response action is required based on the results of the above investigations, and/or other information, the draft Environmental Impact Report (EIR) will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Div. 13, §21000 et seq.) and its implementing Guidelines (CCR, Title 14, §15000 et seq.), prior to approval. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to the project area and the surrounding environment, should be included in the draft EIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the project area and the surrounding environment, are not available for inclusion in the Draft EIR, then an Addendum or Supplement to the draft EIR may be required.

DTSC is also administering the Revolving Loan Fund (RLF) Program which provides revolving loans to investigate and clean up hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSC's Schools process or RLF Program, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (714) 484-5320 or at rana.georges@dtsc.ca.gov.

Sincerely,



Rana Georges
Project Manager
Schools Evaluation and Brownfields Cleanup Branch
Brownfields and Environmental Restoration Program

cc: State Clearinghouse (via e-mail)
Office of Planning and Research
state.clearinghouse@opr.ca.gov

Mr. Michael O'Neill (via e-mail)
Department of Education
moneill@cde.ca.gov

Bedelia Honeycutt (via e-mail)
Department of Education
bhoneycu@cde.ca.gov

Ms. Patricia Brenes

June 2, 2016

Page 3

David Kereazis (via e-mail)

DTSC CEQA Tracking Center – Sacramento, CA

dave.kereazis@dtsc.ca.gov

B&ERP Reading File – Cypress

CEQA Reading File – Cypress

THIS PAGE INTENTIONALLY LEFT BLANK